

ITEM 7 - Action
October 21, 2015

Compilation of Comments Received Regarding the
2015 Amendment to the Financially Constrained
Long-Range Transportation Plan (CLRP) and the
Air Quality Conformity Analysis

Comments Received on the Draft 2015 CLRP Amendment

Submitted by: An Individual

Baake, Paula

Alexandria, VA 22312

10/10/2015 11:07:38 PM

Subject: Support Northern Virginia I-66 Projects for Inclusion in 2015 CLRP Amendment

I am a local resident and business owner. Please take proactive action to solve the I-66 corridor asap. This is a treat to out regions continued growth.

Upgrading the I-66 corridor is long overdue.

I urge the National Capital Region Transportation Planning Board to support the Northern Virginia I-66 Corridor Improvements Outside and Inside the Beltway for inclusion in the 2015 Constrained Long Range Plan (CLRP) amendment.

Outside the Beltway, I urge the Board to adopt the proposed Alternative 2B to include three conventional and two managed lanes in each direction with a median reservation for future transit.

Inside the Beltway, additional lanes and transit are needed now. Toll revenues should be dedicated for additional lanes and transit starting in 2017, and new lane construction should begin by 2020.

I-66 is an integral link and connector for virtually every Northern Virginia jurisdiction and major activity center.

Today, I-66 congestion outside and inside the Beltway is crippling our region.

New highway and transit capacity inside and outside the Beltway are essential to future regional economic viability, global competitiveness, quality of life and homeland security.

Please support the inclusion of these two projects in the 2015 CLRP.

Barnett, Tony

, VA

10/9/2015 3:13:51 PM

Subject: Partial Support of the Northern Virginia I-66 Projects for Inclusion in 2015 CLRP Amendment

Upgrading the I-66 corridor is long overdue.

Outside the Beltway, I urge the Board to adopt the proposed Alternative 2B to include three conventional and two managed lanes in each direction with a median reservation for future transit.

Inside the Beltway, additional lanes and transit are needed now. There should NOT be any restricted lanes inside the Beltway but I support the expansion to include two managed toll lanes and two conventional lanes. It is totally unfair to restrict a critical artery and charge outrageous fees for their use!

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Today, I-66 congestion outside and inside the Beltway is crippling our region.

New highway and transit capacity inside and outside the Beltway are essential to future regional economic viability, global competitiveness, quality of life and homeland security.

I support the Outside of the beltway project.

I do not support the proposed conversion of I-66 inside of the beltway and find the proposed toll rates to be criminal!

Barry, Paul

Alexandria, VA 22304

10/7/2015 3:15:01 PM

Subject: Support Northern Virginia I-66 Projects for Inclusion in 2015 CLRP Amendment

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Outside the Beltway, I urge the Board to adopt the proposed Alternative 2B to include three conventional and two managed lanes in each direction with a median reservation for future transit.

Inside the Beltway, additional lanes and transit are needed now. Toll revenues should be dedicated for additional lanes and transit starting in 2017, and new lane construction should begin by 2020.

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New highway and transit capacity inside and outside the Beltway are essential to future regional economic viability, global competitiveness, quality of life and homeland security.

Please support the inclusion of these two projects in the 2015 CLRP.

Boice, Randy

Manassas, VA 20112

10/9/2015

Subject: Support Northern Virginia I-66 Projects for Inclusion in 2015 CLRP Amendment

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I urge the National Capital Region Transportation Planning Board to support the Northern Virginia I-66 Corridor Improvements Outside and Inside the Beltway for inclusion in the 2015 Constrained Long Range Plan (CLRP) amendment.

Outside the Beltway, I urge the Board to adopt the proposed Alternative 2B to include three conventional and two managed lanes in each direction with a median reservation for future transit.

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Please support the inclusion of these two projects in the 2015 CLRP.

Subject: Support Northern Virginia I-66 Projects for Inclusion in 2015 CLRP Amendment

I-66 is an integral link and connector for virtually every Northern Virginia jurisdiction and major activity center and upgrading the I-66 corridor is long overdue. Today, I-66 congestion outside and inside the Beltway is crippling our region.

Inside the Beltway, additional lanes and transit are needed now. Toll revenues should be dedicated for additional lanes and transit starting in 2017, and new lane construction should begin by 2020.

Outside the Beltway, I urge the Board to adopt the proposed Alternative 2B to include three conventional and two managed lanes in each direction with a median reservation for future transit.

I strongly urge the National Capital Region Transportation Planning Board to support the Northern Virginia I-66 Corridor Improvements Outside and Inside the Beltway for inclusion in the 2015 Constrained Long Range Plan (CLRP) amendment.

New highway and transit capacity inside and outside the Beltway are essential to future regional economic viability, global competitiveness, quality of life and homeland security.

Please support the inclusion of these two projects in the 2015 CLRP.

Christman, Bruce

Herndon, VA

10/9/2015

Subject: Support Northern Virginia I-66 Projects for Inclusion in 2015 CLRP Amendment

I support stronger enforcement of the current HOV restrictions during rush hour. I support toll lanes in 2020, but a toll should be paid only for those who are driving solo during rush hour. HOV 2 should be permitted, and those with motorcycles and grandfathered hybrid vehicles should not have to pay a toll. If that does not work, then you could go to HOV 3.

Chua, Bee

Dunn Loring, VA 22027

10/10/2015 9:37:46 PM

Subject: I-66 expansion outside the beltway

I am a retired resident in Dunn Loring. My house will be taken completely by the I-66 outside the beltway project. I live here because I need the walkable access to Dunn Loring Metro station, the shops and bus services outside the Metro.

The bike path for bikers to merge from I-66 to Gallows road using Stenhouse place is unsafe. It creates hazardous condition when the neighbors back up their cars to the same Stenhouse place.

VDOT should minimize the impact to Stenhouse Place. Gallows road expansion is unnecessary and it brings inconvenient to the entire Dunn Loring and Vienna communities. It only makes the area less walking friendly when pedestrians have to cross 6-lane wide Gallows road.

I-66 Project scope should be limited to Gallows Road bridge expansion. The project footprint should be limited to the expansion of the bridge alone and added lanes should taper as quickly and safely as possible to minimize the impact to the neighborhoods on the northeast side of the bridge. The project design team is also asked to carefully evaluate the necessary width of the lanes on Gallows Road to mitigate the extent of right-of-way needed to expand to 6 lanes, opting ideally for 10-foot-wide vehicular lanes to promote greater safety for pedestrians and cyclists per guidance from TRB and TTI. (Direct links to references: <http://trid.trb.org/view.aspx?id=312924> ; <http://trjournalonline.trb.org/doi/abs/10.3141/2023-08> ; <http://d2dtl5nnlpr0r.cloudfront.net/tti.tamu.edu/documents/1769-S.pdf>)

Homeowners remaining on Stenhouse Place should be consulted (in conjunction with the Stenwood HOA) as to the planned use of land and afforded appropriate physical and natural barriers between the Stenwood HOA neighborhood and Gallows Road.

If VDOT is planning to expand Gallows Bridge and Gallows road to to 6 lanes, we are asking to extend the sound wall from I-66 to Gallows Road and Stenhouse Place intersection. This will reduce 1.) Noise pollution, 2.) Air pollution, and 3.) Headlights from vehicles, to the impacted Stenwood HOA and Stenhouse Place homeowners. This will also keep children in the HOAs safe from the widened Gallows Road in the near future.

Subject: I-66 Outside the Beltway Project - Environmental impacts

I live with my family in Dunn Loring and I am currently a student at Stenwood Elementary School. I love living in this area and I love my school. I do not wish Gallows Road to be expanded because I walk to school and it will be very hard and dangerous for me to walk across a 6-lane wide crosswalk at Gallows Road/Cottage Street intersection. There will be more cars and it will also be more dangerous to walk and bike to school along a wider Gallows Road. It will also be very noisy and it will be very hard for me and my friends to focus and learn at school. Please do not remove the existing trees and soundwall because my school is right by I-66 and without the trees and soundwall, it will be very noisy at school and very hard for me and my friends to focus and learn at school. We also do not want to breathe in the polluted air because we play outside during recess and school activities. I do not want my home to be taken and do not wish to move to another place because I love going to my school and I love seeing my teachers and friends. My home can be saved. Please save my home. Thank you.

Desjardins, Doleres

Dunn Loring, VA 22027

10/10/2015 11:07:38 PM

Subject: Oppose I-66 Outside the beltway project.

I am a resident in Dunn Loring. I oppose the Northern Virginia I-66 Corridor Improvements Outside the Beltway for inclusion in the 2015 Constrained Long Range Plan (CLRP) amendment.

I believe that the public deserves a wider range of alternatives for fixing I-66 Outside the Beltway. Adding more highway lanes is not an effective long-term solution to the transportation needs of residents and commuters in the I-66 Corridor. All of the current proposed alternatives would cause enormous disruptions to many communities and have significant impacts on neighborhoods, our air, and streams. VDOT's environmental analysis does not adequately study these impacts or possible alternatives that would avoid these impacts entirely.

Any long-term solution on I-66 must include a focus on building more walkable and bikeable communities near transit. More and more businesses want to locate near transit, and more and more people want to live near transit. Although advertised as toll-funded, VDOT's estimates show that this project will cost one to two billion dollars over projected toll revenues.

A major transportation project of this magnitude should offer real transportation options for the future, putting transit first and providing needed connections for biking and walking. I-66 could add new bus transit service without needing to add any new pavement. VDOT should also focus on fixing bottlenecks such as the Route 28 interchange before committing to such an expensive and disruptive course of widening the entire 25-mile stretch of the highway.

Dobson, Eric

Arlington, VA 22207

10/9/2015 9:09:32 AM

Subject: Inside the Beltway

I would like to offer a new challenge for consideration about congestion "inside the beltway".

Why is so much focus being constantly put on I-66? What about US 50 inside the beltway? That is a catastrophe.

Back in the 1970's, Arlington County rebuilt George Mason Drive and Carlin Springs Drive to be grade separated intersections as part of their commitment to transportation. I believe the understand was the Fairfax County would also improve US 50. That has NEVER happened.

US 50 inside the Beltway could be made into a limited access roadway. The r.o.w. exists. Do it.

A good example of this is Branch Ave, Route 5 in Maryland. The Road was much like US50 with stop lights. It has become a high speed grade seperated roadway thru the congested areas outside the beltway.

Part of the problem with I-66 is that US50 isn't operating efficiently. Fix US50 so that people can use that too.

US 50 should be three lanes (like Arlington) and limited access inside the Beltway.

We need to stop forcing everything onto I-66 and then complaining it doesn't work.

Subject: Support Northern Virginia I-66 Projects for Inclusion in 2015 CLRP Amendment

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Outside the Beltway, I urge the Board to adopt the proposed Alternative 2B to include three conventional and two managed lanes in each direction with a median reservation for future transit.

Inside the Beltway, additional lanes and transit are needed now. Toll revenues should be dedicated for additional lanes and transit starting in 2017, and new lane construction should begin by 2020.

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Please support the inclusion of these two projects in the 2015 CLRP.

Farrell, Chris

Wheaton, MD 20902-3010

9/11/2015 5:01:17 PM

Subject: Incentivizing transit over auto

COGs should encourage transit use by incentivizing employers (especially the largest) to provide weekly (or longer) transit passes to employees rather than paying the per ride cost for commuting to the place of employment. The goal is to reduce weekend auto use and even the need for as many autos per household.

Feldman, Camden

10/9/2015 3:13:51 PM

Subject: Support Northern Virginia I-66 Projects for Inclusion in 2015 CLRP Amendment

My name is Camden and I travel on I-66 5 days a week from NorthWest DC to Herndon, VA.

The congestion and amount of traffic that I experience on a daily basis is far in excess. I understand that traffic is something that we have to live with, to a certain extent, but if it is preventable, action should be taken. There are specific target areas of traffic along the corridor, which should make the planning and execution of a viable plan easier to attain.

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Please support the inclusion of these two projects in the 2015 CLRP.

Gupta, Animesh

Falls Church, VA 22043

10/9/2015 3:13:51 PM

Subject: Support Northern Virginia I-66 Projects for Inclusion in 2015 CLRP Amendment

No TOLLS

Upgrading the I-66 corridor is long overdue.

I urge the National Capital Region Transportation Planning Board to support the Northern Virginia I-66 Corridor Improvements Outside and Inside the Beltway for inclusion in the 2015 Constrained Long Range Plan (CLRP) amendment.

However, I don't want TOLLS either inside or outside the beltway, this will lead to traffic congestion on our local McLean roads.

Please support the inclusion of these two projects in the 2015 CLRP.

Gupta, Arvind

McLean, VA 22102

10/9/2015 3:13:51 PM

Subject: Support Northern Virginia I-66 Projects for Inclusion in 2015 CLRP Amendment

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Please support the inclusion of these two projects in the 2015 CLRP.

Hall, Therisia

Falls Church, VA 22042

10/9/2015 3:13:51 PM

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Please support the inclusion of these two projects in the 2015 CLRP.

Harrover, Andrew

10/9/2015

Subject: I-66

Please, no more HOT lanes. They don't help those of us that can't afford them. Go, drive on 95 south this afternoon. Drive in the "commoners lanes" and let me know how much better the HOT lanes south have made things.

Subject: Alternate (non-vehicle) Transit must be made a priority in the plans for I-66

The project has failed to provide a reasonable plan to match the rhetoric of supplying "rapid transit" on I-66. The Secretary of Transportation stated that Virginia does not wish to allow the same to happen on I-66 that has happened with the lack of robust transit on I-495. Two things must happen, the project must reduce the currently planned headways from 20-25 minutes to 8-10 minutes (for a reasonable span during peak hours) and commit funding to advertising the future bus service, which should be ready on the first day of revenue service for the HOT lanes. Only by providing genuine rapid transit service will the project live up to the notion of being a truly multimodal project.

The project must plan for long-term investment in transit options that reduce the number of cars on the road or we will be paving over Fairfax County neighborhoods for decades to come. The demand and commuter support for extension of the Metro Orange line is clear. VDOT has also recommended a design that reserves the land for future Metro expansion. We have been told by regional project planners that extension of the Orange line is not presently an option given the ongoing challenges faced by WMATA in supporting the current metro system. However, we must be ready financially for when the opportunity arises and ensure that this extension and an increase in train capacity remain at the top of the priority list. To ensure the region is financially able to support this project, a portion of the toll revenue on I66 should be reserved specifically for the Orange line metro expansion and that any obstacle to this future transit option be removed.

Heier, Deanna

Dunn Loring, VA 22027

10/10/2015 9:24:37 PM

Subject: I-66 Outside Beltway project Impact to Community Health (Noise, Air, Water/Soil, Visual Pollution)

The I-66 Outside the Beltway project will have a significant impact on the communities surrounding the I66-I495 interchange and beyond. The Transportation Planning Board must carefully consider the irreversible environmental and quality of life impacts this project will have on our region.

The attached outlines the following impacts:

- Plan includes extensive loss of tree lines throughout the corridor.
- Soundwall quality and height has yet to be fully documented.
- Active noise and air quality monitoring must be implemented in this part of the region.
- Uncertainty remains surrounding stormwater management plan.

Heier, Deanna

Dunn Loring, VA 22027

10/10/2015 9:09:00 PM

Subject: Unnecessary Costs & Impact in I-66 Outside Beltway Project

The I-66 Outside the Beltway project will have a significant impact on the communities surrounding the I66-I495 interchange. The current proposal submitted for inclusion in the CLRP requires further evaluation of viable alternatives that reduce cost & impact while still relieving traffic congestion throughout the corridor.

We ask that the project planners and decision makers carefully consider the 'Do No Harm' proposal and the significant benefits it offers before incurring the costly and irreversible damage to the community being proposed at the I-495/I-66 interchange. For this particular part of the project, the degree of uncertainty and risk remains too high to make quick decisions to try to solve such an important problem. It would be prudent and more cost-effective to implement the rest of the 'Outside the Beltway' project's proposed plans (west of the interchange), assess its impact on traffic congestion relief, and then revisit the needs for the interchange once an overall plan and vision for I-66 inside and outside the beltway are finalized.

**This submissions corrects an important typo in the initial submission. Thank you.

Subject: Alternative Transit Options Needed for I-66 project

I believe that the public deserves a wider range of alternatives for fixing I-66 Outside the Beltway. Adding more highway lanes is not an effective long-term solution to the transportation needs of residents and commuters in the I-66 Corridor. All of the current proposed alternatives would cause enormous disruptions to many communities and have significant impacts on neighborhoods, our air, and streams. VDOT's environmental analysis does not adequately study these impacts or possible alternatives that would avoid these impacts entirely.

Any long-term solution on I-66 must include a focus on building more walkable and bikeable communities near transit. More and more businesses want to locate near transit, and more and more people want to live near transit. Although advertised as toll-funded, VDOT's estimates show that this project will cost one to two billion dollars over projected toll revenues.

A major transportation project of this magnitude should offer real transportation options for the future, putting transit first and providing needed connections for biking and walking. I-66 could add new bus transit service without needing to add any new pavement. VDOT should also focus on fixing bottlenecks such as the Route 28 interchange before committing to such an expensive and disruptive course of widening the entire 25-mile stretch of the highway.

Hii, Kwong

Dunn Loring, VA 22027

10/10/2015 9:01:13 PM

Subject: I-66 Outside the beltway expansion

I am a resident at Stenhouse Place, Dunn Loring. My house is in the I-66 outside the beltway preferred alternative to be taken completely. Dunn Loring communities (just outside the beltway) is the most impacted area in the entire I-66 project. However, enormous damage will be done to this area while no benefit is granted to all of the very transit oriented residents.

I-66 Project scope should be limited to Gallows Road bridge expansion. The project footprint should be limited to the expansion of the bridge alone and added lanes should taper as quickly and safely as possible to minimize the impact to the neighborhoods on the northeast side of the bridge. The project design team is also asked to carefully evaluate the necessary width of the lanes on Gallows Road to mitigate the extent of right-of-way needed to expand to 6 lanes, opting ideally for 10-foot-wide vehicular lanes to promote greater safety for pedestrians and cyclists per guidance from TRB and TTI. (Direct links to references: <http://trid.trb.org/view.aspx?id=312924> ; <http://trjournalonline.trb.org/doi/abs/10.3141/2023-08> ; <http://d2dtl5nnpfr0r.cloudfront.net/tti.tamu.edu/documents/1769-S.pdf>)

Homeowners remaining on Stenhouse Place should be consulted (in conjunction with the Stenwood HOA) as to the planned use of land and afforded appropriate physical and natural barriers between the Stenwood HOA neighborhood and Gallows Road.

If VDOT is planning to expand Gallows Bridge and Gallows road to to 6 lanes, we are asking to extend the sound wall from I-66 to Gallows Road and Stenhouse Place intersection. This will reduce 1.) Noise pollution, 2.) Air pollution, and 3.) Headlights from vehicles, to the impacted Stenwood HOA and Stenhouse Place homeowners. This will also keep children in the HOAs safe from the widened Gallows Road in the near future.

VDOT/Transform66 has failed to provide sufficient reason and cost/benefit analysis for why the "Do No Harm" alternative (proposed by Transform66Wisely.org) is not feasible. This proposal was able to eliminate ALL complete home takings and further reduce partial home takings. Besides, it will greatly reduce the footprint of the enormous I-66/ I-495 interchange and overall cost.

Subject: Misguided I-66 Projects in 2015 CLRP Amendment

The project is misguided as a matter of policy. It mistakes doing something big with implementing successful policies. VDOT will attempt to convince the TPB that it has made a serious attempt at delivering a serious plan. Do not be tempted to believe it. This proposal pretends to be a multimodal solution, yet it fails to seriously layout anything simulating a serious plan to ensure that these so-called improvements to I-66 are anything more than another VDOT highway widening project. It is a form of engineering chicanery that will bring us back to another widening within a generation's time.

There is no doubt that I-66 is congested and requires improvement. However, as has been noted repeatedly by transportation professionals at all levels of government, somehow with the exception of VDOT, we cannot build our way out of congestion. Improved transit, on the other hand can deliver results that will endure and provide citizens with the transportation choices that they currently lack.

The following topics are areas in which I believe the project fails to adequately advise the responsible policymakers, such as TPB's membership, in providing the kind of alternatives analysis or judgment that is necessary for well-informed decision-making.

HOV violations

One of the primary stated issues with capacity on I-66 is that something like one-third to half of peak hour vehicles are supposedly in violation of the HOV rules, which gives rise to the forecast congestion problem. Where is the explanation of what it would cost to properly enforce the HOV rules and what effect that would have on maintaining adequate throughput until some estimated year?

Lack of a transit-centric proposal

First, I would like to note that VDOT has not provided anything like a cost-benefit analysis for this project, certainly not one that compares a transit-centric approach to solving the Northern Virginia region's congestion issues. Comparing the no-build scenario to the current proposals is insufficient without a well fleshed out transit-centric alternative. At the very minimum, VDOT should have developed a shoulder-lane transit alternative.

The current transit plan is better than what was developed for I-495 or I-95. However, we should demand more. VDOT hasn't been the VDH for many years. It is risible that any transportation professional would call 20 to 25-minute-headways rapid transit. With those kinds of headways and the likely dearth of advertising expenditures allocated for I-66 bus routes, I'm not optimistic at all about the future of transit on I-66.

Dedicated funding to mass transit

Instead of planning for 20- to 25-minute headways on bus service that is years away and only being phased in incrementally without any specified provider of this regional service (doesn't WMATA already have enough on its plate?), this project should take the name of the proposed service seriously — rapid bus service — and put the financial resources into ensuring genuine rapid transit service. That is, headways should be no worse than eight to ten minutes during peak service hours. Anything less fails to meet the professional definition of rapid transit and will not attract ridership in sufficient numbers to provide satisfactory fare-box recovery rates.

Moreover, funding for transit should be financed in part with a clear allocation from toll revenues. An apportionment should be established within the project documents before the project receives permission to proceed.

Project modeling must account for induced demand

Without accounting for the additional vehicles that the expansion of capacity will yield, forecasting for this project will not be accurate. Therefore, the project will result in increased congestion rather than a reduction by attracting more vehicles. Moreover, the modeling will show—as state and federal projections have for years now—higher than actual traffic levels. This will lead to over-engineering of highways and roads, which is neither fiscally prudent nor a means to reduce congestion. Contrary to VDOT's stated goals, it will not even reduce travel times, except for on the express lanes, leaving small to no benefit for riders in the general-purpose lanes.

Indeed, the project documents only ever mention induced development, suggesting that the I-66 project outside the Beltway will not cause increased real estate development as if that were a satisfactory outcome. This finding is so backwards as to defy any sense of reason.

Incremental approach

I'd rather see VDOT first try something more incremental structurally to facilitate a pilot program with transit lanes (shoulder lanes or other innovation) on I-66 before committing billions of dollars to this widening and transformation to express lanes. The current plan doesn't seem fiscally prudent in my humble opinion, though it could easily become the least bad option after extending the life of the current system with improved transit (8-car trains on the Orange line wouldn't hurt either).

Lack of vision/innovation

It is widely acknowledged that ITS, connected vehicles, and self-driving cars are approximately ten years away from widespread implementation on our roads. This plan does not include any kind of recognition of these coming changes. The irony of which is that VDOT just rolled out its ATM system that acknowledges these types of innovations.

The lack of inclusion of near-market technologies leads to forecasting that overstates the needed physical capacity, making similar mistakes as failing to account for induced demand. Therefore, committing to a multi-billion dollar project without accounting for current technological trends, induced demand, or attacking low-hanging fruit possible through incremental approaches demonstrates myopia of the first order.

Narrower lanes for local roads over I-66 for safety and cost-savings

Crossings over I-66 — like Cedar Lane and Gallows Road — are part of a relatively dense and vibrant urban and suburban fabric. Arguments by VDOT against narrower lanes ignore research on urban and suburban arterials: Effective Utilization of Street Width on Urban Arterials (Transportation Research Board, <http://trid.trb.org/view.aspx?id=312924>), Relationship of Lane Width to Safety on Urban and Suburban Arterials (Transportation Research Board, <http://trjournalonline.trb.org/doi/abs/10.3141/2023-08>), and Design Factors That Affect Driver Speed on Suburban Arterials (Texas Transportation Institute, <http://d2dtl5nnpfr0r.cloudfront.net/tti.tamu.edu/documents/1769-S.pdf>). Past arguments from VDOT also failed to acknowledge that the Highway Capacity Manual and the Green Book both allow for and even encourage lanes narrower than 12' wide on urban arterials. It is important to note that these roads have speed limits of 35 MPH and less. Also, the crossings themselves are discrete, linear paths not requiring turning radii or other accommodations needed for larger vehicles. Buses and trucks can surely stay in their lane at 35 MPH.

Save money and improve safety for all road users of all modes with narrower lane widths on neighborhood streets.

Lack of a rigorous public accounting of cost-benefit analysis poses a problem

Project documentation should disclose publicly financial-grade cost-benefit analysis to assist the citizens determine the prudence of proceeding with this project in its current configuration. Without that type of assessment, it is impossible to make a truly informed decision. Any analysis must show a return on investment and take into account full lifecycle costs. The current price tag grossly underestimates the true cost the citizens of the Commonwealth when contrasted with transit because of the inclusion of operational costs in costing out the implementation of transit. VDOT must present the public with a transparent and full accounting of the cost.

Stormwater Issues

Last, in a somewhat different direction, I would like to point out that citizens living along I-66 in Fairfax County have long been on the receiving end of insufficient stormwater management practices. The I-66 project should not receive any grandfathering of stormwater regulations. Where the project needs to provide larger capacity stormwater facilities, VDOT should use techniques and facilities that meet the state of the practice, rather than simply exercise eminent domain to turn homes into retention ponds, especially when those homes are in the kind of transit-oriented/adjacent communities that responsibly make use of scarce land near the Beltway.

First and foremost, VDOT should be required to construct any project with as much porous pavement as possible. It is true that with high moisture content in soils — like the silts and clays of Northern Virginia — comes low strength. However, this does not mean that VDOT cannot mitigate the problem from silts and clays. Soils such as clays and silt/clay react very well to chemical stabilization, particularly with lime and Type C fly ash. Treating those types of soils with lime and fly ash changes the grain size, makes them larger, and cements those larger particles together, which imparts strength to the soil mass. Additionally, I believe the use of geotextile can also lessen the issue of moisture affecting adjacent soil. In short, it appears that VDOT has at least two sets of options for implementing shoulder lane retention without any adverse impact on structural integrity or adjacent lanes.

As for the clogging issue that VDOT has raised in the past, it is a fair concern. The other U.S. state DOTs and European countries that use pervious pavements on mainline lanes use vacuum cleaners to remove the debris that gets into the surface pores. Indeed, Fairfax County has vector trucks service its facilities' porous facilities. Maintaining

the porous surface is neither beyond the capabilities of VDOT nor any other entity. Of course it is worth pointing out that VDOT's concern about "run-off from adjacent slopes" would be mooted if VDOT were to use its entire ROW (via bio-swales, rain gardens, etc.) for stormwater treatment instead of pushing off the run-off from within its ROW onto private property. That said, it may be more productive to focus on the inside shoulder lanes that would fall within the responsibility of the concessionaire.

In general and as a technical matter, in addition to the preceding stormwater discussion, research from the Transportation Research Board appears to disagree with VDOT's assessment. First, in its detailed study (NCHRP 25-25 Task 82) of shoulder lane retention facilities, the National Cooperative Highway Research Program (NCHRP) clearly indicates that permeable shoulder lanes are a constructible and maintainable solution. In an even more comprehensive study (NCHRP 802), NCHRP includes shoulder lane retention and other methods that VDOT has failed to proffer as mitigation to affected properties. Moreover, the menu of stormwater volume reduction approaches (VRAs) goes beyond shoulder lane retention. The menu includes bio-swales, rain gardens, and other VRAs that can contain runoff within the VDOT ROW (i.e., within the ROW but outside the cart way).

Accordingly, I request VDOT to reconsider the use of additional VRAs that could completely eliminate the need for this inordinate exercise of eminent domain.

In conclusion, there is no doubt that Northern Virginia needs to improve the movement of people, especially during peak travel periods. However, it is fiscally unsustainable to continue to build out or roadways for peak conditions without first availing ourselves to expanded alternatives to automobiles.

Hook, Marcia

Dunn Loring, VA 22027

10/10/2015 10:20:56 PM

Subject: I-66 Outside the Beltway

I am writing to express my opposition to the inclusion of the I-66 Outside the Beltway project in the CLRP. I do not believe that VDOT has sufficiently demonstrated that the project is likely to receive financial funding; indeed, Virginia has not even decided whether the project would be a public-private partnership or publicly funded. If the project were to be publicly funded, it is possible that the state would be unable to fund project, or that the project would be constructed at a much later date.

Moreover, the TPB should push VDOT to take a consistent approach inside and outside the Beltway. As currently proposed, it is possible that VDOT would seek to expand I-66 inside the Beltway immediately after completing expansion of I-66 outside the beltway. If this were to occur, it is likely that VDOT would need to substantially rebuild the I-495 interchange for a third time in a 15 year period. Rather than approaching I-66 in a piecemeal and illogical fashion, VDOT should take the same approach outside the Beltway as it is inside the Beltway. Specifically, VDOT should first exhaust all options that do not involve expansion of I-66 outside the Beltway, including implementation of congestion pricing, extending the metro, implementing rapid bus service, and other public transit options. Promoting this type of consistent regional planning is exactly why the TPB was created.

Finally, if the TPB does include the I-66 Outside the Beltway project in the CLRP, it should condition the approval on appropriate mitigation to protect local communities. In particular, VDOT should be required to relocate displaced residents no further from a metro than they are currently located and, if possible, within the same community. VDOT should be required to notify residents who remain of the construction schedule, and should be subject to nighttime construction noise restrictions.

Subject: Support Northern Virginia I-66 Projects for Inclusion in 2015 CLRP Amendment

Upgrading the I-66 corridor is long overdue.

I urge the National Capital Region Transportation Planning Board to support the Northern Virginia I-66 Corridor Improvements Outside and Inside the Beltway for inclusion in the 2015 Constrained Long Range Plan (CLRP) amendment.

Outside the Beltway, I urge the Board to adopt the proposed Alternative 2B to include three conventional and two managed lanes in each direction with a median reservation for future transit.

Inside the Beltway, additional lanes and transit are needed now. Toll revenues should be dedicated for additional lanes and transit starting in 2017, and new lane construction should begin by 2020.

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New highway and transit capacity inside and outside the Beltway are essential to future regional economic viability, global competitiveness, quality of life and homeland security.

Please support the inclusion of these two projects in the 2015 CLRP.

Josue, Doris

Dunn Loring, VA 22027

10/10/2015 11:03:17 PM

Subject: Oppose I-66 Outside the beltway project.

I am a resident in Dunn Loring. I oppose the Northern Virginia I-66 Corridor Improvements Outside the Beltway for inclusion in the 2015 Constrained Long Range Plan (CLRP) amendment.

Khurana, Sonia

Dunn Loring, VA 22027

10/10/2015 4:22:05 PM

Subject: 66 Expansion

To Whom It May Concern,

Has anyone even taken a look at the uploaded comments that were submitted. They are all copied and pasted from each other. The entire project research is skewed towards expanding 66. For example, VDOT did a survey on Gallows Rd near Stenwood Elementary 2 months ago. This survey was done when schools were closed for summer vacation. The community has been very vocal and providing options but when we see the designs, those are not being considered.

I agree that there is an issue with congestion but again, have we exhausted all the possibilities before we spend 3 billion dollars on this project? Expanding Gallows to 2 extra lanes toward Stenwood HOA properties would be a concern for environmental air quality, noise, pollution and safety for the children that reside in the area. Building a sound barrier would help reduce noise pollution but the Stenwood HOA does not want to expose our community to bikers due to safety concerns.

If this project is going to happen, please make sure that you have enough planning to obstruct the noise, safety, and pollution. I would like to see a proposed plan on that along with the options shown.

Kim, Julie

Bristow, VA 20136

10/9/2015 3:13:51 PM

Subject: Support Northern Virginia I-66 Projects for Inclusion in 2015 CLRP Amendment

Upgrading the I-66 corridor is long overdue.

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Please support the inclusion of these two projects in the 2015 CLRP.

Krishnan, Jay

Dunn Loring, VA 22027

10/10/2015 6:19:52 PM

Subject: I66 Expansion

There are lots of comments that are copied and pasted - just shows how rigged this system is. Any expansion work should be done that will address the core problem and not create more issues. Expansion of Gallows road does not make sense especially since it is not all the way down to Tysons. The added pollution and safety issues this creates is not getting addressed. VDOT has not done enough due diligence in researching other common sense options. Please consider all viable alternatives before wasting billions of dollars that will not solve the problem.

Kvasnyuk, Sergey

Arlington, VA 22207

10/9/2015 3:13:51 PM

Subject: Support Northern Virginia I-66 Projects for Inclusion in 2015 CLRP Amendment

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Please support the inclusion of these two projects in the 2015 CLRP.

Subject: 66 expansion

I am strongly opposed to the proposal to expand Rt. 66 outside the Beltway. This will be enormously expensive. Just the Dunn Loring Metro station alone represents a huge project that will have to be ripped up to accommodate an expansion. All of the new traffic management over head signs and posts will have to be redone. It is sickening to think of the waste! Furthermore, these new lanes will create new pollution. Houses are being torn down and neighborhoods in the Dunn Loring area will be ruined. The residents who remain will have more noise and air pollution. To top it off, those residents won't even be able to access the HOT lanes into DC without backtracking significantly. They bear all of the costs and none of the benefits. This is WRONG and un-American. Do NOT fund this wasteful project.

Lee, Siew

Dunn Loring, VA 22027

10/10/2015 8:05:25 PM

Subject: I66 Outside of Belway

I oppose the I-66 Outside the Beltway project given the adverse environmental and financial impacts to the Dunn Loring community. I am a resident of the Dunn Loring community, and my home is proposed to be completely taken as part of VDOT's I66 outside the Beltway project. Dunn Loring is a transit-oriented community and is developing into a walkable community, but it is being negatively impacted by the project that calls for Gallows Bridge/Road expansion, more highway lanes, more traffic congestion, and insufficient mass transit improvements (such as Metro expansion). The project is not bringing multimodal transit options as its name claims.

The portion of Gallows Road between the Gallows Bridge and Cottage Street is located right outside of Stenwood Elementary School, and it is heavily used by pedestrians like children and families walking to/from the school. The addition of lanes will add more traffic and safety concerns to families and children walking or commuting to/from the school. The Gallows Bridge/Road expansion should be limited to the Gallows Bridge alone and the lanes should follow the 10-foot-wide lane width guidance from TRB and TTI to ensure pedestrian safety and to further reduce the number of full home takings to zero (Direct links to references:

<http://trid.trb.org/view.aspx?id=312924>;

[http://trjournalonline.trb.org/doi/abs/10.3141/2023-](http://trjournalonline.trb.org/doi/abs/10.3141/2023-08)

[08;http://d2dtl5nnlpfr0r.cloudfront.net/tti.tamu.edu/documents/1769](http://d2dtl5nnlpfr0r.cloudfront.net/tti.tamu.edu/documents/1769)

[-S.pdf](#) ; <https://www.transportation.gov/fastlane/design-flexibility-stronger-communities>).

If the Gallows Bridge/Road must be expanded, then natural and physical barriers and sound walls should be added to both sides of Gallows Road up to the Stenhouse Place intersection to minimize the air, noise and visual pollution from the construction and added traffic, as well as to reduce the unnecessary and disturbing headlights from the vehicles.

While I support bike lane improvement as another transit option, it should not be added at the cost of complete home takings on Stenhouse Place, which will negatively and significantly impact the quality of life of affected families and children. A bike trail on a residential street will also create safety concerns to the children in the neighborhoods.

The above adverse environmental and safety impacts to the Stenwood School community and nearby neighborhoods must be taken into serious consideration. Every effort should be made to reduce the full and partial home takings to zero.

Subject: Support Northern Virginia I-66 Projects for Inclusion in 2015 CLRP Amendment

Upgrading the I-66 corridor is long overdue.

I urge the National Capital Region Transportation Planning Board to support the Northern Virginia I-66 Corridor Improvements Outside and Inside the Beltway for inclusion in the 2015 Constrained Long Range Plan (CLRP) amendment.

Outside the Beltway, I urge the Board to adopt the proposed Alternative 2B to include three conventional and two managed lanes in each direction with a median reservation for future transit.

Inside the Beltway, additional lanes and transit are needed now. Toll revenues should be dedicated for additional lanes and transit starting in 2017, and new lane construction should begin by 2020.

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Please support the inclusion of these two projects in the 2015 CLRP.

Loftus, Marueen

Vienna, VA 22180

10/9/2015 3:13:51 PM

Subject: Support Northern Virginia I-66 Projects for Inclusion in 2015 CLRP Amendment

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Please support the inclusion of these two projects in the 2015 CLRP.

Longenbach, Kevin

Alexandria, VA 22314

10/9/2015 3:13:51 PM

Subject: Support Northern Virginia I-66 Projects for Inclusion in 2015 CLRP Amendment

I join many others to urge the National Capital Region Transportation Planning Board to support the Northern Virginia I-66 Corridor Improvements Outside and Inside the Beltway for inclusion in the 2015 Constrained Long Range Plan (CLRP) amendment.

Outside the Beltway, I urge the Board to adopt the proposed Alternative 2B to include three conventional and two managed lanes in each direction with a median reservation for future transit.

Inside the Beltway, additional lanes and transit are needed now. Arlington's parochial opposition to the obvious need to provide additional lanes should not be allowed to hold the entire region hostage to their demands. The Toll revenues should be dedicated for additional lanes and transit starting in 2017, and new lane construction should begin by 2020.

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Please support the inclusion of these two projects in the 2015 CLRP.

Mcnay, Gary

Dunn Loring, VA 22027

10/10/2015 10:39:40 PM

Subject: Opposing I66 Outside the Beltway project

I am a resident in Dunn Loring. I oppose the Northern Virginia I-66 Corridor Improvements Outside the Beltway for inclusion in the 2015 Constrained Long Range Plan (CLRP) amendment.

Any expansion should be built within the existing right of way. Since Secretary of Transportation agrees to continue to reduce the number of full/partial home takings to zero, VDOT should carefully evaluate every single full taking to determine if full taking is absolutely necessary. Just compensation, natural and physical barriers must be included in the plan for impacted area. For example, Stenwood Elementary school sound walls should be rebuilt and the natural barrier (trees between the school and I-66) should be re-planted. Sound walls should be built on the Northeast side of the Gallows Road Bridge. Trees should be replanted to ensure safety of the children in the neighborhood and to reduce the impact to all residents.

Environment, air and water impact should be considered thoroughly. VDOT has not planned for any storm water management for the I-66 Outside the Beltway project. Lack of such analysis and planning will leave a huge financial burden for Fairfax County to deal with upon the project completion.

VDOT has not given full analysis and explanation of why the "Do No Harm" alternative is not viable the I-66 Corridor Improvements Outside the Beltway. The proposal has much lower impact to residents, communities, environment, and it brings a huge cost reduction. Please refer to www.transform66wisely.org for more info about "Do No Harm" alternative.

Subject: Oppose I-66 Outside the beltway project.

I am a resident in Dunn Loring. I oppose the Northern Virginia I-66 Corridor Improvements Outside the Beltway for inclusion in the 2015 Constrained Long Range Plan (CLRP) amendment.

I believe that the public deserves a wider range of alternatives for fixing I-66 Outside the Beltway. Adding more highway lanes is not an effective long-term solution to the transportation needs of residents and commuters in the I-66 Corridor. All of the current proposed alternatives would cause enormous disruptions to many communities and have significant impacts on neighborhoods, our air, and streams. VDOT's environmental analysis does not adequately study these impacts or possible alternatives that would avoid these impacts entirely.

Any long-term solution on I-66 must include a focus on building more walkable and bikeable communities near transit. More and more businesses want to locate near transit, and more and more people want to live near transit. Although advertised as toll-funded, VDOT's estimates show that this project will cost one to two billion dollars over projected toll revenues.

A major transportation project of this magnitude should offer real transportation options for the future, putting transit first and providing needed connections for biking and walking. I-66 could add new bus transit service without needing to add any new pavement. VDOT should also focus on fixing bottlenecks such as the Route 28 interchange before committing to such an expensive and disruptive course of widening the entire 25-mile stretch of the highway.

McNay, Roger

Dunn Loring, VA 22027

10/10/2015 10:57:56 PM

Subject: Opposing I-66 Outside the beltway project.

I am a resident in Dunn Loring. I oppose the Northern Virginia I-66 Corridor Improvements Outside the Beltway for inclusion in the 2015 Constrained Long Range Plan (CLRP) amendment.

I believe that the public deserves a wider range of alternatives for fixing I-66 Outside the Beltway. Adding more highway lanes is not an effective long-term solution to the transportation needs of residents and commuters in the I-66 Corridor. All of the current proposed alternatives would cause enormous disruptions to many communities and have significant impacts on neighborhoods, our air, and streams. VDOT's environmental analysis does not adequately study these impacts or possible alternatives that would avoid these impacts entirely.

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Subject: Support Northern Virginia I-66 Projects for Inclusion in 2015 CLRP Amendment

Upgrading the I-66 corridor is long overdue.

I urge the National Capital Region Transportation Planning Board to support the Northern Virginia I-66 Corridor Improvements Outside and Inside the Beltway for inclusion in the 2015 Constrained Long Range Plan (CLRP) amendment.

Outside the Beltway, I urge the Board to adopt the proposed Alternative 2B to include three conventional and two managed lanes in each direction with a median reservation for future transit.

Inside the Beltway, additional lanes and transit are needed now. Toll revenues should be dedicated for additional lanes and transit starting in 2017, and new lane construction should begin by 2020.

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Please support the inclusion of these two projects in the 2015 CLRP.

Melton, Mark

, VA

10/9/2015

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Please support the inclusion of these two projects in the 2015 CLRP.

Mersch, L

Springfield, VA 22152

10/9/2015 10:22:14 PM

Subject: Support Northern Virginia I-66 Projects for Inclusion in 2015 CLRP Amendment

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Please support the inclusion of these two projects in the 2015 CLRP.

The other need is an alternate/ additional bridge/route for crossing the Potomac River, beyond the Beltway/American Legion bridge. That bridge is aging, and is the only crossing of the river outside of the Chain Bridge, until you get to Leesburg / Rt 15. If for no other reason than security, plus the basic movement of commuters.

Miller, Laura

Vienna, VA 22182

10/8/2015 12:39:47 PM

Subject: VDOT 166 Expansion and Regional Traffic Planning

Please see attached PDF doc, "Change DC Area Traffic Wisely..."

Morse, Darlene

Vienna, VA 22180

10/10/2015 5:09:35 PM

Subject: I-66

Please no more tolls. If a lane is given to tolls then the people who can't afford the tolls will be sitting in 2 lanes. The orange line is full in one stop in Vienna before reaching DL. Please do not destroy our neighborhoods and schools for more toll roads. We should not have to sacrifice our great neighborhoods and schools for people who choose to live way out 66 and work in town. Enforce the carpool lanes.

Subject: Support Northern Virginia I-66 Projects for Inclusion in 2015 CLRP Amendment

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Please support the inclusion of these two projects in the 2015 CLRP.

Ocampo, Maria

Washington, DC 20001

10/10/2015 10:33:36 PM

Subject: No on I66 Expansion

As a former Dunn Loring resident and current Washington, D.C. resident, I am appalled and shocked to learn about the I66 expansion plan. Besides not really helping traffic or residents, the fact that the project would require the taking of homes in Dunn Loring, particularly minorities, immigrants and the elderly is quite predatory and unfair. It's an example of money or politics being more important than people and the residents of Virginia. The media has been covering this some, but they need to cover these truths more. There is time to stop this from going forward, and I hope our leaders are on the side of the people.

Park, Peddy

Vienna, VA 22181

10/10/2015 10:53:20 PM

Subject: Oppose I-66 Outside the beltway project.

I am a resident in Dunn Loring. I oppose the Northern Virginia I-66 Corridor Improvements Outside the Beltway for inclusion in the 2015 Constrained Long Range Plan (CLRP) amendment.

I believe that the public deserves a wider range of alternatives for fixing I-66 Outside the Beltway. Adding more highway lanes is not an effective long-term solution to the transportation needs of residents and commuters in the I-66 Corridor. All of the current proposed alternatives would cause enormous disruptions to many communities and have significant impacts on neighborhoods, our air, and streams. VDOT's environmental analysis does not adequately study these impacts or possible alternatives that would avoid these impacts entirely.

Any long-term solution on I-66 must include a focus on building more walkable and bikeable communities near transit. More and more businesses want to locate near transit, and more and more people want to live near transit. Although advertised as toll-funded, VDOT's estimates show that this project will cost one to two billion dollars over projected toll revenues.

A major transportation project of this magnitude should offer real transportation options for the future, putting transit first and providing needed connections for biking and walking. I-66 could add new bus transit service without needing to add any new pavement. VDOT should also focus on fixing bottlenecks such as the Route 28 interchange before committing to such an expensive and disruptive course of widening the entire 25-mile stretch of the highway.

Parker, Glenda

Alexandria, VA 22303

9/10/2015 6:57:30 PM

Subject: Clrp

There needs to be more projects funding bike paths, wide sidewalks, and rail transit. Not nearly enough emphasis on rail mass transit solutions.

Pierce, Matt

Marshall, VA 20115

10/9/2015 3:13:51 PM

Subject: Support Northern Virginia I-66 Projects for Inclusion in 2015 CLRP Amendment

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Please support the inclusion of these two projects in the 2015 CLRP.

Subject: Transform 66 Wisely

Community's 'Do No Harm' Alternative Proposal Has Yet to Be Evaluated The I-66 Outside the Beltway project will have a significant impact on the communities surrounding the I66-I495 interchange. The current proposal submitted for inclusion in the CLRP requires further evaluation of viable alternatives that reduce cost & impact while still relieving traffic congestion throughout the corridor.

Throughout the public comment period, there has been an outcry of support for and interest in the 'Do No Harm' proposal both from the state's citizens and from elected officials including State Delegate Mark Keam (see enclosed letter) and others at the county, state and federal levels. This alternative to the I-495/I-66 interchange would significantly reduce the financial cost and footprint of the 'Outside the Beltway' project, making it more financially feasible overall, and ensuring that taxpayers' dollars are being spent wisely on the most crucial transportation needs of our region. VDOT's Tier 2 report published that the cost savings of this type of 'Open Section/No Build' alternative for this segment of the project would be on the order of > \$150 million. Furthermore, the 'Do No Harm' proposal would further reduce the number home takings, it would negate the need to take land at Stenwood Elementary school, and it would possibly eliminate the need for the Gallows bridge expansion.

To date, the project team has not provided an adequate evaluation of the 'Do No Harm' proposal and has not properly weighed the pros and cons of this proposal from the community against the project team's proposed alternatives.

Given the significant benefits that the 'Do No Harm' proposal could provide the project, we request that a full evaluation of this alternative be performed and a cost:benefit comparative analysis be made publically available that includes specific figures on the financial cost, right-of-way impacts, traffic flow impact, and any safety considerations/metrics. Furthermore, it would be beneficial for decision makers (and the public) to have more details of VDOT's traffic study, including the data and references that informed this study and the project team's conclusion to dismiss the 'Do No Harm' proposal as well as the assumptions being made in the modelling projections and any other study limitations/constraints.

It is also important to highlight that the 'Do No Harm' proposal does not preclude the project from addressing specific chokepoints in this segment of the corridor, including improvements that are desperately needed at the Nutley interchange. In fact, the very concept of "doing no harm" promotes an approach of addressing currently known traffic congestion and safety issues without overengineering solutions that may actually create new problems (particularly considering the potential for incorrect assumptions used in modelling projections, changes in transportation technology, changes in the region's traffic flow needs, congestion caused by years of continual construction, and other unknowns).

This approach is consistent with the Northern Virginia Transportation Alliance's funding strategy. Members of the NVTA have commented to the media that their funding contribution to the I-66 project will focus on smaller, specific projects to relieve congestion along the I-66 corridor (highlighting 9 specific projects, most of them interchange improvements) and not one large check to widen I-66 and build toll lanes. (see article: <http://wtop.com/sprawl-crawl/2015/08/i-66-widening-could-hurt-plans-to-aid-other-congested-commuter-routes>)

As a final point, the "Do No Harm" proposal does not prevent the building of HOT lanes on I-66 in the future, if the state finds that it is warranted. Instead, it gives time for decision makers to fully assess the region's overall transportation needs and to make better, informed decisions before embarking on costly irreversible construction.

- In particular, decisions that must be made Inside the Beltway will directly impact the I-495/I-66 interchange design and traffic flow needs. The state has thus far employed a piecemeal approach to addressing traffic flow through this interchange (first I-495, now I-66 West, and still to come I-66 East) and in turn this means that we remain under major construction in this area for decades. It is unclear what parameters for the future 'Inside the Beltway' plans have been included in the 'Outside the Beltway' traffic model projections, and yet this will have a significant impact on the interchange. Without a long term decision on the Inside the Beltway plans, we may find ourselves redesigning this entire interchange again in 10 years with commuters sitting in more construction traffic and all of us watching our tax dollars wasted yet again.

Furthermore, this proposal would allow adequate time to fully evaluate the impact of other 'Outside the Beltway' project improvements. This would not only include the specific site improvements that the 'Outside the Beltway' project has proposed, but also projects that are already approved and underway. For instance, tax dollars have already been spent and implementation is ongoing for the I-66 Active Traffic Management System (ATMS) which VDOT has stated will improve safety and incident management (major causes of traffic congestion). This project launched this past month. However, if the current plans for HOT lanes are allowed to proceed, it will require the dismantling and redesign of the

locations of the ATMS equipment at an additional cost and before we are even able to see the impact of the technology. This will become yet another example to the public of misuse of taxpayer dollars and lack of leadership and vision in our transportation plans.

We ask that the project planners and decision makers carefully consider the 'Do No Harm' proposal and the significant benefits it offers before incurring the costly and irreversible damage to the community being proposed at the I-495/I-66 interchange. For this particular part of the project, the degree of uncertainty and risk remains too high to make quick decisions to try to solve such an important problem. It would be prudent and more cost-effective to implement the rest of the 'Outside the Beltway' project's proposed plans (west of the interchange), assess its impact on traffic congestion relief, and then revisit the needs for the interchange once an overall plan and vision for I-66 inside and outside the beltway are finalized.

Ramella, Joseph

Dunn Loring, VA 22027

10/9/2015 10:22:14 PM

Subject: True focus on Multi-modal first

The VDOT I66 expansion project outside the beltway has not taken appropriate measures to assess and study all options that will alleviate congestion, reduce environmental air quality impacts, save taxpayers billions and evaluate true multi-modal transportation options.

VDOT charter has priority on building new roads first, not on what are the best solution for transportation issues. If VDOT is asked, it will always propose building more roads. Not surprising that their I66 solution mainly focuses on expanding the footprint of the existing I66 highway and adding tolls which allows them to complete a bad tolling investment on I495 and I95.

VDOT should completely study all options available on I66, to include NOT adding more road, and implementing HOV3 now during rush hour (would not require an expansion), adding bicycle route, adding rapid bus transit (would not require an expansion) and look at funding metro or another rail option beyond Vienna.

Adding more lanes with tolls is only encouraging more cars and adding more air pollution. It will NOT alleviate congestion. The current VDOT studies on the expansion are self serving and focused on a solution with new road. The VDOT studies are conflicted and show a projected worst case congestion results, if nothing is done; compared with projected exaggerated best case results if the highway expansion and tolls are added.

VDOT should exhaust implementing as many multi-modal options before building new roads. I am strongly against the current design plan.

Rampey, Matthew

Bristow, VA 20136

10/9/2015 3:13:51 PM

Subject: Support Northern Virginia I-66 Projects for Inclusion in 2015 CLRP Amendment

Upgrading the I-66 corridor is long overdue.

I urge the National Capital Region Transportation Planning Board to support the Northern Virginia I-66 Corridor Improvements Outside and Inside the Beltway for inclusion in the 2015 Constrained Long Range Plan (CLRP) amendment.

Outside the Beltway, I urge the Board to adopt the proposed Alternative 2B to include three conventional and two managed lanes in each direction with a median reservation for future transit.

Inside the Beltway, additional lanes and transit are needed now. Toll revenues should be dedicated for additional lanes and transit starting in 2017, and new lane construction should begin by 2020.

I-66 is an integral link and connector for virtually every Northern Virginia jurisdiction and major activity center.

Today, I-66 congestion outside and inside the Beltway is crippling our region.

New highway and transit capacity inside and outside the Beltway are essential to future regional economic viability, global competitiveness, quality of life and homeland security.

Please support the inclusion of these two projects in the 2015 CLRP.

Ranatunga, Ruwani

Dunn Loring, VA 22027

10/10/2015 11:01:37 PM

Subject: Oppose I-66 Outside the beltway project.

I am a resident in Dunn Loring. I oppose the Northern Virginia I-66 Corridor Improvements Outside the Beltway for inclusion in the 2015 Constrained Long Range Plan (CLRP) amendment.

Scheufler, Mark

Manassas Park, VA 20111

10/7/2015 5:57:42 PM

Subject: I-66 Multimodal Improvement Project inside the Capital Beltway

How much would the average and peak toll decrease by adding an additional eastbound lane from the Dulles Connector to Ballston?

What is the expected yearly toll revenue surplus to implement multi-modal projects?

How much additional surplus revenue is expected to be generated by adding an additional eastbound lane from the Dulles Connector to Ballston?

Recommend the surplus toll revenue be administered by the Northern Virginia Transportation Authority (NTVA) instead of the Northern Virginia Transportation Commission (NVTC)

Recommend tolling to start in 2021 with the completion of the Transform I-66 Outside the Beltway Project and Phase 2 of the Silver Line Metrorail project.

Recommend a \$250 Million list of ranked projects be developed before toll begins. Recommended NVTA borrow money using the anticipated surplus toll revenue as collateral to begin implementing projects before 2021.

Subject: I-66 Corridor Improvements outside the Capital Beltway

Dear TCB,

Since February 15th I have been voicing my concerns about the I66 Expansion. I have worked hard with a group of concerned neighbors, talked a number of times with VDOT, WMATA and Fairfax County. All these points have been raised with Susan Shaw and Mr. Chang.

Three General Purpose Lanes are insufficient for handling local traffic I need to point out that your proposed 3 general purpose lanes will not be able to handle the local traffic. I live in this area, and I am unable to get from Dunn Loring to the Fair Oaks or Fair Lakes shopping centers during rush hour and non rush hour. Thus your design will not work. You will make traffic worst going from 4 to 3 general purpose lanes.

Recommendation, instead of 3 GP and 2 ML, build 5 GP lanes so all tax payers benefit!

Impact and Solution to Dunn Loring Metro Station -- not address VDOT has had over 8 months to come up with a plan. I have talked to WMATA. They have no plans to change anything on Dunn Loring Metro.

- a) There is not enough room to expand Gallows Rd from 4 to 6 lanes without impacting the existing Dunn Loring Metro platform structure. Why has VDOT and WMATA not come up with a solution.
- b) How will people get access to the DL Metro when the pedestrian bridge is extended?
- c) Where can you move the power station, with the new construction, there is not a place to put it.

These questions identify the cost risk to the project that VDOT has had plenty of time to address and has chosen not to address them. This needs to be resolved before going forward with the project.

Gallows Entrance to Stenwood Elementary School -- not addressed Increasing the number of lanes from 4 to 6 lanes in front of Stenwood Elementary will increase safety concerns for parents dropping off and picking up children. This point was identified to VDOT 4 months ago with no response. Currently Gallows Rd traffic moves over the speed limit, and block the entrance to the school. This will make the situation worst.

I66 Managed Lanes Encourages Sprawl at the expense of Local Travelers

The proposed I66 managed lanes encourages people to move to locations where they can get access to managed lanes. This moves choke points and makes traffic worst for people without access to the managed lanes. We need a solution that benefits everyone, not a subset of the population at the expense of others paying higher property taxes.

Light rail design and cost

I want to see a design and cost for a light rail alternative. Commuters need mass transit options, not more roads. This was to be analyzed in the Tier one study.

Put in the Rapid Bus System now, before construction

Buy and get the rapid bus system now to relieve traffic congestion during construction. People need alternatives to driving i66.

Nutley and I66, no access to Haymarket on ML

Why is there no access to the ML outbound to Haymarket at Nutley? You need access to the ML in both directions.

Gallows Rd Bridge -- Keep at 4 lanes -- taper traffic on bridge

Why can't the traffic on Gallows Bridge be tapered to from 6 to 4 lanes on the bridge. This would save 5 homes on Gallows Rd. The propose Gallows Rd expansion is 20 to 30 years away (if it does happen). So why not let people live there during this time frame?

No way for people on 123 to enter MLs going to the beltway

Why are there no lanes for people on 123 to enter the ML's going towards the beltway and coming off of the beltway? For each intersection, cars should have access to the MLs.

Fair Oaks and Route 50 -- No access to ML going west

At the Fair Oaks and Route 50, there is no way for cars on Route 50 to go West on the managed lanes. I thought the whole idea is get people on ML and free up traffic on the GP lanes.

Want Data Transparency on i495 "Success" Managed Lanes -- Google Traffic say not!
VDOT claims that the i495 Managed Lanes are reducing congestion. Please provide the data so there can be an independent data analysis. The VDOT ML on i495 have created a bottleneck on the inter loop where the ML merge with the inter loop. This can be verified by the Google traffic density report in morning an evening rush hour. Personally, this has made my morning commute to my corporate headquarters worst. Traffic is backed up before Tysons Corner. The I66 expansion will make this bottle neck worst. Traffic will be grid locked past I66 and 495. If we know that the ML do not work, why are we building them?

The bottom line is that there are a lot of unanswered questions and lack of transparency. Going from 4 general purpose lanes to 3 just does not make sense. The other 2 lanes are only accessible by a small group of Virginia residents that do not live in our area. Dedicating 40% of I66 to benefit a subset of commuters at the expense of everyone else that do not have access to the managed lanes does not make sense.

Siems, Rick

Arlington, VA 22207

10/9/2015 3:13:51 PM

Subject: Support Northern Virginia I-66 Projects for Inclusion in 2015 CLRP Amendment

Upgrading the I-66 corridor is long overdue.

I urge the National Capital Region Transportation Planning Board to support the Northern Virginia I-66 Corridor Improvements Outside and Inside the Beltway for inclusion in the 2015 Constrained Long Range Plan (CLRP) amendment.

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Today, I-66 congestion outside and inside the Beltway is crippling our region.

New highway and transit capacity inside and outside the Beltway are essential to future regional economic viability, global competitiveness, quality of life and homeland security.

Please support the inclusion of these two projects in the 2015 CLRP.

Simpson, Mike

Gainesville, VA 20155

10/10/2015 8:39:24 PM

Subject: I66 project

The financial costs of the i66 project are crazy and not necessary. VDOT only wants to build roads. They should consider using existing road and making HOV 3 during rush hour. This is very little costs. Addition funding should be considered for a rapid bus system and extending metro or considering other rail type solutions past Vienna. I am against this project.

Trencheny, Robert

Alexandria, VA 22304

10/9/2015 9:00:53 PM

Subject: Express Tolls

I am writing with a concern with the proposed EZ Pass Express lanes on I-66 inside the Beltway. I have used other EZ Pass tolls in Virginia and often feel cheated by the State of VA and the company operating the tolls.

First the toll rate needs to be controlled by the state. Paying \$8.00-10.00 to drive a few miles is taking advantage of Virginia tax payers. The rates need to be lower.

Second, the posted rate needs to also estimate how much time I will save. This can be easily calculated by EZ Pass. I have been ripped off by this company when I assumed paying a high rate would save me a large amount of time. However, once I drove the road it was apparent there was no traffic jam on the non-pay roadway and I paid for something that had no real value. So I feel taken advantage of by a company doing business with the State of Virginia. I need Virginia to protect its citizens, not collude with a private corporation to take advantage of us.

I agree that traffic and transit in NoVA are terrible and something drastic needs to be done. I just hope that the State of Virginia puts the citizens first.

Thank you

Ung, Ben

Dunn Loring, VA 22027

10/10/2015 9:36:56 PM

Subject: I66 outside of beltway - community & environmental impacts

I live in Dunn Loring and I like to walk to my school. It is only 10 minutes of walk from my home to school. I do not want Gallows Road to be widened because I wish to continue to walk to school without any safety concerns and air and noise pollution. If my home is taken, I will not be able to walk to school and my parents will need to drive me to and from school, which will add to the traffic congestion. I do not wish my home to be taken for Gallows Road expansion and bike trail because I love my school and neighborhood and do not wish to move away. Many children walk and play in the neighborhood and it is not safe to have more bikers and strangers on Stenhouse Place. Please save my home and neighborhood. Thank you very much.

Williams, Mary

Vienna, VA 22180

10/8/2015 3:28:46 PM

Subject: I-66 outside the beltway

CTB does a very good job of listening just to pacify, then doing what the special interests and back-door deals compel them to do. The proposed changes to I-66 outside the beltway will do nothing more than add more traffic to parallel roadways and diminish interest in Metro ever considering an extension to the orange line. More attention should be paid up front to cultivating more public transportation options BEFORE breaking ground on any other project. There should be commuter lots built all along the I-66 corridor, encouraging the use of slug lines. The shoulder lane should be open to express buses during commuting hours.

Subject: Support Northern Virginia I-66 Projects for Inclusion in 2015 CLRP Amendment

Louise and I agree that upgrading the I-66 corridor is long overdue.

I urge the National Capital Region Transportation Planning Board to support the Northern Virginia I-66 Corridor Improvements Outside and Inside the Beltway for inclusion in the 2015 Constrained Long Range Plan (CLRP) amendment.

Outside the Beltway, I urge the Board to adopt the proposed Alternative 2B to include three conventional and two managed lanes in each direction with a median reservation for future transit.

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Please support the inclusion of these two projects in the 2015 CLRP.

Submitted by: An Organization

Buchanan, Bob
2030 Group

Gaithersburg, MD 20878

10/7/2015 3:20:47 PM

Subject: Comments on the Draft 2015 CLRP Amendments & Performance Analysis to Transportation Planning Board

See attached letter.

Davis, Susan

Sterling, VA 20166

10/9/2015 1:03:48 PM

Committee for Dulles

Subject: Comment regarding draft 2015 amendment to the CLRP and Air Quality Conformity Analysis

See attached letter.

Hii, Kwong

Dunn Loring, VA 22027

10/10/2015 11:10:08 PM

Save Dunn Loring

Subject: Oppose I-66 Outside the beltway project.

I am a resident in Dunn Loring. I oppose the Northern Virginia I-66 Corridor Improvements Outside the Beltway for inclusion in the 2015 Constrained Long Range Plan (CLRP) amendment.

I believe that the public deserves a wider range of alternatives for fixing I-66 Outside the Beltway. Adding more highway lanes is not an effective long-term solution to the transportation needs of residents and commuters in the I-66 Corridor. All of the current proposed alternatives would cause enormous disruptions to many communities and have significant impacts on neighborhoods, our air, and streams. VDOT's environmental analysis does not adequately study these impacts or possible alternatives that would avoid these impacts entirely.

Any long-term solution on I-66 must include a focus on building more walkable and bikeable communities near transit. More and more businesses want to locate near transit, and more and more people want to live near transit. Although advertised as toll-funded, VDOT's estimates show that this project will cost one to two billion dollars over projected toll revenues.

A major transportation project of this magnitude should offer real transportation options for the future, putting transit first and providing needed connections for biking and walking. I-66 could add new bus transit service without needing to add any new pavement. VDOT should also focus on fixing bottlenecks such as the Route 28 interchange before committing to such an expensive and disruptive course of widening the entire 25-mile stretch of the highway.

Hiteshue Smith, Nancy

McLean, VA 22102

10/9/2015 1:02:06 PM

Northern Virginia Transportation Alliance

Subject: Comments on CLRP Amendments and Performance Analysis

See attached letter.

Larsen, James

Chantilly, VA 20151

10/10/2015 11:07:38 PM

Dulles Area Transportation Association

Subject: Letter of support from DATA re:CLRP 2015 Amendment

See attached letter.

Lindgren, Jon

Chantilly, VA 20151

10/9/2015 1:05:52 PM

Northern Virginia Building Industry Association

Subject: NVBIA/I-66 Corridor Support Letter

See attached letter.

Meurlin, Keith

Dulles, VA 20166

10/9/2015 1:07:52 PM

Washington Airports Task Force

Subject: I-66 Corridor Improvements Comment

See attached letter.

parnes, Jeffrey

Merrifield, VA 22116-3913

9/11/2015 7:55:01 AM

Fairfax County Federation of Citizens Associations

Subject: Testimony on the I-66 Outside Beltway Environment Impact Statement

The Federation provided the attached testimony to VDOT on the I-66 Outside Beltway Environment Impact Statement. It does not seem that any of our transportation related points were incorporated, and we believe that they have merit and should be considered before the the TPB approves the addition of the I-66 Outside Beltway project to the CLRP.

Pollard, Tim

Richmond, VA 23219

10/10/2015 11:07:38 PM

Southern Environmental Law Center

Subject: Letter of support from DATA re:CLRP 2015 Amendment

Attached are the comments of the Southern Environmental Law Center on the draft 2015 CLRP.

Schwartz, Stewart

Washington, DC 20002

10/10/2015 11:07:38 PM

Coalition for Smarter Growth

Subject: CSG Comment on the 2015 CLRP

Attached comments with two enclosures related to I-66 outside and inside the Beltway.

Snyder, David

Washington, DC 20002

10/1/2015 9:36:50 AM

Metropolitan Washington Air Quality Committee

Subject: MWAQC Comments on the Air Quality Conformity Analysis

See attached letter.

Virginia Sierra Club

Subject: Virginia Sierra Club Comments on 2015 CLRP

Our comments focus on both the general approach of the proposed Constrained Long Range Plan, particularly against regional goals, and two specific proposed additions to the CLRP, the I-66 Inside the Beltway and Outside the Beltway projects.

In regard to the overall CLRP, we appreciate that the Transportation Planning Board is moving toward a more performance-based approach. As one example, the Regional Transportation Priorities Plan which the TPB approved in 2014 provides a good set of benchmarks for assessing whether and how our transportation investments are moving the region forward.

The analysis of the CLRP against the RTPP indicates that we still have significant challenges in meeting regional goals through the current CLRP. The east-west divide between housing and jobs will worsen, even though the eastern side of the region has significant underutilized lands near transit stations that could accommodate office and business growth. There is also not sufficient funding to expand Metro's capacity, which is critical to relieving pressure on our road network.

The first two goals of the RTPP are to provide a comprehensive range of transportation options and promote dynamic activity centers, with a focus on transit-oriented development. These goals are the right ones for many reasons.

Increasingly employers and skilled workers are seeking to locate in walkable, transit-oriented communities. Focusing on expanding transportation options and building around transit is key to the region's economic competitiveness. In addition, the transportation sector is the largest source of carbon emissions in the National Capital Region. Any serious approach to regional global warming solutions must have a more aggressive plan for curbing carbon emissions from vehicles.

The overall package of transportation investments in the CLRP are not well aligned with the goals of the RTPP or the Council of Governments' Region Forward plan. The local and state transportation plans that feed into the CLRP are overly focused on expanding capacity for a single mode, single-occupancy vehicle travel. Many of the proposed road expansions should be revisited. For example, the plan to widen Chain Bridge Road to eight lanes through Tysons Corner is not compatible with fostering transit-oriented development at Tysons. Building the Bi-County Parkway will shift growth away from activity centers and foster more auto-oriented development.

In addition, the CLRP falls woefully short in contributing to the goals for reducing global warming emissions agreed upon by the Council of Governments in 2008. COG set a goal of 80% reductions from the 2005 baseline by 2050. Recent reports by the multi-sectoral working group show a wide and ingenious array of potential approaches to meeting this target. But some of the lowest-hanging fruit is to revisit the countless road expansion and highway projects and double down on a transit-oriented development approach.

We appreciate the addition of Bus Rapid Transit on Route 1 in Fairfax and eastern Prince William County in the CLRP and strongly support efforts to advance this project and secure funding. We would strongly support refocusing local and state planning and funding toward other rail and true Bus Rapid Transit projects such as the Route 7 transit study currently underway between Alexandria and Tysons. Other emerging mixed-use, walkable corridors such as Gallows Road should be eyed for fixed guideway transit improvements such as dedicated bus lanes. Shifting our investments toward transit and toward incentivizing walkable, mixed-use development is necessary to creating truly vibrant activity centers where people want to live and employers want to locate, and to reducing global warming emissions.

In regard to the proposed I-66 projects, we appreciate that VDOT is looking at ways to expand capacity in a highly congested corridor that focus on moving people, not just vehicles. The only viable long-term solution to congestion in the I-66 corridor is to increase transportation choices for residents, commuters and other travelers. For this reason, we support VDOT's proposal to toll I-66 Inside the Beltway during peak hours and use the revenue for multimodal improvements.

For the I-66 Outside the Beltway project, the multimodal components are not well defined. The transit plan included in the project application focuses on long-distance commuter service from large park and ride lots in Prince William and western Fairfax, where the land uses and densities are not well suited to transit. While we support expanding transportation options for all residents, localities have to plan land uses more efficiently for transit to be a viable choice. The draft transit plan calls for off-peak and reverse-peak service to areas that have questionable demand. The projected ridership numbers for the transit plan by 2040 are only 13,000-15,000 riders per day, while parts of the highway such as

the Route 28-Fairfax County Parkway segment alone have more than 10 times that amount of average daily traffic. In addition, VDOT and DRPT have not provided clear information about how the transit plan will be funded.

We believe the project can do much more to boost transit use and should be held to a higher standard for achieving a more balanced mode share between SOVs, HOVs, transit, walking and bicycling. The I-66 corridor includes many areas that are becoming more compact, mixed-use and walkable, such as Dunn Loring, the Vienna Metro station area, the Route 50 corridor in Fairfax City, Fair Oaks, and Centreville. Just outside the corridor are Route 28 and Tysons, where much of Fairfax County's economic growth will be and which are focusing on compact, transit-oriented development. We believe the transit plan could achieve significant improvements in cost-effectiveness and ridership by focusing on bus and transportation demand management improvements serving these areas.

We are also concerned about the phasing of the improvements. Much of the congestion on I-66 is due to limitations of the Route 28 interchange and bottlenecks east of the Route 123 interchange from merging. In our view, a more cost-effective use of potential state and federal funds would be to limit the first phase of the improvements to Route 28, and evaluate the need for further widening only after these improvements have been implemented.

Zelley, Bryan

Vienna, VA 22180

10/10/2015 10:37:06 PM

Transform 66 Wisely

Subject: I-66 Outside the Beltway Comment

The public deserves a wider range of alternatives for fixing I-66 Outside the Beltway and urge the TPB to consider significant environmental impacts of this Virginia project before it is added to the region's Financially Constrained Long Range Transportation Plan. Please see the attached comments.



October 10, 2015

**Comments on the Draft 2015 Amendment to the
Financially Constrained Long-Range Transportation Plan (CLRP)**

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

Enclosure (1): CSG comments on I-66 outside the Beltway
(2): CSG comments on I-66 inside the Beltway

Dear Chairman Mendelson and Members of the Transportation Planning Board:

Please accept the following comments on the Draft 2015 Amendment to the Financially Constrained Long-Range Transportation Plan (CLRP).

A) The CLRP analysis shows the very clear benefits of DC's revitalization and the region's investment in transit-oriented development, which increase walking, biking and transit trips and contribute to a decline in vehicle miles traveled (VMT) per capita, air pollution and greenhouse gas emissions, while probably also reducing the magnitude of VMT growth. This demonstrates that an even greater focus on reducing sprawling development, focusing development in walkable, transit-oriented centers, addressing the east-west jobs divide, and shifting more funds to transit, biking and walking to support the activity centers would result in better results, further reducing VMT, greenhouse gas emissions, congestion, and regional inequities. Unfortunately, the CLRP is filled with projects which will fuel sprawling auto-dependent development and undermine the region's commitment to walkable, mixed-use, transit-oriented development (TOD), while under investing in new transit capacity, failing to target enough street network projects to support walkable activity centers, and worsening the regional economic divide. In short, the CLRP fails to make the fundamental shifts that many TPB members have long called for. Therefore, by most measures the CLRP is a failure, and it fails in some very important respects.

1) It not only fails to address the region's long-standing regional economic divide, but it contributes to making that divide worse than it is today. It leaves lower-income and significant minority communities isolated from a larger share of future jobs.

2) It falls far short of what's needed to address climate change.

3) It fails to adequately address most of the Regional Transportation Priorities Plan goals to improve accessibility through investments in transit, biking and walking.

4) It fails to address Metro needs including long-standing core capacity needs such as 8-car trains, other components of Metro 2025, and Metro 2040.

5) It fails to address, and actually fuels, outer suburban sprawling development through major road expansions, which generate very long commutes and significant congestion on the major highway corridors. At the same time, it shows that the "inner suburbs" of Fairfax, Montgomery and Prince George's, with their large populations, do not make enough progress in shifting mode share to transit, walking and bicycling.

Therefore, we urge rejection of the Constrained Long Range Plan.

What follows is further discussion and specific critiques of the CLRP, along with attachments concerning the proposals for I-66 inside and outside the Beltway.

Our criticisms are not new, but the issues stand in starker relief than ever.

B) Once again, the 2015 CLRP Amendment report (in Chapter 2, CLRP Process, pages 7 to 9) fails to adequately discuss important COG guiding documents and goals including Region Forward, Access for All, and Climate Report. It fails to note the heavy emphasis in the Regional Transportation Priorities Plan on transit, walking and bicycling accessibility to transit and within activity centers, and environmental protection including open space preservation. Year after year, TPB members have asked for the plan to be dramatically changed to better meet the sustainability, equity and accessibility goals of these approved guiding documents. Yet, too little has changed.

Returning in more depth to the five points raised above:

1) Despite spending \$43 billion on new transportation capacity the region becomes more divided. The stunning map on page 31 of the 2015 CLRP Amendment report illustrates the stark divide, and the report itself states (page 30): "Significant declines in job accessibility by automobile are expected on the eastern side of the region," citing congestion and "the fact that more of the new jobs anticipated between now and 2040 are forecast to be located on the western side of the region, outside of a 45 minute commute for those living in the east." The report (page 37) also notes that "greater transit crowding in the regional core" is a result of the east-west jobs imbalance, and that there is "significant unused transit capacity in reverse commute directions" (presumably including travel to stations in Prince George's County). Furthermore, the CLRP does not fund the core capacity needs of Metro, contributing to the crowding and harming access to jobs for residents. The east-west divide disproportionately affects lower-income and Black and Hispanic communities -- worsening disparities between today and 25 years from now -- disparities that were highlighted 16 years ago in the 1999 Brookings' report "A Region Divided."

2) While the plan illustrates CO2 reductions of 22% between 2015 and 2040 and 44% per capita, it does not provide a comparison to the 2005 to 2050 goal of an 80% reduction overall for all sectors, nor to the first goals set by climate scientists for an 80% reduction below 1990 levels by 2050. The COG Multi-sector Climate Working Group report shows that even with energy sector, building conservation, better fuels, and land use shifts to activity centers, the region would still fall 27.7 percent short of COG's 2050 goals. The CLRP doesn't include anything close to the land use shifts that the multi-sector working group so would fall even farther short. The multi-sector working group refused to evaluate significant increases in transit investment beyond the CLRP or major shifts from highways to transit in order to close the gap. While terming massive shifts in the energy sector to be "viable and implementable," despite the

vehement opposition by major industry groups to these shifts, the multi-sector working group -- under pressure from two of our three state departments of transportation -- refused to consider major increases in transit funding or shifts from highways to transit as "viable and implementable." This doesn't pass logical muster. Like the multi-sector working group report, the CLRP similarly fails to invest adequately in transit or to shift spending on sprawl-inducing highways and arterials to transit and the local street networks necessary to support compact, walkable activity centers.

3) The Regional Transportation Priorities Plan was reduced to three priorities, which fail to represent how much focus the discussions and plan placed on transit, walking, bicycling and accessibility. The three state priorities are: "Meet our existing obligations"; "Strengthen public confidence and fairness"; and "Move more people and goods more efficiently." Looking closely at the third one, it emphasizes the benefits of demand-side strategies, multimodal solutions, and concentrating growth in activity centers. Out of the list of 14 strategies under this priority, nine relate to transit, bike, walk and activity center investments, one to electric vehicles, two to operational efficiency of roadways, one to road bottlenecks and one to tolling. So there is a very heavy emphasis in the RTPP on transit, bike/walk, demand-reduction on the roadways, and land use, but that emphasis is not reflected in the CLRP. While the CLRP shows progress, it doesn't go far enough, and the 2015 CLRP report acknowledges that "The region has unfinished business when it comes to maximizing use of existing transit systems. The CLRP does not include funding for proposals to add capacity to the existing Metro system (specifically the Momentum Metro 2025 package of improvements), including all eight-car trains during rush hours and core station improvements. This shortfall remains unchanged from 2014."

4) As noted in number three, the CLRP once again fails to invest in Metro's core capacity needs and the Metro 2025 plan, while also failing to consider the capacity needs outlined in the Metro 2040 plan. While it includes some new bus priority and BRT projects, it fails to provide the full regional transit network and transit frequency the region needs. It also fails to evaluate the recent findings of WMATA planners in the Connect Greater Washington project which shows that full build-out of TOD at existing and planned Metro stations would not only provide more sustainable land use, it would eliminate the Metrorail operating subsidy and generate a surplus.

5) The CLRP's contribution to fueling more sprawl, long-distance commutes, and congestion along major highway corridors is found in the extensive lists of highway and arterial expansions in the "inner" and outer suburbs, including some "outer-outer suburbs" as measured from DC. These include the following:

In Maryland: expansion of Routes 3, 4, 5, 32, 210 and 301; I-70, I-270, the Brookeville Bypass, MD28/198, M-83, the Montrose Parkway, and dozens of other arterial road expansions including many outside the Beltway in Prince George's, which will induce more development in auto-dependent areas, and divert revenues needed to support compact, mixed-use, walkable and transit oriented development.

In Virginia: further expansion of I-66 west to Haymarket, and I-95 HOT lanes south to Route 3 in Fredericksburg/Spotsylvania, the Bi-County Parkway and Manassas Battlefield Bypass, Route 17 expansion to Caroline County, and dozens of other arterial expansions in Loudoun, Prince William, Stafford, Spotsylvania, and Fairfax.

The CLRP finds that overall congestion rises by 72% even though population grows by 24%, and that congestion will be concentrated on a few key segments of our region's roadways. The maps show these segments as the Greenway in Loudoun, I-66 between Haymarket and Gainesville and in Fairfax, I-95 in Prince William, I-70 NW of the City of Frederick, I-270 from Frederick to Montgomery, I-95 and the BW Parkway in Prince George's, and on the Beltway where eastside residents are trying to get to jobs in the west. This is an indication of the impact of both sprawling development 25 miles or more beyond the

core, and the east-west economic divide.

The CLRP shows very poor performance in terms of transit, walk and bicycle mode shares in the outer suburbs and too little progress in the inner suburbs. In 2040, the outer suburbs show 73% of work trips in single-occupant vehicles, just 8% on transit, and just 2% walk/bike. For the inner suburbs it shows 61% in single occupant vehicles, 24% on transit and 4% bike/walk, but given the large populations in the inner suburbs and potential for TOD, these jurisdictions should be able to achieve a greater shift in mode share.

As is widely acknowledged, most of the problem results from our patterns of land use. We believe that the regional household and jobs forecasts continue to presume more growth than will actually happen in areas 25 miles or more from the regional core -- based on the hoped-for growth encompassed in local comprehensive plans, and that the region must develop a new CLRP based upon more sustainable land use patterns. For the growth that takes place in the inner and outer suburbs, there must be an even stronger commitment to making it compact, mixed-use, mixed-income, walkable/bikeable with a strong local street grid and accessible to transit. It is not convincing to say that this is not within the mission of the TPB or its partner MPO's, given that each is comprised of local elected officials representing every jurisdiction and who have primary responsibility for land use decisions.

C) Comments on particular projects:

We remain opposed to and, in a number of cases, have provided detailed comments to the relevant agencies concerning:

- Bi-County Parkway
- Manassas Battlefield Bypass
- Upriver Potomac Bridge crossings beyond the American Legion Bridge (not in CLRP but the subject of intensive lobbying by bridge supporters)
- Montrose Parkway Extended
- M-83
- Expansion of Route 7 and 123 in Tysons as proposed - these should be urban boulevards that are fully and safely accommodate pedestrians and bicyclists.
- Route 4, Route 5, and Route 210 expansion - investing instead in express bus service for these corridors and funding be directed to implementing TOD in Prince George's and Waldorf
- Route 32 expansion

We have concerns and have recommended alternatives to the following:

- I-66 HOT lanes outside the Beltway (see Encl 1)

We are supporting:

- All listed transit investments
- I-66 HOT/HOV/Transit inside the Beltway (see Encl 2)

We recommend that:

- Route 1 BRT in Fairfax be advanced to 2020 from 2030
- High capacity transit be restored to Columbia Pike.
- The Montgomery BRT network be incorporated for construction and the Fairfax transit plan be completed for future addition to the CLRP
- Expansion of Route 7 to six lanes in Fairfax west of Tysons be predicated on the new lane being a dedicated peak hours bus/HOV lane

- Similar arterial expansions to six lanes only be permitted if these are dedicated transit lanes -- all day where density and demand merit it, and peak hour in other cases
- Metro 2025 be fully incorporated in the plan including core capacity investments and full 8-car trains. Following additional review, components of Metro 2040 should also be included
- The CLRP identify the packages of projects that support local trips within the activity centers and the new transit necessary to connect the centers
- The WMATA Connect Greater Washington recommendation of full TOD build-out be supported by the plan
- I-270 expansion to Frederick be limited to an express bus/HOV lane in each direction.

Time does not permit us to provide additional specific comments many other projects in the extensive list that comprises the CLRP.

To conclude, we continue to recommend fundamental reevaluation of the CLRP and of the land use planning problems that lie at the core of our transportation challenges. We also urge regional officials to address transit funding shortfalls and shift funding from highways and arterials to transit and the local networks that support walkable, mixed-use development. For additional comparison of road versus transit spending we recommend that the private costs of car ownership be calculated and included in the road expenditures. We ask that packages of road, transit, walk and bike investments be applied to supporting development in Activity Centers and that these packages be listed in the CLRP and cross-referenced to the relevant Activity Centers.

For the reasons stated above, we recommend rejection of the CLRP before you.

Thank you for the opportunity to comment.

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 (1)

October 10, 2015

**Comments on the Draft 2015 Amendment to the
Financially Constrained Long-Range Transportation Plan (CLRP)**

I-66 Outside the Beltway Project

To address travel demand and congestion on I-66, we have repeatedly recommended to the Virginia Department of Transportation (VDOT) that they apply a land use and transit first approach to I-66. We recommended this to the previous state administration and the current one. Neither studied the composite alternative we recommended, which includes transit-oriented development, rural land conservation, dedicated lane express bus, VRE, future Metro, transportation demand management, and targeted fixes like the Route 28/I-66 interchange. This approach would move far more people per hour, address the underlying land use problems contributing to more auto-based commuting and traffic, minimize impacts on neighborhoods, and reduce air pollution and greenhouse gas emissions.

VDOT, however, is not supporting this smart growth and transit-first approach. As a result, we urge the Transportation Planning Board to call for study of such an approach or, in the alternative, to help shape the HOT lanes proposal to achieve the most public good. Before including the I-66 Outside the Beltway Project in the draft 2015 amendment to the Financially Constrained Long-Range Transportation Plan, the TPB should ensure VDOT does the following:

- Launch the promised express bus services outlined in the Environmental Impact Study along I-66 HOT lanes at its opening;
- Provide substantial funds for transit, bike, and pedestrian projects from the toll revenue;
- Fix the Route 28/I-66 interchange and Braddock Road intersection on Route 28 to address the major problem area in the west;
- Fund expansion of VRE commuter rail to provide long-distance commuters an alternative to I-66
- Reserve right-of-way for future extension of Metrorail;
- Improve bike and pedestrian commuter routes including access to new I-66 transit;
- Make sure homes, parks, schools, streams, and historic resources are minimally impacted; and
- Extend the HOT lanes only to Route 28 to reduce costs, reduce sprawl impacts, ensure more funding for transit investments, and address the most significant traffic -- within Fairfax from Route 50 east to the Beltway.

The Coalition for Smarter Growth also favors public ownership of the new I-66 HOT lane facility, because of the shortcomings we have seen in public-private tolling arrangements:

1. They have meant loss of control over the revenues from toll roads that could otherwise be

invested in corridor transit were the facilities publicly owned, including Metro 8-car trains, rapid and express bus service, VRE, and future Metrorail extension.

2. Funding for transit was dropped out of the I-495 and I-95 deals, meaning the private companies are collecting large profits while the public must find the funds to add transit.
3. The I-495 and I-95 agreements required the public to pay fees to the private company if too many carpoolers use the lanes.
4. P3 companies press for non-compete clauses that could prohibit the public from adding new transit, including Metrorail, or require the public pay a fee to the company if we do.

The Council of Governments has recognized the importance of smart growth and the transit-first approach to solving our region's transportation, air quality and quality of life goals. Therefore we urge the TPB to call for VDOT to evaluate a transit and land use first approach for I-66 outside the Beltway, and in the alternative, to ensure the HOT lanes proposal is modified as outlined above.

Thank you for the opportunity to comment.

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 (2)

October 10, 2015

**Comments on the Draft 2015 Amendment to the
Financially Constrained Long-Range Transportation Plan (CLRP)**

I-66 Inside the Beltway Project

The Coalition for Smarter Growth supports VDOT's proposal for I-66 inside the Beltway including the following:

- High-Occupancy Toll (HOT) lanes will continue to operate in both directions, but only during peak hours (am/pm);
- Conversion of the current HOV+2 to HOV+3 should be made when the HOT lanes outside the Beltway are opened and that carpools and transit will not pay tolls;
- Unlike other northern Virginia HOT lane projects, the HOT lanes on I-66 Inside the Beltway will be publicly owned, preventing net toll revenues from going to private profits and instead used to fund transit and other multi-modal projects to move more people quickly through the corridor and further reducing congestion;
- Transit investments from the toll revenues should prioritize improved bus service (rapid bus service and commuter express bus service) along I-66 and on parallel routes, such as Route 50, and Route 29/Lee Highway. Additionally, funding could include 8-car trains for Metro Rail;
- Net revenue from the toll road should be used and additional investments should also be made in pedestrian and bicycle connections to transit stations and work destinations, a perfectly acceptable use of toll revenue funding that meets the federal requirements outlined by the Meeks case.

We also support the project because:

- The entire HOT+3 and transit package will provide a faster, more reliable commute;
- The project is not expected to negatively impact homes, neighborhoods, parks, and the bike trail.
- This project would provide funding to expand and encourage more transit use and carpooling
- With the option for single-occupancy vehicles (SOV) to pay for access to I-66 HOT lanes during peak hours, many SOV trips could shift back to I-66, diverting these SOV away from parallel routes (Route 50 and 29) and reducing congestion on these arterial routes.

We fundamentally disagree with those who continue to press for widening of I-66 all the way to the Roosevelt Bridge.

- Widening fails to account for induced demand which would fill the road again, creating

congestion and unreliable commutes for even more people.

- The vehicles have nowhere to go once they reach DC or the streets of Arlington -- we can't widen historic Constitution Avenue and streets in DC and Arlington without significant harm to these communities.
- The limited right-of-way east of Ballston would mean destruction of homes, neighborhoods, parks and one of the region's most successful commuter and recreational bike and pedestrian trails
- The cost of widening would be in the hundreds of millions of dollars and orders of magnitude more than the HOT/HOV/transit approach.
- The HOT/HOV/transit approach could be implemented much, much faster, without the years of construction-related delays created by widening.

The VDOT proposal is in fact the most effective and efficient approach and we recommend that the TPB endorse it, subject to clear provisions that widening not be allowed east of Ballston, that any widening west of Ballston not occur until 2025 or later, and that this widening not occur before evaluating the performance of the HOT/HOV/transit package, including actual implementation of new transit services.

Thank you for the opportunity to comment.

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



Fairfax County Federation of Citizens Associations, P.O. Box 3913, Merrifield, VA 22116-3913

**Approved by the Fairfax County Federation of Citizens Associations
Executive Committee at its 30 June 2015 meeting:**

Input on the I-66 Multimodal Improvements Inside the Beltway

The Virginia Department of Transportation is proposing to convert an existing section of the Interstate Highway System, whose use is currently limited to High Occupancy Vehicles containing two or more persons (HOV-2) inbound in the morning, and outbound in the evening, to HOV-3 and tolled (HOT) use during both the morning and evening commute in both directions. It is expected that many drivers who currently commute in what is considered the reverse direction and are not presently paying tolls, will choose to use the streets of Arlington instead of paying the varying-rate toll, joining the current non-HOV commuters who travel inbound in the morning and outbound in the evening on the same streets.

The Fairfax County Federation of Citizens Association offers the following recommendations for consideration by the Commonwealth Transportation Board prior to making a formal decision on this proposal:

A. Collection and Use of Funds: As the Federation stated in its testimony on the I-66 Outside the Beltway Improvements¹ “if tolling is implemented, funds collected should be used to reduce congestion along the corridor, including mass transit, and not be used for improvements indiscriminately throughout Northern Virginia”.

Changes in the corridor that need to be considered as part of the I-66 conversion include:

- 1. I-66 Widening:** The short-term six-laning of both directions of I-66 inside the Beltway: the projected period of 2025-2040 is too late to address even the traffic safety and operational problems that are already being observed on a regular basis along this portion of the I-66 travel corridor. Any determination as to that need should be made much sooner within a maximum of five years rather than a decade out.

¹ <http://www.fairfaxfederation.org/testimony/TestimonyI66MultiModalStudyTier120150603Ver1.pdf>

**Fairfax County Federation of Citizens Associations Executive Committee
Input on the I-66 Multimodal Improvements Inside the Beltway**

2. Parallel Roads: Improvements to all of the major parallel roads that will be burdened by increased use by non-HOT commuters. These other facilities include, but are not limited to:

- Arlington Blvd (US Rt. 50)—We would suggest that this route be widened to a basic 6-lane, suburban arterial type cross-section from the Capital Beltway interchange to the Washington Blvd (VA Rt. 27) interchange at Fort Myer. We would also recommend a major reconstruction and improvement to the existing Seven Corners interchange complex, which is a continuing traffic bottleneck
- Lee Highway (US Rt. 29)
- Old Dominion Dr. (VA Rt. 309)
- Washington Blvd (VA Rt. 237)
- Wilson Avenue

B. Metrorail: Metrorail service in the in the Vienna/Reston/Rosslyn corridor is limited by the capacity of the existing Rosslyn Potomac River tunnel. Virginia cannot wait until Metro's Momentum 2040 plan for additional river crossings. In addition, consideration needs to be given to the construction of a wye-junction that will allow for a direct Metrorail service option between Dulles International and Reagan National airports, as well as allowing Fairfax, Loudoun, and Prince William county commuters to travel from the north and west to the employment centers of Alexandria, Crystal City and the Pentagon without transferring at the capacity-constrained Rosslyn station.

**Fairfax County Federation of Citizens Associations Executive Committee
Input on the I-66 Multimodal Improvements Inside the Beltway**

C. Dulles International Airport Access Road Connector: Although the project website indicates that “the project area includes I-66 Inside the Beltway, from I-495 / Capital Beltway to U.S. Route 29 in Rosslyn, as well as the Dulles Toll Road,” the full Dulles International Airport Access Road connector from I-66 to the Beltway is not in the green-highlighted section as shown in the below image taken from the website².



Commuters on VA Rt. 267, the Dulles International Airport Toll Road, now pay a toll to travel to the Beltway but are not allowed to travel on the extension from I-66 to the Beltway during the HOV-restricted times. It would seem logical that these commuters, used to paying a toll, would be prime candidates to continue on a tolled route, but there doesn't seem to be plans for them to do so as part of this project. We recommend that the Dulles International Airport Access Road connector be included in the plans for HOT use, as well as plans put in place so that current traffic to and from Dulles International Airport can continue to use I-66 during HOT-restricted times, and not be forced to pay a toll to use the road.

² <http://inside.transform66.org/>

**Fairfax County Federation of Citizens Associations Executive Committee
Input on the I-66 Multimodal Improvements Inside the Beltway**

D. Bus Rapid Transit: In our I-66 outside the Beltway testimony, referenced above, the Federation advocated the use of Bus Rapid Transit (BRT) west of the Vienna Station in the interim period before the Orange line is extended to the Centreville area, as has been included in the Fairfax County Comprehensive Plan for well in excess of 20 years. Until the Rosslyn Potomac River tunnel bottleneck is resolved, BRT should be planned to continue to employment centers in Ballston, Crystal City, Pentagon and the District of Columbia. The critical considerations are the junction between the BRT and Metro, and a methodology for the BRT passengers to continue to their destinations identified above without having the passengers wait for long periods of time.

D. Uniform Hours of Operation: Currently the HOV hours for I-66 sections inside and outside the Beltway have different start and end times. In addition, in past years, HOV restrictions were also non-uniform. If HOT lanes are implemented for both I-66 sections, the HOT requirements and the hours of operation should be coordinated so both sections are uniform, rather than having non-uniform HOT requirements and start and end times for each section.



October 9, 2015

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

Dear Chairman Mendelson:

The Northern Virginia Building Industry Association (NVBIA) represents approximately 600 local and regional businesses and more than 10,000 of their employees. Transportation is important not only to the viability of the homebuilding industry and its employees, but also to each and every family that chooses to call Northern Virginia home. As such, improving our regional transportation network is essential for sustained regional prosperity and security.

The Northern Virginia Building Industry Association urges the National Capital Region Transportation Board to support the inclusion of the following two projects in the 2015 amendment to the region's financially Constrained Long-Range Plan.

VIRGINIA

- **I-66 Corridor Improvements Outside the Capital Beltway** – Implement Alternative 2B to reconfigure I-66 between I-495 and Route 15 in Prince William County in both directions to 3 general purpose lanes, a hardened shoulder and 2 managed express lanes for toll, HOV-3 and transit with right of way set aside for future transit extension.
- **I-66 Corridor Improvements Inside the Capital Beltway** – VDOT to upgrade the corridor by:
 - Converting I-66 inside the Beltway to a peak-period managed toll/express lane facility in both directions, increasing HOV-2 to HOV-3 in 2020.
 - Using toll revenues to support “multimodal improvements,” including enhanced bus service. We urge that a significant portion of toll revenues should be set aside for widening of I-66 inside the Beltway from the outset of the project.
 - Widening I-66 Eastbound by 1 lane between I-495 and Ballston, if needed, by 2040. We urge that new lane construction, in both directions, begin by 2020. The need for additional capacity during rush hour and non-rush hour and weekends now is obvious.

Additionally, for our region to remain economically competitive we must have a regionally focused strategic transportation plan. We recommend that the CLRP be re-evaluated in terms of which highway, bridge and transit investments do the most from a regional perspective to move the most people in the most cost-effective manner, reducing congestion and travel delays and improving regional connectivity.

Sincerely,

Jon W. Lindgren
Executive Vice President
NVBIA



Washington Airports Task Force
www.washingtonairports.com

October 7, 2015

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

Dear Chairman Mendelson:

The Washington Airports Task Force (WATF) is a results-driven, regional leadership organization whose members understand the important linkage between the global access our airports provide and our regional economy. As a non-profit, non-partisan 501(c)(3) Virginia Corporation, we are focused on optimizing the capacity of Washington Dulles International Airport, and maintaining its balance with Washington Reagan National Airport. The WATF represents, through membership and advisory groups, more than 1,000 business, government, civic, and travel and hospitality industry leaders from Virginia and the National Capital Region.

The WATF considers transportation one of its top priorities, and improving our regional transportation network as essential for sustained regional prosperity and security.

The WATF urges the National Capital Region Transportation Planning Board to support the inclusion of the following two projects in the 2015 amendment to the region's financially Constrained Long-Range Plan.

VIRGINIA

- **I-66 Corridor Improvements Inside the Capital Beltway** – VDOT to upgrade the corridor by increasing lane capacity to accommodate the population growth in the region. We strongly support the need to widen this corridor and add lanes to answer the need for additional capacity. This corridor has become a parking lot during significant portions of the day and evening.

Dulles Airport is a major driver for the region's economy and access to Dulles Airport on the I-66 corridor inside the Beltway is critically important. United States Secretary of Transportation Coleman recognized that fact in his action to approve the construction of Interstate 66 inside the Beltway in his January 5, 1977 decision, section II F, where he specifically noted that traffic to and from Dulles during peak hours would be permitted without restrictions. The WATF urges the National Capital Regional Transportation Planning Board to include this provision in any resolution of support for the project.

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The Honorable Anthony A. Williams
Federal City Council

The Honorable Phil Mendelson

October 7, 2015

Page 2

- **I-66 Corridor Improvements Outside the Capital Beltway** – Implement Alternative 2B to reconfigure I-66 between I-495 and Route 15 in Prince William County in both directions to 3 general purpose lanes, a hardened shoulder and 2 managed express lanes for toll, HOV-3 and transit with right-of-way set aside for future transit extension.

Additionally, for our region to remain economically competitive, we must have a regionally focused, strategic transportation plan. We recommend that the CLRP be re-evaluated in terms of which highway, bridge and transit investments do the most from a regional perspective to move the most people in the most cost-effective manner, reducing congestion and travel delays and improving regional connectivity.

Thank you.

Sincerely,



Keith W. Meurlin

CHANGE DC AREA TRAFFIC WISELY

FEDERAL INTERVENTION NEEDED FOR SOLUTIONS

DC Area traffic is the worst in the nation, yet VDOT's I66 plans are about to make it worse. The super ballooning US Government expanded beyond its DC boundary and now is the direct or indirect employer for most metro area commuters. It is time they step in and help to stop NIMBY's block on traffic solutions, end the Tri-State bickering, fully fund the projects required, and solve this regional and national health, safety, security, productivity, and quality of life issue.

The NIMBYs and piece meal planners have prevented the obvious true solutions for our problems: Outer Rings to Beltway with four-lane bridges across the Potomac River; Outer Rings for the Metro Subways to connect the suburbs; Smart Growth Anti-Sprawl Developments along the new Outer Beltway and train intersections; Orange line subway extension along I66 out to Haymarket from DC; two additional lanes for both inside and outside of I66; increased efficiencies and quantities of buses and all subway lines and trains; and ridding the area of the taxpayer insulting slow-me-down toll roads, and stop-lighted entrance ramps or abnormally steep sky-high ramps.

CONTACT YOUR U.S. OR STATE LEGISLATOR AND TELL THEM YOU WANT A FEDERALLY FUNDED TRI-STATE MANAGED CAPITAL AREA MASTER TRAFFIC PLAN THAT WORKS. TELL THEM...

NO MORE "NIMBYISM", IT'S TOO SELFISH AND COSTLY NOW...

- Needed roads, infrastructure, and alternative transportation systems continually blocked.
- Piece-meal solutions not adequate and 60 years behind.
- Costing region at least \$10B annually in pollution, accidents, productivity loss, health detriments, and loss family time, and a cumulative trillion dollar boondoggle.
- Now a National Security issue as Nation's Capital Area incapable of safety evacuation.
- Officially published as worse traffic in America and a National embarrassment.

NO MORE "TRI-STATE BICKERING", IT'S A FEDERAL THING...

- VA, MA, DC don't agree to and can't afford the necessary roads and alternative transportation systems.
- Local, patch-work, low-budget toll-road paid changes available are inadequate.
- Overcrowding of road network due to ballooning US Government now largest direct and indirect area employer.
- US Government is the main cause of overuse, they are the solution for fixing it. Like original Beltway or Metro implementation and management, a fully funded Tri-State managed commission and master plan can override budget and NIMBY blocks on real solutions.



NO MORE “CHANGES FOR THE WORSE”, TELL VDOT TO STOP!...

- State and US Legislators need to stop VDOT’s I66 plans that will make traffic worse and bring lots of harm, including the privacy, security, safety, quality and viability of a neighborhood public school, but without much benefit to the region in return, with the exception of more efficient buses—that’s a keeper.
- Their plans include many inefficient methods of traffic management, such as Tolls, Sky High Ramps, traffic lights at entrance ramps, and one less non-HOV lane on I66, creating many points where traffic has to stop or slow down.
- Raising the free lane requirement to HOV3 will increase travel costs for most commuters.
- Adding lanes for a few miles only to narrow them back down inside the Beltway spreads the volume out for a while, only to choke at the narrowing bottleneck and where the tolls will be.
- This plan does not reduce traffic volume on I66 because there is still not enough viable route options for local and outer traffic to get to DC or inside the Beltway or to the other side of the river, or for interstate traffic to circumvent DC traffic.
- Additional spillover into the communities will take place because I66 will cost too much, be too crowded in the non-HOV3 lanes, and backed up at the toll areas. As well, community roads will be backed up due to long lines waiting at traffic lighted entrance ramps and access roads.

NO MORE “BAND AID SOLUTIONS”, A BIG PLAN IS NEEDED...

- VDOT’s plan is a Governor’s backed and pride-driven project, and so it needs to be stopped legislatively at the state and national level.
- Since the traffic problem actually comes from the Federal Government boundary expansion, federal intervention is needed to stop the blocks from NIMBYISM and Tri-State disagreements.
- It’s a Constitutional agreement for the U.S. Government to override blocks to interstate commerce and roads and to host defense and productivity for the Nation’s Capital Area and U.S. Government.
- The Washington, DC Area transportation system and infrastructure is a National embarrassment. It is completely sub sufficient to manage this population with only a few parkways, few bridges, one Beltway, few subway lines, inefficient buses, very few two-lane main corridors to DC, and tolls. The overpopulation is using and crammed on most available roads and transit options. It is 50 years behind in development and completely negligent when compared to other major metropolitan areas and being made worse by piece meal band aid solutions.
- It’s time to think big, and to fix the problem once and for all. Like previous co-state infrastructure requirements, the DC Area States have been bound together many times before through federal intervention. In the 1790s, the streets of DC were laid out by the direction and approval of George Washington and created by the Federal government. In the 1850s, the Federal government created the Washington Aqueduct to provide fresh water to the homes in the city. In the 1860s, the Federal government built the military roads connecting the ring of forts defending the Nation’s Capital. In the 1950s, the Federal government built the Capital Beltway. In the 1960s and 1970s, the Federal government built the Metro subway system. Recently, and finally, the 43% federal funded Silver Line is being built with parts already being used. Now it is time to do so much more.

INSTEAD YOU WANT...

A fully federally funded, Tri-State managed Capitol Region Traffic Commission and Master Plan, similar to past methods used for building the Capital Beltway and Metro system, that builds Outer Beltways, adds Outer Ring Metro Lines, Anti-Sprawl Developments, Rte 66 Orange Line Extension, a wider I66 to DC, cloverleaf ramps and lanes without tolls.



October 8, 2015

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

Dear Chairman Mendelson:

The Northern Virginia Transportation Alliance requests that the National Capital Region Transportation Planning Board (TPB) support the inclusion of the I-66 Corridor Improvements Inside and Outside the Capital Beltway in the 2015 amendment to the region's financially Constrained Long-Range Plan (CLRP).

I-66 is one of the region's most important transportation corridors. Year after year the TPB's own analysis also shows that it is one of the area's most congested. To help address this congestion, the Alliance supports additional I-66 lane and transit capacity outside and inside the Beltway.

For the proposed I-66 Corridor Improvements Outside the Beltway, the Alliance requests the TPB support the proposed Alternative 2B, to reconfigure I-66 between I-495 and Route 15 in Prince William County in both directions to 3 general purpose lanes and 2 managed express lanes for toll, HOV-3 and transit with right of way set aside for future transit extension.

For the I-66 Corridor Improvements Inside the Beltway, the Alliance recommends that new lane construction, in both directions, begin by 2020 and a significant portion of toll revenues be set aside for widening of I-66 inside the Beltway from the outset of the project.

The need for additional capacity now in the I-66 Corridor Inside the Beltway during rush hour, non-rush hour and weekends is obvious. In fact, the I-66 Multimodal Study Inside the Beltway (2012), upon which the proposed I-66 Inside the Beltway improvements are based, shows that multimodal packages that add a lane in both directions provide the most multimodal flexibility and do the most to reduce congestion and improve transit and vehicular travel times. So why invest exclusively in the proposed approach that we already know will fail to address 24/7 congestion in that corridor?

Additional I-66 capacity is essential to improving accessibility to many regional activity centers including the District of Columbia, Ballston/Rosslyn, Tysons Corner, Reston/Herndon and Washington Dulles International Airport, as well as Loudoun and Prince William counties. It also is a major regional evacuation corridor and critical to regional homeland security preparedness.

Further, for our region to remain economically competitive we must have a regionally focused strategic transportation plan. We recommend that the CLRP be re-evaluated from a regional approach based on investments that will benefit and move the most people in the most cost-effective manner.

The draft Performance Analysis shows that under the existing CLRP highway and transit congestion worsen, an outlook that threatens our region's ability to add 1.6 million people and 1.1 million jobs and concentrate more people in regional activity centers. The draft Analysis also shows that most people will

NVTA is the only organization focused exclusively on working to make better transportation a reality for Northern Virginia citizens and businesses.

continue to work and live outside the Beltway and our region's fastest growth will continue to be in outer and western suburbs. Yet the obvious need for improved circumferential, suburb to suburb connectivity including new Potomac River crossings and capacity continues to be ignored.

Overall vehicle miles traveled (VMT) continues to increase substantially, as it is the overall VMT not per capita VMT that matters most. And while transit, bike and pedestrian trips are forecasted to increase at higher rates than auto, total auto trips will continue to vastly outnumber all other trips combined. Of the 21 million daily trips forecasted in 2040, 16.6 million will be by automobile vs.1.5 million by transit. That's not to discount transit's importance but to underscore our highway network's importance to regional mobility, prosperity, quality of life and security.

Adding new I-66 lane and transit capacity will significantly improve our region's transportation network. However, the TPB's own data points to why similar CLRP amendments are also needed for I-395, the Maryland Beltway corridor, and the American Legion Bridge as well as a Bi-County Parkway and a new western Potomac River crossing, all of which should be included in the TPB's Unfunded Needs list.

Thank you for your consideration of these recommendations.

Sincerely,

A handwritten signature in black ink, appearing to read 'Nancy H. Smith', written in a cursive style.

Nancy H. Smith
Policy Director



Committee for Dulles

Connected. Involved. Effective.

September 8, 2015

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

Dear Chairman Mendelson:

The Committee for Dulles is a dynamic community of businesses, business leaders, policy makers and dedicated individuals. We represent businesses that have in excess of 10,000 employees. Founded in 1966, the Committee plays a pivotal role in making Dulles International Airport the premier air travel service provider for the national capital region and an economic feeder for the business community that surrounds it. We are the only business focused organization in the United States that supports a major international airport. The Committee for Dulles is dedicated to achieving the full potential of the airport and the economic growth of this region.

The Committee for Dulles considers transportation one of its top priorities and improving our regional transportation network as essential for sustained regional prosperity and security.

The Committee for Dulles urges the National Capital Region Transportation Board to support the inclusion of the following two projects in the 2015 amendment to the region's financially Constrained Long-Range Plan.

VIRGINIA

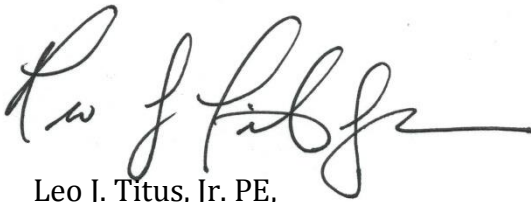
- **I-66 Corridor Improvements Outside the Capital Beltway** – Implement Alternative 2B to reconfigure I-66 between I-495 and Route 15 in Prince William County in both directions to 3 general purpose lanes, a hardened shoulder and 2 managed express lanes for toll, HOV-3 and transit with right of way set aside for future transit extension.
- **I-66 Corridor Improvements Inside the Capital Beltway** – VDOT to upgrade the corridor by:
 - Converting I-66 inside the Beltway to a peak-period managed toll/express lane facility in both directions, increasing HOV-2 to HOV-3 in 2020.

- Using toll revenues to support “multimodal improvements,” including enhanced bus service. We urge that a significant portion of toll revenues should be set aside for widening of I-66 inside the Beltway from the outset of the project.
- Widening I-66 Eastbound by 1 lane between I-495 and Ballston, if needed, by 2040. We urge that new lane construction, in both directions, begin by 2020. The need for additional capacity during rush hour and non-rush hour and weekends now is obvious.

Additionally, for our region to remain economically competitive we must have a regionally focused strategic transportation plan. We recommend that the CLRP be re-evaluated in terms of which highway, bridge and transit investments do the most from a regional perspective to move the most people in the most cost-effective manner, reducing congestion and travel delays and improving regional connectivity.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Leo J. Titus, Jr.", with a long horizontal flourish extending to the right.

Leo J. Titus, Jr. PE,
President



Southern
Environmental
Law Center

530 East Main Street, Suite 620
Richmond, VA 23219
(804) 343-1090
Fax: (804) 343-1093
SouthernEnvironment.org

October 10, 2015

The Hon. Phil Mendelson, Chairman
National Capital Region Transportation Planning Board
777 North Capitol Street, NE
Suite 300
Washington, DC 20002
TPBcomment@mwcog.org

VIA EMAIL

RE: Comments on Draft Amendments to Constrained Long Range Plan

Dear Chairman Mendelson and Members of the Transportation Planning Board:

The Southern Environmental Law Center would like to provide the following comments on the draft 2015 amendments to the Constrained Long Range Plan (CLRP) that are before the Transportation Planning Board. SELC is a non-partisan, non-profit organization that works throughout Virginia to promote transportation and land use decisions that protect our natural resources, strengthen our communities, and improve our quality of life. This includes a focus on providing balanced transportation options, encouraging more sustainable land development patterns, and maintaining and improving existing infrastructure.

Although there are a number of good projects in the draft CLRP, the proposed plan continues to over-emphasize new and expanded roadways. The table of inputs for the 2015 CLRP amendments (and FY2015-2020 TIP air quality conformity) includes 25 pages of highway projects and the CLRP includes approximately 1,200 new lane miles of roadway. A number of these projects would spur sprawling development, encourage greater growth outside of regional activity centers, and increase driving and pollution. It is not too surprising, therefore, that the Performance Analysis of the draft plan shows that a high percentage of population growth will be outside of regional activity centers, that total vehicle miles traveled will increase by 22%, and that the percentage of single occupancy vehicle driving will only dip slightly by 2040. These trends will also make it even more difficult to achieve the Council of Government's goal to reduce greenhouse gas emissions by 80% from the 2005 baseline by 2050. Moreover, the region's equity goals will not be met, as more new jobs are projected to be created on the west side of the region, job access by auto will decrease on the eastern side of the region, and job access by transit will only slightly increase on the eastern side. The draft CLRP should be revised to reduce the amount of new asphalt, better link transportation and land use, and increase transportation equity, and highway proposals like the Bi-County Parkway that would undermine these goals by opening up vast new areas to development should be removed.

As you know, two of the most significant of the proposed additions to the CLRP relate to Interstate 66 – the “Inside the Beltway” multimodal improvement project, and the “Outside the Beltway” corridor improvements. For many years, SELC has advocated improving the vital east-west commute between the most populous areas of northern Virginia and Washington, DC through better transit choices and targeted improvements to the I-66 corridor. However, we have been strongly opposed to proposals that would spur the next wave of suburban sprawl in northern Virginia and facilitate the inefficient development patterns that are already a major cause of traffic congestion on I-66 and other highways in the region. The remainder of our comments will focus on the I-66 proposed additions.

I-66 Inside the Beltway

Given the goals and concerns outlined above, we support including the “Inside the Beltway” proposal in the CLRP, provided that it remains premised on implementing the tolling component of the project first. Further, we strongly endorse using the toll revenues to fund multimodal projects along the corridor, and see this as an essential part of the proposal. We particularly endorse the specific reference made in the project description forms to using toll revenues to fund transit service enhancements that include new priority bus routes on parallel routes like Route 29 and Route 50 (in addition to I-66), as well as Metro station improvements and Metrorail core capacity improvements such as 8-car trains.

Although the potential future highway widening component of the project causes us concern, we agree with the clear position you took in your February 18, 2015 resolution: Tolling and the Group 1 and 2 multimodal projects must be implemented first, and VDOT shall then evaluate and report to TPB the effectiveness of the tolling and multimodal components and assess the continuing necessity of widening before any widening is actually implemented. We urge you to reconfirm that position when you add the project to the CLRP.

I-66 Outside the Beltway

We have serious concerns regarding aspects of the “Outside the Beltway” proposal. Our primary concern is that adding 50 miles of new highway lanes (25 miles in each direction) that extend as far west as Haymarket will fuel and exacerbate the rapid population growth in the western jurisdictions – and the 22% increase in total Vehicles Miles Traveled region-wide – that the Performance Analysis of the draft CLRP predicts by 2040. As noted in the summary of that analysis, even with the CLRP’s addition of 7% more lane miles of roadway throughout the region, “[t]he increase in demand on the roadways is forecast to out-pace the increase in supply, leading to a significant increase in congestion.” Projects that pave the way for development to sprawl farther west along the I-66 corridor will ultimately increase congestion and intensify the region’s transportation challenges.

We have not seen an evaluation of the impact that the various components included in Phase 1 of this project – transit as well as highway widening – would have on important measures of transportation efficacy such as VMT and the number/rates of single-occupancy vehicles (SOV), and we believe it is vital for you to have that information before you vote on whether to include it in the CLRP. If the proposal or any individual components of it would result in, for example, an increase in VMT or SOV over what those would be without the project, that should be an important factor in your deliberations.

Similarly, we have not seen a comparison of the costs and benefits of alternative end points for the proposed tolled lanes. Intuitively, the farther west the project extends, the greater impact it will have on development patterns and the more growth it will induce. A shorter widening component (for example, extending westward to Route 50 or Route 28) might significantly reduce some of those travel-inducing effects (as well as the direct environmental impacts) of the project without a comparable diminishment of any purported benefit in reducing congestion.

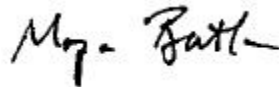
We have urged VDOT and the Federal Highway Administration, and we are now urging you, to instead consider alternatives that focus on upgrades to the overloaded interchanges and merge areas that are a key source of backups along I-66, combined with high-capacity transit enhancements and more efficient land development patterns. We believe these present a more effective long-term solution for the region and would avoid many of the harms resulting from a wholesale highway widening extending out into the Piedmont. At the very least, we ask that you postpone consideration of the project until you have been able to evaluate information comparing the costs and benefits of different Phase 1 termini for the toll lanes, including ending them at the I-66 interchanges at Route 50 or Route 28. Finally, we urge you to make clear that a significant and enforceable financial commitment to transit must be part of any Outside the Beltway proposal included in the CLRP; that commitment remains murky based on the project documentation we have seen to date.

We appreciate your consideration of these comments, and urge you to address these concerns and improve the draft CLRP.

Sincerely,

Handwritten signature of Trip Pollard in black ink.

Trip Pollard
Director, Land and Community Program

Handwritten signature of Morgan Butler in black ink.

Morgan Butler
Senior Attorney