

April 17, 2020

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Virginia Department of Transportation
4975 Alliance Dr., Fairfax, VA 22030

Dear I-495 Express Lanes Northern Expansion Team,

We are writing to express the importance of making public transit the top priority of the I-495 Northern Expansion project. Transit, biking and walking are essential to reducing congestion and traffic-related greenhouse gas emissions, fostering economic growth, providing sustainable travel options for everyone, and fulfilling Fairfax County's Comprehensive Plan and forthcoming Community-Wide Energy and Climate Action Plan (CECAP). While we appreciate inclusion of the parallel bicycle and pedestrian trail and improvements, the lack of transit in the VDOT's I-495 Northern Expansion is shortsighted, ignores the ongoing process to identify transit options via the I-495/American Legion Bridge Transit Study/TDM study¹, and will undermine environmental and economic sustainability of our region.

The purpose and need statement for the project is extremely narrow and disconnected from Fairfax County and State of Virginia plans to reduce greenhouse gas emissions and expand transit options. The project's rationale is overwhelmingly weighted toward one travel mode, private vehicles, and toward a narrow set of metrics measuring Level of Service for vehicles. This approach has repeatedly been proven not to provide long-term congestion relief, is not in harmony with Fairfax County's plans for Tysons, and will increase greenhouse gas emissions.

Simply widening the Beltway for more car trips is not a long-term solution to congestion. The HOT lanes will realize diminishing gains within two decades as the region continues to grow. Furthermore, expanded road capacity leads to increased greenhouse gas emissions, which is at odds with the CECAP goals of reducing emissions. Considering that nearly half of Northern Virginia's greenhouse gas emissions are produced by transportation, it is imperative to include strategies such as bus rapid transit (BRT), rail, and bicycle/pedestrian connections in the region's transportation planning, while coordinating transportation plans with transit-oriented development goals.

The goals laid out for Tysons Urban Center in Fairfax County's Comprehensive Plan indicate that high-capacity transit on the Beltway is essential to the redevelopment of Tysons. More than 30% of all trips during peak periods to and from Tysons will need to be by transit once Tysons is fully built out, according to the Comprehensive Plan. The plan also specifies that achieving this level of transit use will require that Beltway plans provide bus service on dedicated lanes (BRT), and eventually extend rail

¹ Starting at p. 19

<http://www.drpt.virginia.gov/media/2992/pnt-i-66-transit-tdm-plan-update-presentation-final-12-9-19.pdf>

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The Build Alternative described in Section 2.2.2 of the EA would result in a transit enhancement. Express Lanes provide a dedicated running way for buses (which is shared with HOV-3+ vehicles and toll paying vehicles). Buses and HOV-3+ vehicles do not have to pay to use of the facility. Through the use of dynamic tolls, the operator can manage traffic flows to allow buses to travel at higher desired speeds and to provide better travel time reliability for transit trips. With the provision of the dedicated running way, transit operators are able to run transit routes that provide a travel time advantage to potential passengers. This is a condition similar to the operation that may be provided with the implementation of a Bus Rapid Transit facility. The provision of fast and reliable transit service serves as an incentive for drivers to shift to transit rather than use their automobiles.

As indicated in the November 30, 2020 letter from Secretary Valentine to the Chairman of the Fairfax County Board of Supervisors, the Commonwealth of Virginia is committed to provide dedicated, ongoing support for transit services along the corridor as part of the I-495 NEXT project. This commitment ensures that the I-495 NEXT project, together with the existing I495 Express Lanes, provide multimodal solutions to move more people through the corridor.

Under a separate but parallel study that is being coordinated with VDOT, the Virginia Department of Rail and Public Transportation (DRPT) is conducting its I-495 American Legion Bridge Transit and TDM Study in coordination with the Maryland Department of Transportation's Maryland Transit Administration (MTA). The recommendations resulting from this separate study are aimed to work in concert with Virginia's proposed northern extension of the I-495 Express Lanes and Maryland's separately proposed managed lanes program for the American Legion Bridge, I-495, and I-270. More details on this study and recent updates may be found on the project website:

<http://drpt.virginia.gov/transit/major-initiatives/i-495american-legion-bridge-transit-and-tdm-study/>

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service; for example, expansion of the Purple Line from Tysons to Bethesda.² The economic success of Tysons depends on access by multiple transit connections. Lack of transit will limit people's ability to work and shop in Tysons.

The project should include dedicated right-of-way and dedicated funding for transit. Adding transit would help achieve VDOT's own goals for the I-495 expansion, which include providing additional travel choices, and improving travel reliability. Giving people the choice of driving in either regular lanes or HOT lanes excludes those seeking public transit as well as those without cars. A critical piece of the plan for Tysons is to provide housing choices for a variety of income levels, with affordable housing located close to employment opportunities. Many of these residents will rely on transit to connect them to where they need to go. HOT lanes alone do not provide additional travel choices for everyone.

Transportation is the leading contributor to climate change in Virginia. As growing numbers of communities and individuals demand solutions to combat climate change, it is crucial to include sustainable transportation options such as public transit, bicycle/pedestrian connections in all transportation proposals. Climate change, public health, and a vibrant economy are inextricably linked. Reducing greenhouse gas emissions via solutions like public transit benefits all of us.

Sincerely,

Cheri Conca
Conservation Program Coordinator, Northern Virginia
Sierra Club Virginia Chapter

Stewart Schwartz
Executive Director
Coalition for Smarter Growth

Renee Grebe
Northern Virginia Conservation Advocate
Audubon Naturalist Society

² We will be submitting separate comments regarding the American Legion Bridge transit and TDM study and Maryland's 495/270 study seeking analysis of potential rail connections between Tysons and Bethesda (Silver Line and Red Line) as well as engineering for the American Legion Bridge to support heavy rail, as was included in the Woodrow Wilson Bridge.

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Travel benefits to the region include additional interstate capacity, the provision of a facility to enhance transit service, new travel choices, decreased travel time during peak periods, and reduced length of rush hours. For drivers using the American Legion Memorial Bridge (ALMB), this project would add capacity, improve the existing bottleneck, provide new travel choices, reduce congestion on the existing lanes, and improve travel time reliability across the bridge. For drivers using the George Washington Memorial Parkway (GWMP), this project would add capacity, improve the existing bottleneck at the on-ramps for the I-495 interchange, and reduce the weaving needed to access the GWMP from I-495. For drivers using local and neighborhood roads, this project would reduce cut-through traffic by rerouting vehicles to I-495, and reduce delay and congestion at intersections along adjacent local roads.

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The analysis indicates that the implementation of the project would have no adverse impacts to air quality; no violation of the National Ambient Air Quality Standards. The project includes the construction of a shared-use path behind the noise wall between Lewinsville Road and Live Oak Drive.