



April 8, 2013

Stephen Walter  
Parsons Transportation Group  
3926 Pender Drive, Suite 100  
Fairfax, Virginia 22030

Re: I-66 Tier 1 Draft EIS, Comments by the Coalition for Smarter Growth

Dear Mr. Walter:

The Coalition for Smarter Growth, with members and partner groups in Northern Virginia, hereby submits these comments on the Virginia Department of Transportation's Tier 1 Draft Environmental Impact Statement for I-66 ("outside the Beltway").

We agree that addressing transportation in the I-66 corridor should be a top priority. We are pleased that the study considers a range of transit modes and focuses on person-trips. However, we are concerned that this 2040-oriented study fails to offer a long-term, sustainable and effective solution both for 2040 and the decades following. Presuming one of the build alternatives meets the capacity needs for 2040, what happens after 2040? More lanes?

The study appears to favor the managed lane (congestion-priced, high occupancy toll lane scenario), but does that scenario really offer the long term demand reduction and capacity that a high-capacity transit with transit-oriented land use would offer?

Documentation is far too limited for why this study favors managed lanes and there is no analysis of the comparative effects on land use of each of the modes.

The most significant shortcoming is the failure to evaluate an integrated land use and transit scenario that would offer a way to more effectively reduce the growth in driving demand and provide the capacity to handle the demand that does come. We have made this comment repeatedly with VDOT studies, yet never do VDOT studies include such a scenario.

The land use discussion is particularly thin and at too high a level (see 4.1.1.1). As was found in the Tysons study, mixing uses, providing a local grid of streets, and measuring the results using more compact traffic analysis zones can show remarkable SOV trip reductions and transit mode share increases -- networking these centers with Tysons could provide synergistic vehicle demand reduction benefits, while improving reliable access to jobs.

The study should evaluate an alternative land use scenario linking transit-oriented development (compact, walkable, mixed-use communities linked to transit), with land conservation of rural areas, and high

capacity transit, in order to maximize transit trips, minimize vehicle trips, and to provide the means to handle future growth. The study explicitly states that it has excluded a systems oriented transit scenario, but a systems oriented transit and TOD scenario is exactly what's needed and should be combined with TDM measures and targeted bottleneck and safety improvements in a composite scenario.

Table ES-1 shows that a transit approach matched with TDM and addressing chokepoints would rank highest in meeting the needs identified in the Purpose in Need, yet the study did not provide an integrated scenario linking transit, TDM and addressing chokepoints.

Since the Council of Governments adopted Region Forward Plan and Compact is framed as a transit-oriented future for the region, this study should have studied such a regional scenario. Once again a too narrow corridor focus improperly exclude the networked transit and TOD solution.

The Purpose and Need Statement fails to include what should be key goals for the corridor. While the stated purpose " is to improve multimodal mobility along the I-66 corridor by providing diverse travel choices in a cost-effective manner, and to enhance transportation safety and travel reliability for the public along the I-66 corridor," it should also include goals to reduce demand for single occupant vehicle trips (including vehicle miles traveled and vehicle trips), by increasing mode share for non-auto trips through transit and changes in land use -- changes in both the location of future development and improved community design which would result in higher transit ridership. Again, looking to the long term, the stated goals cannot be met unless demand reduction goals are also a core goal and focus of this study.

In addition Purpose and Needs states, "the identified needs to be addressed include: transportation capacity deficiencies, major points of congestion, limited travel mode choices, safety deficiencies, and lack of transportation predictability," orients the study too much toward capacity expansion and fails to include as key needs, such as reducing driving demand and improving land use to reduce driving demand and increase non-auto mode share.

The study is also artificially separated from the analysis of I-66 inside the Beltway even though a substantial proportion of inbound trips travels inside the Beltway and will have impacts all the way into D.C..

The study also inappropriately and without explanation excludes a dedicated transit and HOV scenario, leaving expanded HOV scenarios completely out of the study.

While the practice is to include all projects in the CLRP in the No Build scenario, inclusion of the controversial Route 234 extension (TriCounty Parkway western alignment) which would open up rural areas to more development and increase traffic would likely make the No Build perform worse than it would otherwise.

By separating a full tolling analysis from this study, it's not possible to get a full picture of the effects of HOT lanes on transit usage, carpooling, general purpose lanes and parallel roadways. A full toll effects analysis should not be deferred to a separate study. Moreover the relative benefits of privately tolled should be compared to public tolling, including the ability to use public tolling to fund more transit service in the corridor.

We were very concerned by the way Tiering of the I-81 study, which also failed to study a composite solution recommended by our group, was used to later foreclose the offering of a composite alternative at Tier 2. In addition, by tying the Tiering with the concept of "projects of independent utility," a too general and flawed Tier 1 study can then open the door to allowing VDOT to move forward with

whichever project it wishes and to foreclose more effective system wide alternatives. Here, the issue may involve specific segments, but equally likely it would allow VDOT to move forward with just one component of the Integrated Concept Scenarios -- such as tolled, managed lanes. In fact, the discussion of the ICS, very clearly proposes to allow VDOT to move forward with just one component. Read with other chapters of this study, it appears that the study is framed to favor the tolled, managed lanes.

The study cites the 1999 MIS in a history of previous studies but fails to note the stated preference of elected officials at that time (at least Fairfax County and probably others) for a transit-first solution.

We are also concerned that the Memorandum of Understanding, which we do not believe was subject to public comment, is also structured to focus on and favor a tolled, managed lane scenario, rather than another potentially non-tolled scenario. The study states that per the MOA, decisions on the following will be made upon completion of the Tier 1 study:

- The concepts to be advanced for the I-66 corridor, including transit improvements, transportation demand management strategies, and/or roadway improvements. Within these concepts, consideration will be given to managed lanes and tolling;
- The general location for studying future highway and transit improvements in Tier 2 NEPA document(s);
- Identification of projects with independent utility to be evaluated in Tier 2 NEPA document(s) and evaluated pursuant to other environmental laws; and
- Advancing tolling for subsequent study in Tier 2 NEPA document(s).

With points one and four focused on tolling, and the potential intention to use the "projects of independent utility" to advance only the tolled portion of an ICS, the study appears to improperly lean toward one approach over others -- the tolled, managed lanes.

The entry and exit tables are confusing because it's not clear from the use of eastern, middle and western tables where the greatest demand may lie nor what the primary origin and destination data might be.

The COG growth projections which are used by this study fail to account for the dramatic changes in demographics, market demand and energy prices, nor a future of higher energy prices. In turn, having had one of the largest expansions of the federal government in recent history shifting to a very likely downsizing, especially in defense, means that the growth projections should be reevaluated. This can mean substantially less growth in outer areas. In turn, it's important to note that the allocation of growth within the region is a subjective exercise and that high growth assigned to outer areas is not inevitable, nor is the form of that growth.

In addition, use of percentages for growth can be misleading and tables should be provided to show the magnitude of growth. In addition, the report may overstate Gainesville/Haymarket growth while understating Tysons Corner growth.

While VDOT might argue that it is not responsible for land use, when billions of dollars are at stake, a thorough analysis of cost-effective alternatives must look at alternative growth scenarios. And simply because an agency is not responsible for a subject area like land use, doesn't mean it shouldn't be studied in an EIS as a potential piece of an alternative. VDOT itself has published a report on the benefits of "Transportation Efficient Land Use" yet inappropriately eliminates such demand management solutions from this corridor.

Again in chapter 3 (figure 3-1), the process for evaluating solutions is flawed by ruling out TDM and system/out of corridor solutions early in the process.

The four step evaluation approach (3-2) is also flawed for failing to look at alternative growth scenarios and changes in land use combined with other TDM approaches, meaning that the total travel demand entered in the first step may be higher than it would otherwise be.

We don't understand and are concerned by the statement on 3-6 that "Demand is also based on unconstrained capacity on I-66 itself (although connecting roads were constrained) in order to ascertain total demand." That would seem to inflate the travel demand and overly favor capacity expansion solutions.

It doesn't appear that the study factors in the congestion feedback signal from congestion in the general purpose lanes which would lead to higher transit use or new residents and jobs moving to transit-accessible locations as has been happening in recent years.

It's not clear from Table 3-1 if the transit ridership numbers are based on transit-efficient land use or a continued pattern of auto dependent development in Prince William and western Fairfax, where transit efficient development might result in higher transit ridership. It's also not clear whether the managed lane scenario counts transit trips in the lanes -- trips that could also be achieved by HOV/transit lanes without tolls.

Again, Table 3-3 shows that combining transit with a chokepoints solution could meet more components of the Purpose and Need than the managed lanes.

Table 3-4 lacks adequate supporting documentation and is a virtual "black-box" to the public. The ICS alternatives fail to include non-tolled HOV with transit in any of the alternatives, which biases the study to managed toll lanes. It does not appear that the transit ridership factors in congestion feedback from the general purpose lanes.

It is unclear how Table 3-4 and Table ES-2 footprint widths are calculated.

The "Key Findings" (3-9) don't appear to be fully substantiated. For example, it states:

- "Other than the two-lane Managed Lanes concept (ML2) which accommodates autos and buses alike, single mode improvement concepts result in large corridor width, high cost, poor efficiency, and/or inability to serve total demand." Would that indeed be true of Metrorail or an HOV/BRT approach, with each tied to transit-efficient land use?
- Another stated finding is that: "The share of trips made either by transit or in multi-occupant vehicles for those ICSs that perform best against the Table 3-4 metrics reach over 80 percent. While accommodating such high percentages of trips by transit and multi-occupant vehicles would be very difficult, the fact that these percentages are so high is indicative of the benefit of including transit and managed lanes that can carry large numbers of person-trips as part of the solution." If that is the case, why not use an HOV and transit solution rather than only use tolled, managed lanes with the various transit modes?
- Another stated finding is that "The projected peak period travel demands in the corridor highlight the need for a transportation solution that provides space efficiency – the ability to carry large numbers of persons within limited spaces. Managed Lanes and fixed-guideway transit (in descending order of carrying capacity: Metrorail Extension, Bus Rapid Transit, and Light Rail Transit) provide space efficiency. But do managed lanes really provide space efficiency when the interchange needs of having dual sets of ramps are factored in? The

interchanges on the 495 HOT lanes have taken a substantial number of acres with a profound impact on surrounding communities.

Conclusion: It is critical to get this Tier I study right because completion of this study will likely foreclose consideration of alternatives at the Tier 2 stage. The study appears biased toward the managed lane approach by failing to analyze non-toll HOV with transit alternatives and by failing to analyze a composite transit, transit-efficient land use, TDM and chokepoint alternative (a systems oriented approach and one that would meet the regional goals in Region Forward). The study does not substantiate the footprint, ridership, table 3-4 ratios, and costs; and the "findings" are also unsubstantiated. Effects on land use are not addressed.

- We request the opportunity for additional time for peer review of this study by independent transportation planners.
- We also request that VDOT's report on Transportation Efficient Development be considered in this study along with the goals of Region Forward.
- Finally we request that this study be delayed until the composite alternative that we highlight is analyzed using alternative growth and land use.

Thank you.

Stewart Schwartz  
Executive Director