



COALITION FOR  
SMARTER GROWTH



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

February 10, 2012

National Capital Region Transportation Planning Board  
Metropolitan Washington Council of Governments  
777 North Capitol Street NE, Suite 300  
Washington, DC 20002-4239  
[TPBPublicComment@mwkog.org](mailto:TPBPublicComment@mwkog.org)

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

Dear Members of the Transportation Planning Board:

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

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

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

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

### **Impact to Historic Resources:**

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

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

### **Availability of A Less Damaging, Reasonable Alternative:**

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

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

This comprehensive approach avoids or minimizes the harm to the Battlefield and the Historic District that the MBB and TCP would inflict while also providing alternatives for the traffic that

currently uses Route 29 or Route 234 through the Battlefield. It also focuses scarce resources on the dominant movement of east-west commuter traffic and allows for local traffic movement and accessibility.

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

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

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

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

### **Future, Foreseeable Threats Pose Even Greater Risk to Battlefield:**

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

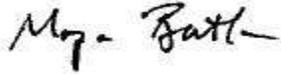
In closing, we respectfully urge you:

- Not to include the Manassas National Battlefield Park Bypass in the CLRP;
- To remove the Tri-County Parkway from the CLRP;
- Include instead in the CLRP and the air quality conformity modeling the package of alternatives outlined above; and
- If you do decide to add the MBB to the CLRP, to ensure that the MBB is clearly defined and mapped in the CLRP as including the closure of Route 29 and Route 234 through the Battlefield, and that the air quality conformity modeling is coded to show the roads as closed.

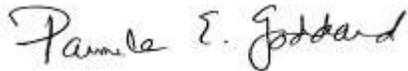
Sincerely,

A handwritten signature in black ink, appearing to read "Stewart Schwartz". The signature is fluid and cursive.

Stewart Schwartz, Executive Director, Coalition for Smarter Growth

A handwritten signature in black ink, appearing to read "Morgan W. Butler". The signature is cursive and somewhat stylized.

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

A handwritten signature in black ink, appearing to read "Pamela E. Goddard". The signature is cursive and clearly legible.

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

A handwritten signature in black ink, appearing to read "Chris Miller". The signature is cursive and somewhat stylized.

Chris Miller, President, Piedmont Environmental Council