

**Coalition for Smarter Growth, Piedmont Environmental Council,
Southern Environmental Law Center**

March 16, 2011

Commonwealth Transportation Board
c/o Office of the Secretary of Transportation
Patrick Henry Building, 3rd Floor
1111 East Broad Street
Richmond, VA 23219

Dear Secretary Connaughton and members of the Commonwealth Transportation Board:

We are writing concerning a resolution that we understand will be introduced at your meeting today proposing to add a new north-south corridor in Northern Virginia (North-South Corridor) as a Corridor of Statewide Significance (“CoSS”). Among other things, we are concerned that such designation would likely be used to advance the wasteful and controversial Tri-County Parkway and related connections that offer little transportation benefit for their exorbitant costs. Moreover, extensive analysis has failed to identify a critical need for the proposed corridor, and designating the North-South Corridor as a CoSS would divert scarce resources from the more pressing transportation corridor in this area – as well as from more pressing corridors in other parts of the Commonwealth. We urge you to reject the proposal to add this new Corridor of Statewide Significance, and not to take any actions that could result in north-south highway projects in this corridor becoming a priority for funding in the upcoming Six-Year Plan update.

The Proposed CoSS Designation Would Promote Wasteful and Costly Highway Proposals

The Commonwealth has an enormous list of critical transportation needs. A new highway in the North-South Corridor is not one of them. It is not surprising that the Tri-County Parkway and related projects were not mentioned by the Administration throughout the recent debate on the Governor’s \$4 billion transportation funding proposal. The many more pressing transportation needs facing the Commonwealth include \$3.7 billion in structurally deficient bridges, \$1 billion in deficient pavement, transit maintenance and operating shortfalls, and bottlenecks on existing transportation corridors. With resources so scarce we must choose our priorities wisely.

Designating the North-South Corridor as a CoSS would likely advance ineffective north-south highway proposals such as the Tri-County Parkway and related proposals that have been shown to offer little

benefit for their extremely high price. Here are some of the reasons why no further actions should be taken by the CTB that could advance those north-south highway projects:

- 1) The most accurate measurements of existing traffic congestion were recently released by INRIX and showed that the DC region's worst areas of congestion were on I-66, I-95 and the Beltway.ⁱ The CTB's own Corridors of Statewide Significance study of the Northern Virginia Corridor shows that the failing highways now and in 2035 are, and will be, the radial corridors including the east-west corridors of I-66, Route 50 and Route 29. This report does not show north-south congestion problems on Route 28.ⁱⁱ
- 2) East-west travel, not north-south travel, in Loudoun and Prince William Counties, represents the overwhelming preponderance of the traffic volumes and is the issue in need of priority attention. Smart Mobility, Inc., a national transportation modeling consultant, has analyzed the draft Environmental Impact Statement for the Tri-County Parkway and for the proposed Manassas National Battlefield Park Bypass,ⁱⁱⁱ as well as the Loudoun County Transportation Plan. All three analyses confirm these east-west traffic flows.
- 3) The CTB's Corridors of Statewide Significance report for the Northern Virginia Corridor between Winchester and Washington DC does not substantiate a need for a new highway corridor. In addition to mapping the predominant east-west traffic problem, it shows that air freight shipped through Dulles Airport represents just .1 percent by weight and .2 percent by value of all freight moving in the northern Virginia corridor.^{iv} The narrative also acknowledges that investments in Route 28, including new interchanges, has improved access to Dulles Airport.^v
- 4) Proponents of the new corridor have cited the need for access to Dulles Airport from the west, but the main entrance to the airport for passengers who use Dulles Airport is on the east side. A new highway in a western corridor would be about four to five miles longer for a trip from Innovation Research Park to the Dulles Airport entrance than one using I-66 and Route 28. As for enhancing freight access, the comparative freight levels are minimal compared to other freight movements (see 3 above).^{vi}

The proposed highway is listed in the state's VTrans 2035 Surface Transportation Report as costing \$474,756,000 for the approximately ten mile corridor from I-66 to Route 50.^{vii} Part of the reason for this high price tag is likely the extensive mitigation that would be required to provide any reasonable level of buffering for the Manassas National Battlefield Park from noise and visual pollution. The proposal first mentioned at your February meeting also included expansion of Route 606 (part of the so-called Dulles Loop) and Route 50 or other connections, ten additional miles of highway which would increase costs. For example, the current estimate for an interim upgrade of Route 606 to a continuous 4-lane divided roadway is \$52,650,000,^{viii} but this excludes the full cost of the proposed 8-lane freeway and at least four interchanges, two of which would be major interchanges. At a cost of \$80 million per major interchange and \$40 million for a smaller interchange,^{ix} Route 606 alone could cost another \$280-\$300 million to

construct. Thus, the total price tag for the Tri-County western alignment and Route 606 (not counting the Route 50 expansion) could be as much as \$775 million. Certainly there are more cost-effective economic development strategies for Prince William County.

- 5) For current and future traffic, the Smart Mobility consultants have recommended a set of solutions that include focusing on I-66 and Route 50 east-west traffic, Virginia Railway Express upgrades, express bus service, and providing roundabouts and safety upgrades for local roads. These local upgrades would meet traffic needs without fueling significant new residential development in the Prince William Rural Crescent and Loudoun County Transition Zone. These are the types of projects that should be the focus of planning efforts in this area, rather than new north-south highways.
- 6) This year, Virginia will join the nation in honoring the 150th Anniversary of the Civil War, including the 150th Anniversary of the First Battle of Manassas.^x Next year will be the 150th anniversary of the Second Battle of Manassas. Yet, this highway would destroy the historic landscape on the western boundary of Manassas Battlefield. It would impact an area of some of the worst fighting in the Second Battle – at Brawner Farm; areas of troop movement to both battles; an historic district adjacent to the battlefield; and Stuart’s Hill – land that cost the taxpayers \$134 million to protect from a proposed mall.^{xi}

Access to Dulles Airport is covered in a decade’s worth of VTrans analysis and was not identified as a critical priority

Proponents of the North-South Corridor have mentioned benefits that would accrue from improving access to Dulles Airport from the west. However, such access has not been identified as a critical priority in the CoSS planning processes that have occurred to date. Further, the additional study likely to be part of the new CoSS designation would potentially cost in the hundreds of thousands of dollars, if not over one million dollars. This expenditure of taxpayer dollars to advance a priority of questionable need cannot be justified.

The VTrans statewide transportation planning process, including Corridors of Statewide Significance, involved nearly a decade of study at a probable cost of millions of dollars. The process began with legislation passed in 2000. The CTB completed VTrans 2025 in 2004 and VTrans 2035 in January 2010. VDOT completed its Surface Transportation Plan in 2010. Yet these planning processes and underlying analyses did not make access to the west side of Dulles a top priority.

Nor was the North-South Corridor identified during the specific process of identifying the existing 11 Corridors of Statewide Significance. As set forth in the VTrans 2035 documents, that process was thorough and involved participants and technical advisors from a wide array of regional and statewide perspectives representing all modes of transportation. Although access to Dulles Airport from the west was mentioned in the analysis of the Northern Virginia Connector CoSS^{xii} (see page 37 of VTrans 2035, and the CoSS report), such access to the airport was NOT described as a very significant problem, and strong justification for this western connection is not offered.

The expert technical advisors developed the Corridors of Statewide Significance with full knowledge of demographic projections and socioeconomic and travel demand forecasts. (See page 13 of the VTrans report, explaining that such forecasts “were used to guide the analysis of Corridors of Statewide Significance.”)^{xiii} In full consideration of these forecasts, the various VTrans reports did not elevate western access to Dulles Airport as a critical priority. Designating a CoSS now to help provide that access would therefore ignore the CoSS priorities that emerged from the extensive analysis that VDOT, DRPT, other agencies, consultants and the CTB have undertaken.

Further, the proposed North-South Corridor fails to meet some of the key criteria that must be satisfied to qualify as a CoSS. According to the VTrans 2035 Report approved by the Commonwealth Transportation Board:

“The CoSS concept was first introduced in VTrans2025 as the Multimodal Investment Network (MIN). The purpose of the MINs was to focus on multimodal solutions to move people and goods within and through Virginia. The criteria for being designated a MIN included:

- The corridor must have multiple modes or be an extended freight corridor;
- The corridor connects regions, states, and/or major activity centers;
- The corridor provides for a high volume of travel; and
- The corridor provides a unique statewide function and/or addresses statewide goals.

Technical advisors representing rail, transit, highway, aviation, port, MPO, and PDC interests developed and applied the criteria that yielded 11 MINs. Although their names have changed, these remain the Commonwealth’s significant corridors, as represented in Exhibit 12.”^{xiv}

The proposed North-South Corridor fails to meet key criteria that would qualify it as a CoSS.

- In particular, it does not provide for a high volume of travel. As we have substantiated, the main travel volumes are east-west. Route 28 has already been expanded to handle future north-south traffic in this area.
- The western alignment would create a highway that will initially go through rural areas and some new suburban areas that are unlikely to generate significant demand for transit, so it is unlikely to be a truly multimodal corridor.
- The VTrans report shows that air freight is just .1 percent by weight and .2 percent by value of shipments in the existing Northern Virginia Connector CoSS so the proposed new North-South Corridor seems unlikely to qualify as a critical extended freight corridor
- It does not appear to have a “unique statewide function.”

Thus, a decade worth of analysis at a probable cost of millions of dollars did not identify access to Dulles

Airport as a critical problem and did not identify western access via a north-south highway as a Corridor of Statewide Significance. Further, the proposed North-South Corridor fails to meet the criteria necessary to qualify as a CoSS.

For all of these reasons, we urge you to reject addition of this corridor to the Corridors of Statewide Significance and not to take any actions that could advance north-south highway projects in this area or prioritize their funding in the upcoming Six-Year Plan update.

Thank you.

Sincerely,



Stewart Schwartz
Coalition for Smarter Growth

Chris Miller
Piedmont Environmental Council

Trip Pollard
Southern Environmental Law Center

SOURCES:

ⁱ INRIX Traffic Scorecard, <http://www.inrix.com/scorecard/>

ⁱⁱ Corridors of Statewide Significance – Northern Virginia, http://www.vtrans.org/resources/Northern_Virginia_Connector_I-66.pdf, see pages 22-25.

ⁱⁱⁱ Smart Mobility, Inc., Review of the Battlefield Bypass and Tri-County Parkway Environmental Impact Statements (2 reports included), <http://www.smartergrowth.net/anx/ass/library/11/smartmobility.pdf>

^{iv} Corridors of Statewide Significance – Northern Virginia, http://www.vtrans.org/resources/Northern_Virginia_Connector_I-66.pdf, see page 13.

^v Corridors of Statewide Significance – Northern Virginia, http://www.vtrans.org/resources/Northern_Virginia_Connector_I-66.pdf, see page 34.

^{vi} Corridors of Statewide Significance – Northern Virginia,
http://www.vtrans.org/resources/Northern_Virginia_Connector_I-66.pdf, see pages 13.

^{vii} Surface Transportation Plan – Northern Virginia --
http://www.viriniadot.org/Projects/vtransNew/resources/VSTP_%20by_Chapter/Chapter%206%20by%20Region/Chap6_2Northern.pdf, see page 121.

^{viii} Dulles Loop Implementation Group, Dulles Loop Implementation Plan, May 15, 2009.

^{ix} Interchange Cost Estimates, Gorove/Slade Presentation to Senator Herring’s Loudoun Route 7 committee, page 10.

^x Virginia Sesquicentennial Commemoration of the Civil War, <http://www.viriniacivilwar.org/>

^{xi} \$134 million to protect Stuart’s Hill, <http://www.landscapeonline.com/research/article.php?id=7360>

^{xii} VTRANS 2035 Report, http://vtrans.org/resources/VTrans_2035_Report.pdf, page 37

^{xiii} VTRANS 2035 Report, http://vtrans.org/resources/VTrans_2035_Report.pdf, page 13

^{xiv} VTRANS 2035 Report, http://vtrans.org/resources/VTrans_2035_Report.pdf, page 27.