

**SOUTHERN ENVIRONMENTAL LAW CENTER · COALITION FOR SMARTER GROWTH
PIEDMONT ENVIRONMENTAL COUNCIL · NATIONAL PARKS CONSERVATION ASSOCIATION
ARLINGTON COALITION FOR SENSIBLE TRANSPORTATION · AUDUBON NATURALIST SOCIETY
FAIRFAX ALLIANCE FOR BETTER BICYCLING · PRINCE WILLIAM CONSERVATION ALLIANCE
SIERRA CLUB VIRGINIA CHAPTER**

July 22, 2017

Northern Virginia Transportation Authority
3040 Williams Drive, Suite 200
Fairfax, VA 22031
TransActionUpdate@NVTATransAction.org

VIA EMAIL

Re: Joint Comments on Draft TransAction Plan and Project List

Thank you for the opportunity to provide written comments on the draft TransAction Plan and Project List (jointly referred to herein as the “draft Plan” unless otherwise specified). These comments are being jointly submitted by the Southern Environmental Law Center, Coalition for Smarter Growth, Piedmont Environmental Council, National Parks Conservation Association, Arlington Coalition for Sensible Transportation, Audubon Naturalist Society, Fairfax Alliance for Better Bicycling, Prince William Conservation Alliance, and Sierra Club Virginia Chapter. Please note that they supplement testimony that individual representatives of these organizations have offered on their organizations’ behalf at the recent open houses on the draft Plan.

As the long-range transportation “master plan” for Northern Virginia and an important screening tool used in the development of the NVTAs Six Year Program, the TransAction Plan offers an invaluable opportunity to steer a rapidly growing region toward a much more sustainable transportation future. However, in order to continue the progress the region has made in this direction—for example, with the Silver Line and transit-oriented development—the Plan must focus the region’s transportation investments on multi-modal strategies and projects that leverage our existing assets and expand transportation choices, rather than perpetuating the asphalt-dominated approach of the past that has fueled the sprawling development patterns that are a primary cause of Northern Virginia’s notorious traffic congestion.

As will be discussed further below, the draft Plan does evince an intent to advance a more sustainable and effective transportation approach for Northern Virginia, building upon the recent strides the region has been making. However, it includes too many projects that would take the region in the opposite direction, and it should focus much more on supporting centers than corridors. Further, its value is undermined by the lack of data and analysis that would enable decision-makers and the public to differentiate between those projects on the draft Project List that would help build a sustainable transportation future and those that would not.

The Draft Plan Includes Aspects of a Sustainable Transportation Approach

There is a clear nod in the draft Plan toward a multi-modal transportation approach that supports and encourages smarter growth. For example, its vision statement (which was originally adopted by the Transportation Coordinating Council in 1999 and has been an important guide for the region ever since) emphasizes the importance of making investments that promote areas of concentrated growth, and of joining multiple modes in an interconnected and fiscally sustainable network.

Moreover, numerous projects included in the draft Project List would clearly advance this vision by increasing transportation options and facilitating transitions between modes, and by supporting development patterns that reduce driving and congestion. Such projects include improved access to rail stations on the Manassas VRE line, new bus and pedestrian connections to Loudoun's Sliver Line stations, and pedestrian and bike improvements in Falls Church and Fairfax City. These are the types of projects that typically offer the best "bang for the buck," align with ongoing changes in demographic preferences, and have a significant economic impact. They would also deliver a tremendous benefit to the region by serving as the first- and last-mile connections to transit, thereby enabling a greater shift of travel from single-occupancy vehicles to other modes and relieving the burden on congested highways. We strongly support including them in the draft Project List.

Outer Beltway Projects and New Potomac Crossings Should Be Removed

Unfortunately, the draft Project List includes a number of wasteful projects that would increase driving and exacerbate suburban sprawl, while inflicting irreversible damage on important natural, historic, and cultural resources. It contains far too many highway and arterial road expansions and costly interchanges which do not account for induced demand and which will fail if current development patterns continue.

Of particular concern, several projects would form segments of an incredibly expensive and destructive Outer Beltway that would open up new areas in Loudoun and Prince William Counties (and in Maryland, as well) to scattered, sprawling development patterns while offering only limited transportation benefits. These proposals include:

- An Outer Potomac River Crossing linking Route 28 in Virginia with I-270 in Maryland (project #24);
- Bi-County Parkway (project # 226, labeled "VA 234 Bypass North");
- Manassas Battlefield Bypass (project #254);
- Constructing Northstar Boulevard from Shreveport Drive to US 50 (project #119);
and
- Widening/constructing Northstar Boulevard between Belmont Ridge Road and Braddock Road (project #187).

In addition to the Outer Potomac crossing listed above, the draft Project list includes another problematic proposal for a new Potomac bridge: the East Potomac River Crossing linking I-95 in Virginia to US 301 in Maryland (project #87). Both the “Outer” and “East” Potomac crossings would generate sprawl and undermine key regional transportation goals, while diverting financial resources away from real solutions to the region’s transportation needs. In particular, any effort to construct a new crossing will almost certainly dilute the regional emphasis needed on fixing or replacing the American Legion Bridge and the Rosslyn Tunnel—two existing Potomac crossings that are essential to the region’s vitality and should be the highest priority links across the river.

Traffic modeling done during the development of the draft Plan points to the dubious value of the two Potomac crossing proposals. Specifically, an April 2017 presentation by NVT A staff to the NVT A’s Technical Advisory Committee summarized the results of a comparison of a Year 2040 scenario that included the two new proposed bridges to a scenario that did not. According to the presentation, the bridge scenario offered only “modest” reductions in person hours of travel, hours of delay, and transit crowding relative to the scenario that did not include the bridges (reductions of 1.7%, 4.2%, and 1.4%, respectively). Similarly, the bridge scenario produced only a “slight” mitigation of residual problem areas such as I-495.¹ “Mega-proposals” like these two crossings should offer more than “modest” or “slight” benefits in order to be included in the draft Project List.

Further, recent data from the National Capital Region Transportation Planning Board² show that very few commuting trips in the D.C. Metropolitan region and the outer suburbs are the “U-shaped” trips that might use a new Outer Potomac crossing (*i.e.*, between Loudoun County or western Fairfax County in Virginia, and Frederick County or northern Montgomery County in Maryland). Rather, the vast majority of commuting trips are made by people who live and work within the same jurisdiction or who are commuting radially.

For example, the number of commuting trips that both start and end in Fairfax County is 361,000, and the number of trips from Fairfax to Washington, D.C. is 106,000. In stark contrast, the number of trips commuting from Fairfax to Montgomery County is only 16,000, and a significant portion of those are likely traveling to locations along, inside, or reasonably near the Beltway (and therefore are more conveniently served by the American Legion Bridge). Notably, these numbers are consistent with the findings of origin-destination studies VDOT conducted in 2003-04 and in 2015.

Similarly, commuting trips that both originate and conclude in Montgomery County total 333,000, and 111,000 trips start in Montgomery and end in D.C. By comparison, the number of commuting trips starting in Montgomery and ending in Fairfax, Loudoun, and Prince William Counties, however, is only 21,000, 2,000, and 1,000, respectively. Further, a substantial number

¹ See Technical Advisory Committee, April 19, 2017, “Transaction Baseline Analysis,” Bridge Sensitivity Analysis. Archived at <http://www.thenovaauthority.org/about/committees/document-archives/tac-document-archives/> (slide #46 in presentation included in “Documents” for April 19, 2017 meeting date).

² See NC RTPB Long-Range Plan Task Force, May 17, 2017, “Key Drivers of Future Transportation System Performance Challenges; Land Use and Commuting Patterns.” Available at <https://www.mwcog.org/file.aspx?&A=Y7Qzp1lppHBk0R%2b9HMclQfDUF%2f8Snv22r%2f3AG1Ukcf0%3d> (slides 22-24).

of the 21,000 trips ending in Fairfax are likely destined for Tysons Corner, and other sizable portions are likely headed to Merrifield and Fairview Park, and, to a lesser extent, Reston (again, most locations are served directly by the American Legion Bridge).

Given that these two Potomac crossing projects and the connecting highways they would necessitate are likely to cost in the billions of dollars, divert resources from projects that would improve the commutes people are actually making, and primarily serve the new traffic they would induce, it is a mistake to include them in the TransAction Project List. We urge you to remove them, as well as the projects listed above that would form segments of an Outer Beltway.

The Plan Should Focus More on Supporting Centers and Less on Corridors

The TransAction plan should focus more on supporting centers than corridors because mixed-use, walkable, and transit-accessible development in focused centers offers long-lasting benefits in terms of reduced vehicle miles traveled and greater mode shifts to walking, bicycling, and transit. The draft Plan's emphasis on long-distance corridor travel needs to be reduced; instead it should develop packages of projects that support transit-oriented centers, including local street grids, transit circulators and connectors, and bicycle/pedestrian and complete streets investments. The fact that the average commute trip length today is 14.67 miles, and the average non-commute trip is 6.25 miles, is stunning confirmation that we need to better link housing, jobs, and transit, and improve local accessibility to daily needs (with resulting reductions in vehicle miles traveled and greenhouse gas emissions).

The Plan Should Include Better Data to Help Select and Prioritize Projects

We realize that TransAction is a fiscally unconstrained plan, but we are concerned that it is over-inclusive and lacks the type of analysis needed to prioritize among the more than 350 projects it contains. More specifically, the draft Plan's approach of grouping projects into 28 different corridor segments and then ranking those different segments based on the degree to which the draft Plan would improve them provides little insight into the value of individual projects or even particular groups of projects. In other words, while a segment may have received a high "performance rating," there is no information indicating which individual projects have the greatest benefit and are primarily responsible for achieving that rating. Further, with no information about the cost of various projects provided, there is no way to determine their relative cost-effectiveness. As a result, the ranking of the corridor segments by their performance ratings on page 10 of the Draft Plan offers little value to decision-makers and the public in determining which individual projects deserve to be considered for inclusion in the Six Year Program.

In summary, the draft TransAction Plan includes some positive aspects that can help advance the type of transportation system needed to achieve the regional vision set forth in the document. However, a much greater shift should be made away from proposals for destructive new highways and river crossings that will create new transportation problems by inducing traffic and causing more sprawl. We urge you to remove from the Plan the counter-productive projects described above, shift much more of the focus to projects that support mixed-use,

walkable and transit-oriented centers, and include in the final Plan more analysis of the benefits and costs of individual projects (or groups of projects) to produce a more valuable planning tool.

Thank you for your consideration of our comments.

Sincerely,

Morgan Butler
Senior Attorney
Southern Environmental Law Center

Stewart Schwartz
Executive Director
Coalition for Smarter Growth

Christopher Miller
President
Piedmont Environmental Council

Pamela Goddard
Director of Chesapeake and Virginia Programs
National Parks Conservation Association

John Sutherland
President
Arlington Coalition for Sensible Transportation

Monica Billger
Virginia Conservation Advocate
Audubon Naturalist Society

Jeff Anderson
President
Fairfax Alliance for Better Bicycling

Charles A. Grymes
Chair
Prince William Conservation Alliance

Kelsey Crane
Conservation Program Coordination
Sierra Club Virginia Chapter