

I-66 Corridor Coalition

May 18, 2015

The Honorable Aubrey L. Layne, Jr.  
Secretary of Transportation  
Patrick Henry Building  
1111 East Broad Street, Third Floor  
Richmond, Virginia 23218

Dear Secretary Layne:

We are writing to you following the recent release of the draft Environmental Assessment on I-66 Outside the Beltway. The I-66 Corridor Coalition agrees that addressing the I-66 corridor is a top priority for the region and for the entire Commonwealth. However, we are deeply concerned that the proposed plans to widen I-66 outside the Beltway will degrade our streams, increase air pollution and global warming emissions, will not meet the transportation demands of the future, and will not serve the economic needs of Northern Virginia.

The Coalition continues to urge for a more comprehensive analysis of the I-66 corridor that evaluates a full range of alternatives, and that I-66 be treated as part of a broader approach that addresses transportation, transit-oriented development, and neighborhood and environmental issues.

We appreciate VDOT and the Department of Rail and Public Transportation's commitment to integrating transit, pedestrian and bicycle facilities into the proposed project, but are concerned that the commitments do not go far enough to truly relieve congestion in the I-66 corridor. The planning process for evaluating and identifying alternatives has been fundamentally flawed, resulting in a proposed project that will have significant impacts on the homes and lives of people living along the I-66 corridor while failing to address induced traffic and the underlying causes of congestion. This is an outdated and expensive short-term solution that will limit responsible and cost-effective land-use and transit planning in this corridor for decades. Both the Tier 1 and the draft Tier 2 environmental studies have failed to analyze a transit-first alternative and land use scenarios that would maximize walking, bicycling, and transit, while reducing extra long-distance auto commutes.

Our major concerns with the proposed project are as follows:

- Lack of coordination with land use planning: Congestion on I-66 is a result of poor land use decisions that have made driving alone the only viable option for most residents outside the Beltway. The Commonwealth's draft long-range transportation plan, VTRANS2040, emphasizes the need to better coordinate transportation and land use, and this emphasis needs to be applied to this project. The managed lanes are likely to fuel continued auto-dependent development far from the core of the region, and induce new traffic demand over the long term. In addition, motorists will likely take advantage of the new lanes to shift trips to peak hours or take more single-occupancy trips.
- Low transit projections in the Environmental Assessment: The projected number of transit trips is low because of the failure to measure the benefits of land use changes and because the new highway capacity could undermine transit demand. Long-term congestion relief requires compact, walkable mixed-use development tied to good transit and protection of rural land in Prince William County, and strong transit-oriented development in the commercial areas of Fairfax County. While the new proposed transit routes and park and ride lots will improve transit service, transit will be much more effective in attracting riders and relieving pressure on I-66 if it is linked to these land use changes.
- Stormwater management and stream restoration: The addition of impervious surface and construction impacts will significantly add pollution and runoff and further degrade the health of our streams. These impacts will only partially be offset by the proposed stormwater management improvements, because VDOT is reportedly seeking exemption from current stormwater regulations for the existing roadbed.

VDOT is presenting a false choice between stormwater management and preserving homes and community green spaces. Instead, VDOT should either find an alternate approach that minimizes the construction footprint while meeting the current stormwater management requirements, or reevaluate the proposed managed lanes project.

- Bicycle and pedestrian facilities: We appreciate the incorporation of bicycle and pedestrian facilities in I-66 crossings. However, the proposed plans lack specific details about parallel bicycle facilities and connectivity to transit stations along the corridor. Studies by the Washington Metropolitan Area Transit Authority show that investments in bicycle and pedestrian accessibility to transit stations can significantly increase transit ridership and at a capital cost that is orders of magnitude less than building costly parking structures.

The Coalition will support Virginia's efforts to implement long-term solutions to transportation requirements in the I-66 corridor by working with local, county, state, federal, and non-profit entities to incorporate high-capacity transit, improved biking and walking connections, and land use scenarios for more compact, mixed-use communities linked to transit and the preservation of existing contiguous neighborhoods. This approach addresses traffic congestion while maximizing value to taxpayers and reducing disruption of communities and our environment.

Thank you for your consideration of our views.

Sincerely,

Stewart Schwartz, Executive Director, Coalition for Smarter Growth  
Sonya Breehey, Fairfax Advocates for Better Bicycling  
Kris Unger, Primary Conservator, Friends of Accotink Creek  
Christine Elrod and Cristina Lewandoski, Co-Presidents, Herndon Environmental Network  
Tania Hossain, President, Providence District Council  
Stuart M. Whitaker, Founder, Transitters  
Douglas Stewart, Transportation Chair, Virginia Sierra Club