



495 Express Lanes Northern Extension Comments

Via VDOT online comments form

November 8, 2020

The Friends of Accotink Creek endorse the joint letter submitted by the Audubon Naturalist Society, Coalition for Smarter Growth, and Sierra Club Great Falls group, below.

We further wish to add our concerns that whatever form this or other projects may take, it must fulfill our collective obligations to future generations to maintain principles of:

- Enhanced fish & wildlife passage
- Advanced stormwater controls
- Habitat preservation where clearing can be avoided
- Use of native-only plantings
- Maximum habitat restoration post-project

Friends of Accotink Creek

><(((°>`·,.,.~`·,.,><(((°> "Find just one other person who cares." ><(((°>`·,.,.~`·,.,><(((°>`·,.,.~`·,.,. ><(((°>

**Sierra Club Great Falls Group * Coalition for Smarter Growth
Audubon Naturalist Society**

September 30, 2020

Abi Lerner, PE Associate Manager of Special Project Development
Susan Shaw, Director of Megaprojects
Virginia Department of Transportation
4975 Alliance Dr., Fairfax, VA 22030

Dear I-495 Express Lanes Northern Extension Team,

The proposed “Build” Alternative for I-495 from Old Dominion Drive to the George Washington Memorial Parkway will not provide long-term congestion relief, misses the opportunity to provide residents and commuters with more travel choices, and will significantly increase greenhouse gas emissions. **We urge Virginia to re-examine the assumptions behind this project and conduct a more robust alternatives analysis before moving forward.**

Transit, biking and walking are essential to reducing congestion and traffic-related greenhouse gas emissions, fostering economic growth, providing sustainable travel options for everyone, and fulfilling Fairfax County’s Comprehensive Plan and forthcoming Community-Wide Energy and Climate Action Plan (CECAP). While we appreciate inclusion of the parallel bicycle and pedestrian trail, the lack of transit in VDOT’s I-495 Northern Extension is shortsighted, ignores the ongoing process to identify transit options through the I-495/American Legion Bridge Transit Study/TDM study¹, and will undermine environmental and economic sustainability of our region.

The purpose and need statement for the project is extremely narrow and disconnected from Fairfax County’s and Virginia’s plans to reduce greenhouse gas emissions and expand transit options. The project’s rationale is overwhelmingly weighted toward one travel mode, private vehicles, and toward a narrow set of metrics measuring Level of Service for vehicles. By providing only one “Build” Alternative, the environmental assessment is taking a patently conclusions-first approach. This is not in harmony with Fairfax County’s plans for Tysons, and will increase greenhouse gas emissions.²

¹ “I-495/American Legion Bridge Transit/TDM Study,” Virginia Dept. of Rail and Public Transportation presentation to Commonwealth Transportation Board, 12/10/19. Starting at p. 19,

<http://www.drpt.virginia.gov/media/2992/ppt-i-66-transit-tdm-plan-update-presentation-final-12-9-19.pdf>

² The qualitative greenhouse gas emissions impact analysis in the Air Quality technical report of the Environmental Assessment lacks a clear methodological basis and is contradicted by numerous peer-reviewed studies of induced demand from highway capacity expansions. Todd Litman, *Generated Traffic: Implications for Transport Planning* (July 2020), cites the wide body of evidence demonstrating the direct link between highway capacity expansion and increases in Vehicle Miles Traveled.

In addition, the modeling assumptions used to justify the “Build” Alternative must be reexamined in light of the long-term impacts of the COVID-19 pandemic. A study commissioned by the Northern Virginia Transportation Authority on changes in travel behavior due to COVID-19 indicated there will be a long-term increase in telecommuting of 10-15%.³ It would be imprudent to give away public right-of-way for 50-75 years to a private concessionaire based on traffic assumptions that clearly need to be revisited.

Simply widening the Beltway for more car trips is not a long-term solution to congestion. The HOT lanes will realize diminishing gains within two decades as the region continues to grow. Furthermore, expanded road capacity leads to increased greenhouse gas emissions, which is at odds with Fairfax County’s CECAP goals of reducing emissions. Numerous peer-reviewed studies have demonstrated that additional lane miles on highways, including HOT lanes, translate into increased vehicle miles traveled.⁴ Considering that nearly half of Northern Virginia’s greenhouse gas emissions are produced by transportation, it is imperative to include strategies such as bus rapid transit (BRT), rail, and bicycle/pedestrian connections in the region’s transportation planning, while coordinating transportation plans with transit-oriented development goals.

The goals laid out for Tysons Urban Center in Fairfax County’s Comprehensive Plan indicate that high-capacity transit on the Beltway is essential to the redevelopment of Tysons. More than 30% of all trips during peak periods to and from Tysons will need to be by transit once Tysons is fully built out, according to the Comprehensive Plan⁵. The plan also specifies that achieving this level of transit use will require that Beltway plans provide bus service on dedicated lanes (BRT), and eventually extend rail service; for example, extension of the Purple Line from Tysons to Bethesda. The economic success of Tysons depends on access by multiple transit connections. Lack of transit will limit people’s ability to work and shop in Tysons. As we consider the long-term sustainability of this growing region, public transportation must be the first option considered when expanding transportation capacity.

The project should include dedicated right-of-way allowing for a future rail line connecting Tysons to Bethesda and the Purple Line, and dedicated funding for transit. Adding transit would help achieve VDOT’s own goals for the I-495 extension, which include providing additional travel choices and improving travel reliability. Doing so also supports Fairfax County’s One Fairfax Policy by giving those without cars an option for efficient transportation. A critical piece of the plan for Tysons is to provide housing choices for a variety of income levels, with affordable housing located close to employment opportunities. Many of these residents will rely

³ “ COVID-19: Transportation Impacts and Opportunities,” AECOM presentation to NVTVA, July 9 2020, https://thenovaauthority.org/wp-content/uploads/2020/07/5.NVTVA_R2S-Scenario-Planning_Draft-Presentation_7-8-20_v3.pdf

⁴ These studies are cited in Litman, op. cit., p. 7, and in the National Center for Sustainable Transportation Induced Travel Calculator, <https://blinktag.com/induced-travel-calculator/about.html>

⁵ See “Public Transportation Goals,” ppg. 42-43, at https://www.fairfaxcounty.gov/tysons/sites/tysons/files/assets/documents/pdf/comprehensive_plan/fc_comp_pl_an2017ed_tysons_amended04_04_2017.pdf

on transit to connect them to where they need to go. HOT lanes alone do not provide additional travel choices for everyone.

In conclusion, we believe Virginia should not commit to this project given the uncertainties about the effectiveness of the “Build” Alternative in providing long-term congestion relief, the need to evaluate a wider range of alternatives, and the failure of the project to include transit. We urge that VDOT and the Commonwealth Transportation Board re-evaluate the proposal for this segment of I-495.

Sincerely,
Norbert Pink
Chair
Sierra Club Great Falls Group

Sonya Breehey
Northern Virginia Advocacy Manager
Coalition for Smarter Growth

Renee Grebe
Northern Virginia Conservation Advocate
Audubon Naturalist Society

Cc: Supervisor John Foust
Delegate Kathleen Murphy
Senator David Marsden
Senator Barbara Favola
Senator Janet Howell
Senator Jennifer Boysko
Delegate Richard (Rip) Sullivan
Delegate Eileen Filler-Corn
Delegate Vivian Watts
Delegate Marcus Simon
Chairman Jeff McKay
Hon. Mary Hynes, Commonwealth Transportation Board