

I-66 Corridor Coalition

Virginia Sierra Club * Friends of Accotink Creek * Fairfax Alliance for Better Bicycling *
Providence District Council * [Transiters](#) * Coalition for Smarter Growth * Herndon
Environmental Network

September 29, 2015

Hon. Sharon Bulova, Chairman
Fairfax County Board of Supervisors
12000 Government Center Parkway
Fairfax, VA 22035-0079

Dear Chairman Bulova:

We are writing to request a meeting to discuss the I-66 Outside the Beltway Preferred Alternative. The I-66 Corridor Coalition is an alliance of environmental, transit, bicycle, smart growth and community groups that supports a comprehensive approach to addressing transportation, environmental and community priorities in the I-66 corridor. The enclosed May letter to Secretary Layne encapsulates our main priorities and concerns regarding the project.

The I-66 Outside the Beltway project provides an opportunity to add high-capacity transit around more walkable, mixed-use communities, improve bicycle and pedestrian connections, and upgrade stormwater management while minimizing disruption to Fairfax communities. However, we continue to have questions and concerns that the project misses critical opportunities that would benefit Fairfax County, and is not in synch with Fairfax County's emphasis on transit-oriented development, expanded transportation options and environmental sustainability. Our concerns center on four issues: transit, bicycling and pedestrian connections, stormwater management, and community impacts.

Transit

Fairfax has many emerging compact, mixed-use, walkable communities in and near the I-66 corridor, including Dunn Loring, Tysons, Fair Oaks, Centreville and the Route 28 corridor. Fairfax County's 10-year Transit Development Plan contains several recommendations for improved transit in the I-66 corridor, such as new routes between Orange and Silver Line Metro stations and compact nodes such as Fair Lakes and Centreville.

The I-66 project provides an opportunity to improve transit services in these areas and support more focused growth, which will expand transportation choices and relieve congestion. We appreciate that Fairfax County has provided input on the transit plans and requested consideration of additional services recommended in the 10-year Transit Development Plan. Our concerns are that the current transit plan for I-66 lacks details about how transit will be funded, and it is overly focused on long-distance commutes from large park and ride lots. While it's important to capture new transit riders from lower-density areas, the plan should also focus on serving more compact, walkable areas such as the nodes mentioned above. We believe projected ridership from the overall transit plan would be higher if this focus were incorporated.

Funding for transit capital and operating expenses should be embedded in the preferred alternative, and should be a binding component of any public-private partnership agreements. Just as important, the funded transit should include transit enhancements in and near the I-66 corridor, not just on the HOT lanes themselves. For example, transit improvements on Route 28 and on Route 123 would have a direct impact on relieving the congestion on those roads, which in turn will relieve congestion on I-66. By the same token, transit and street design improvements on Gallows Road could increase the person through-put capacity in this part of the corridor without necessitating the taking of additional right-of-way. We also believe that the project should set specific benchmarks for transit mode share on I-66, track the fulfillment of these benchmarks and make future phasing contingent on meeting these benchmarks.

Bicycle and pedestrian facilities

We are pleased that the Preferred Alternative includes a parallel shared-use path, along with improved biking and walking infrastructure on all rebuilt crossings. We would like to thank the Board of Supervisors for their support of bicycle and pedestrian infrastructure, particularly the parallel trail, as part of the I-66 project, and FCDOT for working closely with VDOT to make it happen.

The parallel trail is a crucial active transportation element of a multimodal strategy in the corridor and provides solid steps in support of both the Fairfax County Bicycle Master Plan and the Countywide Trails Plan.

A shared-use path along I-66 outside the Beltway will provide direct access for biking and walking from neighborhoods to current and future public transit and park and ride lots; suburban centers like Merrifield, Fairfax Corner and Fair Oaks; and employment centers throughout Northern Virginia.

We urge VDOT to continue pursuing design scenarios that ensure a safe consistent trail for the entire length of the project. Providing a direct trail route within the I-66 corridor, upgraded facilities if adjacent streets are used, safe crossings at major interchanges, and good connections across the interstate will ensure a successful active transportation network as part of the I-66 multimodal solutions.

Stormwater management

We fear this project is headed in the direction of overlooking the environmental, ethical, and legal realities that compel current stormwater regulations. The result will be to force mitigation and remediation costs onto the taxpayers in local jurisdictions.

The project crosses a number of watersheds of already-impaired streams demanding our protection, including the headwaters of Accotink Creek, currently the subject of a TMDL process. A choice between preserving private properties and protecting our streams is a false choice. A transit-first approach would maximize the use of existing impervious surface and pose a more viable stormwater solution.

Whatever project emerges, we urge incorporation of:

- Stormwater management for the entire roadbed, meeting modern stormwater management standards, not just added impervious surface. There should be no “grandfathering” of stormwater standards.
- Stormwater controls above and beyond the legally required minimums, in anticipation of predicted climate changes, including precipitation occurring as shorter more intense storms.
- A widened concept of the corridor to find opportunities for enhanced stormwater controls outside the right of way, such as installing nearby green roofs and pervious parking lots.
- Use of pervious pavement for the planned bicycle path, shoulders, and wherever else feasible.
- Oversight and enforcement of erosion and sediment controls during and following construction adequate to keeping sediment out of our waterways.
- Mitigation for wetlands disturbed within the affected watershed, not at a remote artificial wetlands bank.
- Collaboration with Fairfax County to incorporate elements of county watershed management plans into stormwater controls and stream crossings.
- Stormwater detention ponds designed with wetland pools to fully retain and treat at least the first 1-inch of runoff.
- Outfalls incorporating step-pool systems terminating in wetlands pools to counter erosive energy.
- No net loss of natural areas/wooded areas inside or outside the right of way. Losses should be mitigated by equal nearby replanting.
- No use of invasive species in seed mix or plantings during and after construction. We have in mind especially fescue grasses and Chinese lespedeza (lespedeza cuneata, lespedeza sericea).

Community Impacts

We continue to be concerned about community impacts in the Dunn Loring / Stenwood community. The widening of Gallows Road from 4 to 6 lanes around the Stenwood community will create detrimental impacts on Stenwood Elementary School. All of VDOT’s proposed alternatives include the taking of 0.7 acres of land running adjacent to I-66 that include the current privacy treeline, portions of the ball fields, and a portion of the school track. This tract of land was improved with a \$12,000 capital investment by the Stenwood PTA and paid for with funds by parents, family, and community members. The entire field is protected under Section 4(f) of the US Department of Transportation Act of 1966, but VDOT considers this a relatively small size of school property and not subject to protection. However, taking this land would mean the loss of playing fields for activities such as soccer not only for the students of Stenwood ES but for community use as well. The entire field must be protected under Section 4(f) of the US Department of Transportation Act of 1966.

We continue to be concerned about the impact on safety, security, and wellness of the students of Stenwood. The reduction of the school’s outdoor field size also poses a risk to managing crowds

in emergency evacuation procedures. The track and fields are an integral part of the school day and for community events that encourage physical exercise and wellness. This further reduction of the school's land and construction during the 5 - 6 year duration of project time and in the aftermath will further limit the quality of educational activities such as outdoor gym classes and playtime, track and field, and the 5K community walk/run sponsored by the Stenwood PTA.

We appreciate VDOT's efforts to work with homeowners in Dunn Loring, Vienna, and Oakton toward a zero impact on their homes. However, there needs to be great due diligence to address inevitable road construction issues such as mitigating sound walls, changes in traffic patterns, impact on local businesses, environmental impacts, along with the welfare and wellness of all those who live in this corridor.

We would like to request a meeting by October 15 in order to discuss these concerns and priorities in more detail. We appreciate Fairfax County's vigorous participation in the I-66 planning process but believe that significant improvements are needed to make the I-66 project truly multimodal and to minimize its impacts on our communities and the environment.

Sincerely yours,

Douglas Stewart, Transportation Chair, Virginia Sierra Club

Sonya Breehey, Fairfax Alliance for Better Bicycling

Kris Unger, Primary Conservator, Friends of Accotink Creek

Tania Hossain, President, Providence District Council

Stewart Schwartz, Executive Director, Coalition for Smarter Growth

Stuart M. Whitaker, Founder, Transitters

Christine Elrod and Cristina Lewandoski, Co-Presidents, Herndon Environmental Network

Cc: Tom Biesiadny

Robert Kuhns

Enc. May 18 letter to Sec. Layne regarding I-66 draft Environmental Assessment