

**Approved by the Fairfax County Federation of Citizens Associations  
Board as its 28 May 2015 meeting:**

**Testimony provided on 3 June 2015 at the I-66 Public Hearings  
on Tier 2 Draft Environmental Assessment**

**In addition to the Highway Improvements, Mass Transit Needs To Be Part Of Any  
Proposed I-66 Solution**

The State Legislature has established that one of the leading criteria for prioritizing VDoT projects is that the project reduces congestion. Widening I-66 outside the beltway without including a mass transit option will not make a significant long-term difference in the congestion problems of the corridor

Clearly, the extension of the Orange line has the greatest long-term capacity impact as recognized by the allowance made for future expansion of mass transit in the proposed project. Extending the Orange line is not a realistic prospect at this time, so soon after the Silver line expansion. Furthermore, extending the Orange line at this time would not yield the traffic congestion relief that it could due to the choke point at the Rosslyn tunnel. WMATA Momentum plans do not include resolution of Rosslyn tunnel choke point problem for at least the next decade.

Although building light rail from Haymarket to the Vienna Metro station would provide somewhat better congestion relief at a much lower price than extending the Orange line, light rail does nothing to alleviate the Rosslyn tunnel choke point.

We prefer the implementation of a true bus rapid transit (BRT) system in the interim. A bus rapid transit option would allow buses to use the HOV lanes inside the beltway and significantly increase the capacity of the corridor. The project should be designed with the future extension of the rail in mind. BRT stations should be built in the middle of I-66 with pedestrian bridges and escalators similar to the Orange and Silver lines. Buses should have scheduled headways and timetables providing reliable service throughout the day, including mid-day and pre- and post-rush hour service so that commuters and casual users know that they can leave their vehicles at park and ride facilities and not be left stranded by limited service hours. Once the Rosslyn tunnel choke point is resolved, mass transit could be extended by converting the BRT stations to rail along the BRT right-of-way.

**Bicycle/Pedestrian uses must be considered along the corridor**

We support the addition of a protected bicycle/pedestrian pathway in the Fairfax County portion of the improvement. Although one solution indicates intermittent segments of a

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bicycle/pedestrian pathway along the corridor, where the pathway cannot be accommodated, the pathway is shown routed through county streets. Having an intermittent bicycle/pedestrian pathway defeats the purpose of its use. By routing bicyclists onto the county's streets, we are in a no better position than we are now, with bicycle traffic encountering cross and paralleling vehicular traffic. The rationale for the separate bicycle/pedestrian pathway is its safety by separating the vehicular from non-vehicular traffic. Pathways such we are describing have already been implemented on I-66 inside the Beltway, see for instance the Custis and "Washington and Old Dominion" Trails.

**Separated HOV/HOT Lanes Are An Important Part Of The Solution**

The present HOV lanes along I-66 do not work. The HOV lanes are slowed:

- by the constant vehicular flow between the HOV and non-HOV lanes,
- by the use of the lanes by vehicles not qualifying as HOV,
- by the impracticality of enforcing the HOV restrictions, and
- by not having ramps between the HOV lanes and the Vienna Orange line station.

The proposed solution shows separated HOV lanes that would also accommodate tolled users that did not qualify as HOVs. We support this concept, though if tolling is implemented, funds collected should be used to reduce congestion along the corridor, including mass transit, and not be used for improvements indiscriminately throughout Northern Virginia.

**The Project Should Retain All Stormwater From I-66**

In an effort to minimize the use of eminent domain , VDOT has pursued having the project only provide stormwater retention for the new impervious surface. That would be acceptable had the original lanes been designed to the current retention standards and the affected waterways were meeting water quality goals. But the previous I-66 construction was **not** designed to current stormwater standards, and the impacted waterways **are** highly impaired. The streams are so heavily impacted that the Federal EPA has already proposed requiring reductions in stormwater volume controls to reduce sediment loads for Accotink Creek, one of the impacted streams.

To minimize the need for property takings we propose that the project be encouraged to identify off-site retention options such as adding rain gardens to existing parking lots in the corridor.

**Climate Change Needs to Be Considered**

Consideration of climate change should not be limited to simply calculating the additional greenhouse gas emissions caused by the project, but must also consider the climate change impacts on the project for instance:

- Climate models predict more intense rainfall events so additional stormwater retention is required.

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- Climate models also predict higher temperatures, so the road surfaces need to consider the increased temperatures, and the air pollution hot spot analysis should consider the higher temperatures in their analysis as well.

The impacts of the additional greenhouse gas emissions should also be considered. Climate change will have devastating impacts on coral reefs, so the additional greenhouse gas emissions will have an indirect impact on the endangered coral species and this too needs to be considered.

**The Route 28/I-66 Interchange Is The Most Important Single Intersection Along The Highway And Must Provide All Turning Movements**

State Route 28 provides limited-access connectivity to and from Washington Dulles International Airport from points south and west of the airport. Its current interchange with I-66 does not provide full interconnectivity, currently forcing eastbound I-66 traffic which wants to go south on RT 28 to use RT 29 through a commercial corridor, as does the reverse flow of northbound Rt 28 traffic which wants to go west on I-66. The interchange should be planned to provide all turning movements, even if this means litigation to take the necessary property from E.C. Lawrence Park.