

# I-495 Express Lanes Northern Extension Revised Environmental Assessment

May 2021





U.S. DEPARTMENT OF TRANSPORTATION  
FEDERAL HIGHWAY ADMINISTRATION  
and  
VIRGINIA DEPARTMENT OF TRANSPORTATION

## **REVISED ENVIRONMENTAL ASSESSMENT**

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### **I-495 Express Lanes Northern Extension**

Fairfax County, Virginia

State Project No.: 0495-029-419, P101; UPC 113414

Federal Project No.: NHPP-495-5(095)

From: North of Exit 43 George Washington Memorial Parkway

To: Exit 45 Dulles Toll Road (Route 267)

Submitted Pursuant to 42 U.S.C. 4332(2)(C)

May 2021

## TABLE OF CONTENTS

<b>Chapter 1.0</b>	<b>Purpose and Need .....</b>	<b>1-1</b>
1.1	Project Limits.....	1-1
1.2	Study Area.....	1-2
1.3	Project History .....	1-5
1.3.1	Other Projects in the Vicinity.....	1-9
1.4	Needs for the Project.....	1-11
1.4.1	Reduce Congestion.....	1-11
1.4.2	Provide Additional Travel Choices.....	1-16
1.4.3	Improve Travel Reliability.....	1-17
1.5	Project Purpose.....	1-22
<b>Chapter 2.0</b>	<b>Alternatives .....</b>	<b>2-1</b>
2.1	Alternative Development.....	2-1
2.2	Alternatives Under Consideration.....	2-1
2.2.1	No Build Alternative .....	2-1
2.2.2	Build Alternative .....	2-2
2.3	Ability of Alternatives to Meet Purpose and Need.....	2-8
2.3.1	Ability of the No Build Alternative to Address the Purpose and Need.....	2-8
2.3.2	Ability of the Build Alternative to Address the Purpose and Need.....	2-8
<b>Chapter 3.0</b>	<b>Existing Conditions and Environmental Consequences .....</b>	<b>3-1</b>
3.1	Introduction and Overview of Environmental Issues.....	3-1
3.1.1	Study Area.....	3-1
3.1.2	Limits of Disturbance .....	3-1
3.2	Communities and Community Facilities .....	3-13
3.2.1	Existing Conditions.....	3-13
3.2.2	Environmental Consequences .....	3-16
3.3	Population and Housing.....	3-28
3.3.1	Existing Conditions.....	3-28
3.3.2	Environmental Consequences .....	3-28
3.4	Economic Resources .....	3-28
3.4.1	Existing Conditions.....	3-28
3.4.2	Environmental Consequences .....	3-29
3.5	Land Use .....	3-30
3.5.1	Existing Conditions.....	3-30

3.5.2 Environmental Consequences .....3-32

3.6 Environmental Justice.....3-34

3.6.1 Existing Conditions.....3-34

3.6.2 Environmental Consequences .....3-35

3.7 Historic Properties.....3-35

3.7.1 Archaeological Resources .....3-36

3.7.2 Architectural Resources.....3-36

3.7.3 Coordination Efforts Between VDOT, NPS and the SHPO.....3-40

3.7.4 Section 106.....3-42

3.7.5 Environmental Consequences .....3-43

3.8 Section 4(f).....3-44

3.8.1 Existing Conditions.....3-45

3.8.2 Environmental Consequences .....3-48

3.8.3 Trails and Bike Facilities within the Study Area.....3-49

3.9 Section 6(f).....3-49

3.9.1 Existing Conditions.....3-50

3.9.2 Environmental Consequences .....3-50

3.10 Air Quality.....3-53

3.10.1 Existing Conditions.....3-53

3.10.2 Environmental Consequences .....3-54

3.11 Noise .....3-60

3.11.1 Existing Conditions.....3-64

3.11.2 Environmental Consequences .....3-64

3.12 Waters of the U.S.....3-66

3.12.1 Existing Conditions.....3-66

3.12.2 Environmental Consequences .....3-69

3.13 Water Quality.....3-70

3.13.1 Existing Conditions.....3-71

3.13.2 Environmental Consequences .....3-73

3.14 Floodplains.....3-73

3.14.1 Existing Conditions.....3-73

3.14.2 Environmental Consequences .....3-75

3.15 Wildlife and Habitat.....3-76

3.15.1 Existing Conditions.....3-76

3.15.2 Environmental Consequences .....3-80



3.16 Threatened, Endangered, and Special Status Species .....3-81

    3.16.1 Existing Conditions.....3-82

    3.16.2 Environmental Consequences .....3-84

3.17 Hazardous Materials.....3-87

    3.17.1 Existing Conditions.....3-87

    3.17.2 Environmental Consequences .....3-87

3.18 Indirect and Cumulative Effects .....3-89

    3.18.1 Indirect Effects.....3-89

    3.18.2 Cumulative Effects.....3-94

**Chapter 4.0 Coordination and Comments ..... 4-1**

4.1 Agency Coordination..... 4-1

    4.1.1 Federal/Regional..... 4-1

    4.1.2 State..... 4-1

    4.1.3 Local Government..... 4-2

    4.1.4 Other..... 4-2

4.2 Agency Scoping Responses ..... 4-2

4.3 Stakeholder Technical Advisory Group..... 4-9

4.4 Section 106 Consultation..... 4-9

4.5 Public Involvement .....4-10

    4.5.1 Public Information Meetings.....4-11

    4.5.2 Distribution of the EA, Technical Reports, and Design Public Hearing Plans .....4-12

    4.5.3 Virtual Question-and-Answer Session on I-495 NEXT Project.....4-14

    4.5.4 Joint DRPT/VDOT Virtual Public Information Meeting on I-495 American Legion Bridge Transit Study.....4-15

    4.5.5 Location and Design Public Hearing.....4-15

    4.5.6 Additional Coordination and Public Involvement Efforts.....4-15

**Chapter 5.0 References ..... 1**

**Chapter 6.0 Acronyms ..... 1**

**APPENDICES**

- Appendix A: Section 4(f) and 6(f) Technical Memorandum  
*(Visualization Booklet Attachment to Section 4(f) & 6(f) Technical Memorandum is Included as a Separate Volume)*
- Appendix B: Agency Scoping Correspondence
- Appendix C: Summary of Comments Received Prior to Distribution of EA
- Appendix D: Agency Correspondence Following EA Distribution and Public Hearing
- Appendix E: Local Officials and Local Organizations Correspondence Following EA Distribution and Public Hearing
- Appendix F: Public Hearing Summary, Transcripts, and Responses to Public Comments Received Following Public Hearing
- Appendix G: Small Group and Agency Coordination Meetings

**EXHIBITS**

- Exhibit 2-1a. Build Alternative Ultimate Configuration Concept Design (Sheet 1 of 5 .....2-18
- Exhibit 2-1b. Build Alternative Ultimate Configuration Concept Design (Sheet 2 of 5) .....2-19
- Exhibit 2-1c. Build Alternative Ultimate Configuration Concept Design (Sheet 3 of 5) .....2-20
- Exhibit 2-1d. Build Alternative Ultimate Configuration Concept Design (Sheet 4 of 5) .....2-21
- Exhibit 2-1e. Build Alternative Ultimate Configuration Concept Design (Sheet 5 of 5) .....2-22

**FIGURES**

- Figure 1-1. I-495 Express Lanes Northern Extension Project Vicinity ..... 1-3
- Figure 1-2. I-495 Express Lanes Northern Extension Project Limits ..... 1-4
- Figure 1-3. Current I-495 Lane Segments ..... 1-7
- Figure 1-4. Average Weekday Hourly Volumes along I-495 Northbound .....1-12
- Figure 1-5. Average Weekday Hourly Volumes along I-495 Southbound .....1-12
- Figure 1-6. I-495 Northbound Average Daily Traffic: 2018 vs. 2045 No-Build (Forecast).....1-13
- Figure 1-7. I-495 Southbound Average Daily Traffic: 2018 vs. 2045 No-Build (Forecast).....1-14
- Figure 1-8. Average Weekday Travel Times, I-495 Northbound GP Lanes Through Study Area.....1-18
- Figure 1-9. Average Weekday Travel Times, I-495 Northbound Express Lanes Through Study Area.1-19
- Figure 1-10. Average Weekday Travel Times, I-495 Southbound GP Lanes Through Study Area.....1-20
- Figure 1-11. Average Weekday Travel Times, I-495 Southbound Express Lanes Through Study Area1-21
- Figure 2-1. Existing Flexible Post Delineators on I-495 Express Lanes..... 2-3
- Figure 2-2. Existing and Build Alternative Typical Sections..... 2-4

Figure 2-3. Proposed Shared Use Path Location..... 2-7

Figure 2-4: 2045 No Build and Build – AM Peak Period Average Speeds, I-495 GP Lanes.....2-11

Figure 2-5: 2045 No Build and Build – PM Peak Period Average Speeds, I-495 GP Lanes.....2-12

Figure 2-6. 2045 No Build and Build – AM Peak Period Person Throughput, I-495 Northbound.....2-13

Figure 2-7. 2045 No Build and Build – AM Peak Period Person Throughput, I-495 Southbound.....2-14

Figure 2-8. 2045 No Build and Build – PM Peak Period Person Throughput, I-495 Northbound.....2-15

Figure 2-9. 2045 No Build and Build – PM Peak Period Person Throughput, I-495 Southbound<sup>3</sup> .....2-15

Figure 2-10: I-495 Northbound GP Travel Times Observed between July 2017 and June 2018 from Route 123 to ALMB.....2-17

Figure 2-11: I-495 Northbound Express Lanes Projected Future Travel Times in 2045 from Westpark Drive to AMLB.....2-17

Figure 3-1. I-495 Express Lanes Northern Extension Project Limits ..... 3-3

Figure 3-2. Community Facilities within the Study Area.....3-14

Figure 3-3. Recreational Trails and Bicycle Facilities within the Study Area.....3-15

Figure 3-4. Existing view facing southeast from Falstaff Road near Lear Road.....3-17

Figure 3-5. Visualization of Build Alternative facing southeast from Falstaff Road near Lear Road...3-17

Figure 3-6. Existing view facing southeast from Snow Meadow Lane.....3-18

Figure 3-7. Visualization of Build Alternative facing southeast from Snow Meadow Lane .....3-18

Figure 3-8. Existing view facing north along Live Oak Drive .....3-20

Figure 3-9. Visualization of Build Alternative facing north along Live Oak Drive.....3-20

Figure 3-10. Existing view facing south along Live Oak Drive.....3-21

Figure 3-11. Visualization of Build Alternative facing south along Live Oak Drive.....3-21

Figure 3-12. Existing view facing west from Butternut Court.....3-22

Figure 3-13. Visualization of Build Alternative facing west from Butternut Court.....3-22

Figure 3-14. Existing view facing north from Butternut Court.....3-23

Figure 3-15. Visualization of Build Alternative facing north from Butternut Court.....3-23

Figure 3-16. Existing view facing north from Lawton Street.....3-24

Figure 3-17. Visualization of Build Alternative facing north from Lawton Street.....3-24

Figure 3-18. Existing view facing north from Lawton Street.....3-25

Figure 3-19. Visualization of Build Alternative facing north from Lawton Street.....3-25

Figure 3-20. 2017 McLean Planning District Map.....3-31



Figure 3-21. National Register of Historic Places-Listed Resources in the APE .....	3-39
Figure 3-22. Section 4(f) and 6(f) Resources in the Study Area.....	3-47
Figure 3-23. Section 6(f) Impacts Related to the Scott’s Run Nature Preserve .....	3-52
Figure 3-24. MSAT Affected Network shown on 2025 Build Network.....	3-57
Figure 3-25. Noise Receivers in the Study Area.....	3-63
Figure 3-26. Streams and Wetland Features – Route 267 to Old Dominion Drive.....	3-67
Figure 3-27. Streams and Wetland Features – Old Dominion Drive to Potomac River .....	3-68
Figure 3-28. Impaired Waters .....	3-72
Figure 3-29. 100-Year Floodplains .....	3-74
Figure 3-30. Available Wildlife Habitat.....	3-78
Figure 3-31. Potential Habitat for Threatened and Endangered Species within the Study Area .....	3-86
Figure 3-32. Hazardous Materials Sites .....	3-88
Figure 3-33. Indirect and Cumulative Effects Report Study Areas .....	3-90

## TABLES

Table 2-1. No Build Projects within the I-495 Study Corridor.....	2-2
Table 2-2. 2045 Forecasted Daily Traffic Volumes Along I-495.....	2-9
Table 3-1. Summary of Existing Conditions and Environmental Consequences .....	3-4
Table 3-2. Land Use Conversion Under the Build Alternative.....	3-33
Table 3-3. Surveyed Resources Within the Architectural APE that are Recommended Potentially Eligible, Eligible for, or Listed on the National Register of Historic Places.....	3-37
Table 3-4. Identified Potential Section 4(f) Properties Within the Study Area.....	3-48
Table 3-5. Impacted Section 4(f) Properties Within the LOD.....	3-49
Table 3-6. Annual MSAT Emissions by Year, Scenario and Pollutant on the Affected Network.....	3-57
Table 3-7. Summary of Proposed Noise Barrier Details .....	3-65
Table 3-8. Summary of In-Kind Noise Barrier Extension Details.....	3-65
Table 3-9. Streams and Wetlands in Study Area and Estimated Impacts of the Build Alternative.....	3-69
Table 3-10. 100-Year Floodplains in Study Area and Estimated Impacts of the Build Alternative.....	3-75
Table 3-11. Available Wildlife Habitat in Study Area and Estimated Impacts of the Build Alternative.....	3-80
Table 3-12. Threatened and Endangered Species Occurrences in Study Area.....	3-82
Table 3-13. Estimated Threatened and Endangered Species Potential Impacts Within LOD.....	3-85

Table 4-1. Agency Scoping Responses..... 4-2

Table 4-2. NPS and Section 106 Consulting Party Meetings.....4-10

Table 4-3. Correspondence from Agencies Following Distribution of the EA.....4-13

Table 4-4. Correspondence From Local Officials and Organizations Following Distribution of the EA4-13

## CHAPTER 1.0 PURPOSE AND NEED

The Virginia Department of Transportation (VDOT), in coordination with the Federal Highway Administration (FHWA) as the lead federal agency, is evaluating an extension of the Interstate 495 (I-495) Express Lanes along approximately three miles of I-495, also referred to as the Capital Beltway, from their current northern terminus in the vicinity of the Old Dominion Drive overpass to the George Washington Memorial Parkway (GW Parkway) in the McLean area of Fairfax County, Virginia. The location of this project, also referred to as the I-495 NEXT project, is shown in the vicinity map in **Figure 1-1**. Pursuant to the National Environmental Policy Act (NEPA) of 1969, as amended, and in accordance with FHWA regulations<sup>1</sup>, this Revised Environmental Assessment (EA) is being prepared to analyze the potential social, economic, and environmental effects associated with the improvements being evaluated.

The GW Parkway and surrounding park land crossed by the I-495 NEXT project is owned by the United States and administered by the National Park Service (NPS). The GW Parkway is a federally-owned recreational and historic property that is listed on the National Register of Historic Places (NRHP). Many of the updates documented in this Revised Environmental Assessment were made to facilitate NPS's use of the document to inform their NEPA decision.

VDOT has a preliminary public-private partnership (P3) framework agreement with Transurban under which Transurban is providing a conceptual design for purposes of NEPA. Property that would be acquired as part of the I-495 NEXT project would become VDOT property.

### 1.1 PROJECT LIMITS

The project extends from approximately south of the Dulles Toll Road (DTR) / Route 267 interchange to the GW Parkway in the vicinity of the American Legion Memorial Bridge (ALMB). Although the proposed lanes would terminate at the GW Parkway, and the interchange provides a logical northern terminus for this study, additional improvements are anticipated to extend approximately 0.3 miles north of the GW Parkway to provide a tie-in to the existing road.

The project also includes access ramp improvements and lane reconfigurations along portions of the DTR and the Dulles International Airport Access Highway, on either side of the Capital Beltway, from the Spring Hill Road Interchange to the Route 123 interchange. The proposed improvements entail new and reconfigured express lane ramps and general purpose lane ramps at the Dulles Interchange and tie-in connections to the Route 123/I-495 interchange. The project has independent utility since it would provide a usable facility and be a reasonable expenditure of funds even if no additional transportation improvements are made in the area, including to the ALMB.

The I-495 NEXT project does not include improvements to the ALMB, which would be constructed by others as part of Maryland's separate proposed I-495 Managed Lane project<sup>2</sup>. VDOT and the Maryland Department of Transportation (MDOT) have been continuously coordinating during development of the

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<sup>1</sup> NEPA and FHWA's regulations for Environmental Impact and Related Procedures can be found at 42 USC § 4332(c), as amended, and 23 CFR § 771, respectively.

<sup>2</sup> Maryland's I-495 Managed Lanes project is part of the I-495 & I-270 Managed Lanes Study, described in more detail in Section 1.3.1. The Draft Environmental Impact Statement (DEIS) is available at <https://495-270-p3.com/DEIS>.



I-495 NEXT project and would continue to do so through final design and construction of their respective, independent projects.

## **1.2 STUDYAREA**

In order to assess and document relevant resources that may be affected by the proposed project, the study area for the EA and this Revised EA extends beyond the immediate area of the proposed project described above. The study area includes approximately four miles along I-495 between the Route 123 interchange and the ALMB at the Maryland state line. The study area also extends approximately 2,500 feet east along the GW Parkway. Intersecting roadways and interchanges are also included in the study area, as well as adjacent areas within 600 feet of the existing edge of pavement. The study area is a buffer around the road corridor that includes all natural, cultural, and physical resources that are analyzed in the EA and this Revised EA. It does not represent the limits of disturbance (LOD) of the project nor imply right-of-way acquisition or construction impact, but rather extends beyond the project footprint to tie into the surrounding network, including tying into future network improvements. **Figure 1-2** depicts the project termini, study area, and LOD.

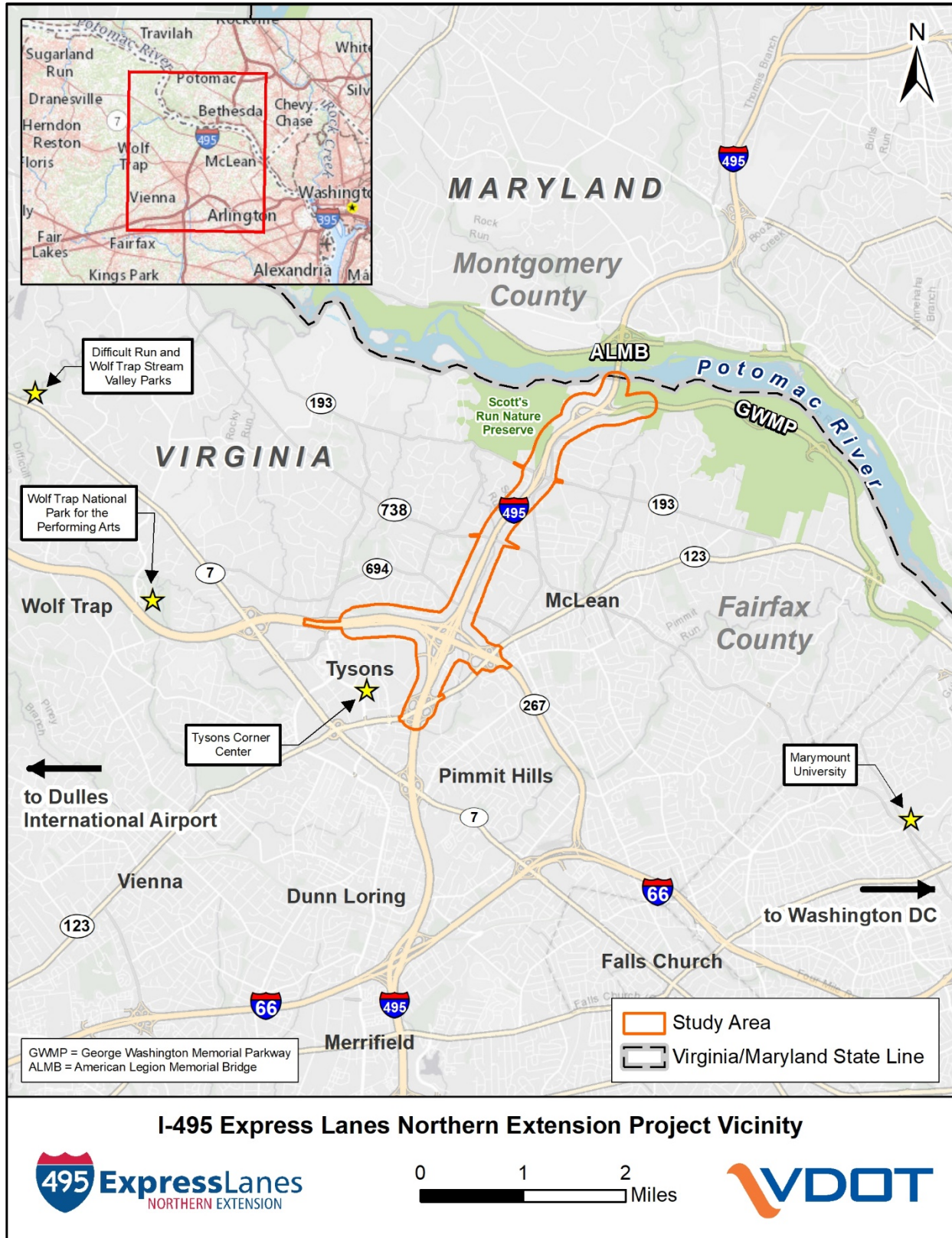


Figure 1-1. I-495 Express Lanes Northern Extension Project Vicinity



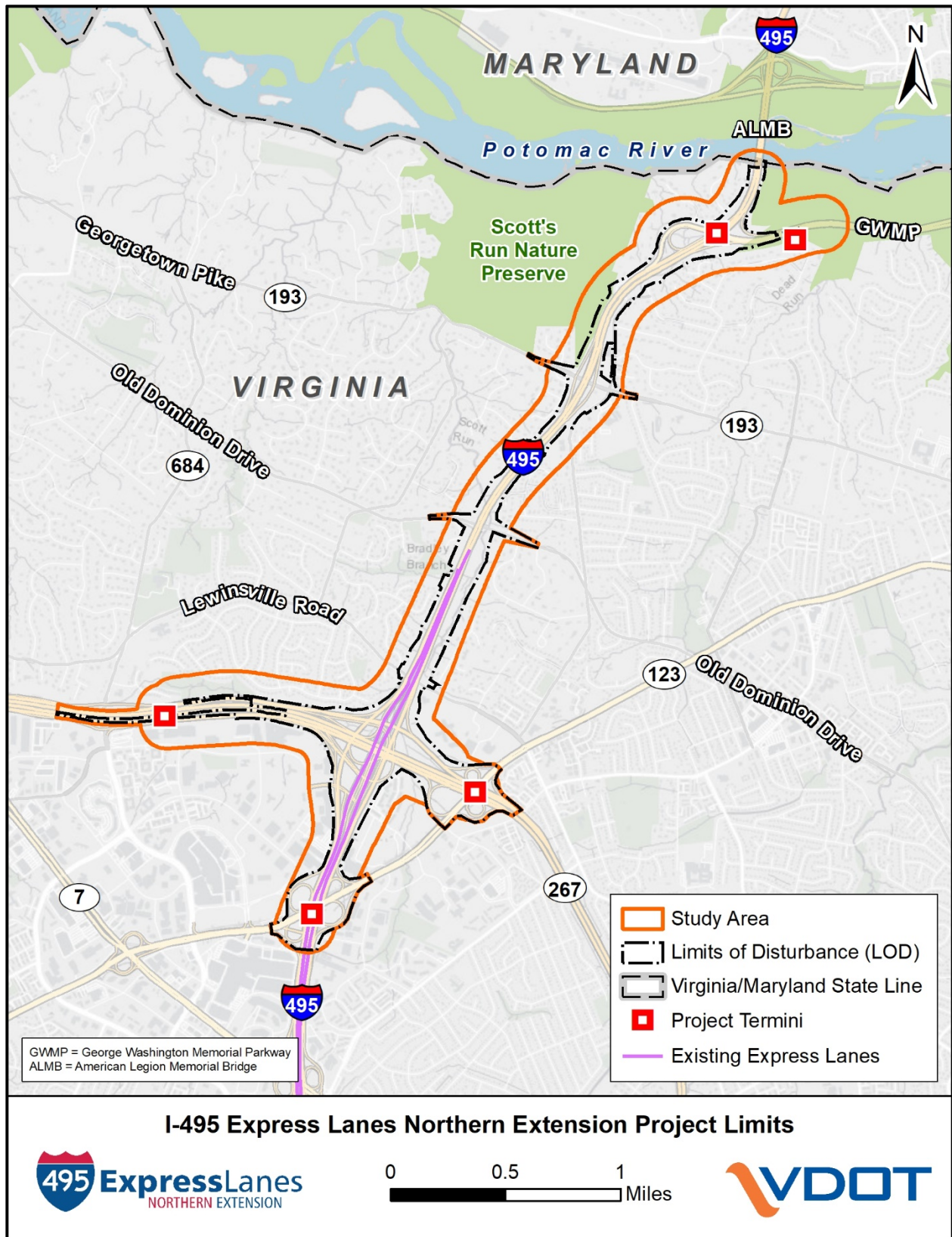


Figure 1-2. I-495 Express Lanes Northern Extension Project Limits



The existing I-495 facility within the study area currently has four northbound and four southbound general purpose (GP) lanes, supplemented in several locations by auxiliary lanes<sup>3</sup>, acceleration/deceleration lanes at on- and off-ramps, and collector-distributor roadways<sup>4</sup>. Grade-separated interchanges provide access to and from I-495 and the Jones Branch Connector; Chain Bridge Road (Route 123); the DTR, Dulles Airport Access Road (DAAR), and Dulles Connector Road (DCR), collectively referred to as Route 267; Georgetown Pike (Route 193); and the GW Parkway. North of the study area, I-495 at the ALMB is a total of 10 lanes, including eight GP through lanes and two auxiliary lanes that connect to Clara Barton Parkway in Maryland and the GW Parkway in Virginia.

The southbound entrance onto the existing I-495 Express Lanes and northbound exit from the I-495 Express Lanes occur within the study area, approximately 2,000 feet south of Old Dominion Drive, as shown in **Figure 1-1**. Drivers are permitted to use the northbound inside shoulder of the GP lanes during peak travel periods (6 AM - 11 AM and 2 PM - 8 PM Mon through Fri). The shoulder lane terminates by merging into the GP lanes just before reaching the GW Parkway interchange. All buses and vehicles with two axles can access the I-495 Express Lanes 24 hours a day, seven days a week. The I-495 Express Lanes operate as high-occupancy toll (HOT) lanes where vehicles with three or more occupants are not charged a toll. Currently, 2-axle single-unit trucks and cars are permitted to use the existing express lanes on I-495, I-395, and I-95; trucks with 3 axles or more are not permitted in the current express lanes network within Virginia. The auxiliary lanes on the outer loop of I-495 connect to the GW Parkway and Georgetown Pike in Virginia.

The southern portion of the study area surrounding the I-495/Route 267 interchange is bounded by high-density commercial and residential development associated with the Tysons area. The study area between the Route 267 interchange and GW Parkway is comprised of suburban neighborhoods and supporting recreational areas that border the interstate, with direct access to I-495 limited to Route 193. North of the GW Parkway approaching the Maryland state line at the ALMB over the Potomac River is primarily NPS parkland associated with the GW Parkway to the east and Scotts Run Nature Preserve, which is Fairfax County parkland, to the west.

### 1.3 PROJECT HISTORY

I-495 (also known as the Capital Beltway) is a 64-mile, multi-lane, circumferential freeway centered around Washington, D.C. and passing through Maryland and Virginia. The Virginia portion of I-495 is 22 miles, extending from the Woodrow Wilson Bridge in the City of Alexandria to the ALMB in Fairfax County.

Initial planning for I-495 began in 1950 with the publication of the 1950 Comprehensive Plan for the Washington area (NCPPC, 1952). Construction of I-495 began in 1957 and was completed in 1964. Originally, I-495 consisted of six lanes for most of its length except for 14.5 miles between the northern Potomac crossing (now the ALMB) and Interstate 95 (I-95) in Springfield, which was four lanes. Since its

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<sup>3</sup> An auxiliary lane is defined by the American Association of State Highway and Transportation Officials (AASHTO) as the portion of the roadway adjoining the traveled way for speed change, turning, weaving, truck climbing, maneuvering of entering and leaving traffic, and other purposes supplementary to through-traffic movement. Auxiliary lanes are used to balance the traffic load and maintain a more uniform level of service on the highway. They facilitate the positioning of drivers at exits and the merging of drivers at entrances (AASHTO, 2018).

<sup>4</sup> Collector-distributor (C-D) roadways are parallel to freeway lanes and are usually located where interchanges are closely spaced. The C-D roads provide additional distance for drivers to make weaving and lane-changing movements.

completion in 1964, many modifications and improvements have been implemented, such as the addition of lanes, construction or modification of interchanges, and safety improvements. In 1977, the Virginia side of I-495 was widened from four to eight lanes up to Route 193 (Georgetown Pike). In 1992, a portion of I-495 between Route 193 and the Interstate 270 (I-270) spur in Maryland was widened to eight lanes, and the ALMB was widened to 10 lanes (eight through lanes and two auxiliary lanes), as shown in **Figure 1-3**.

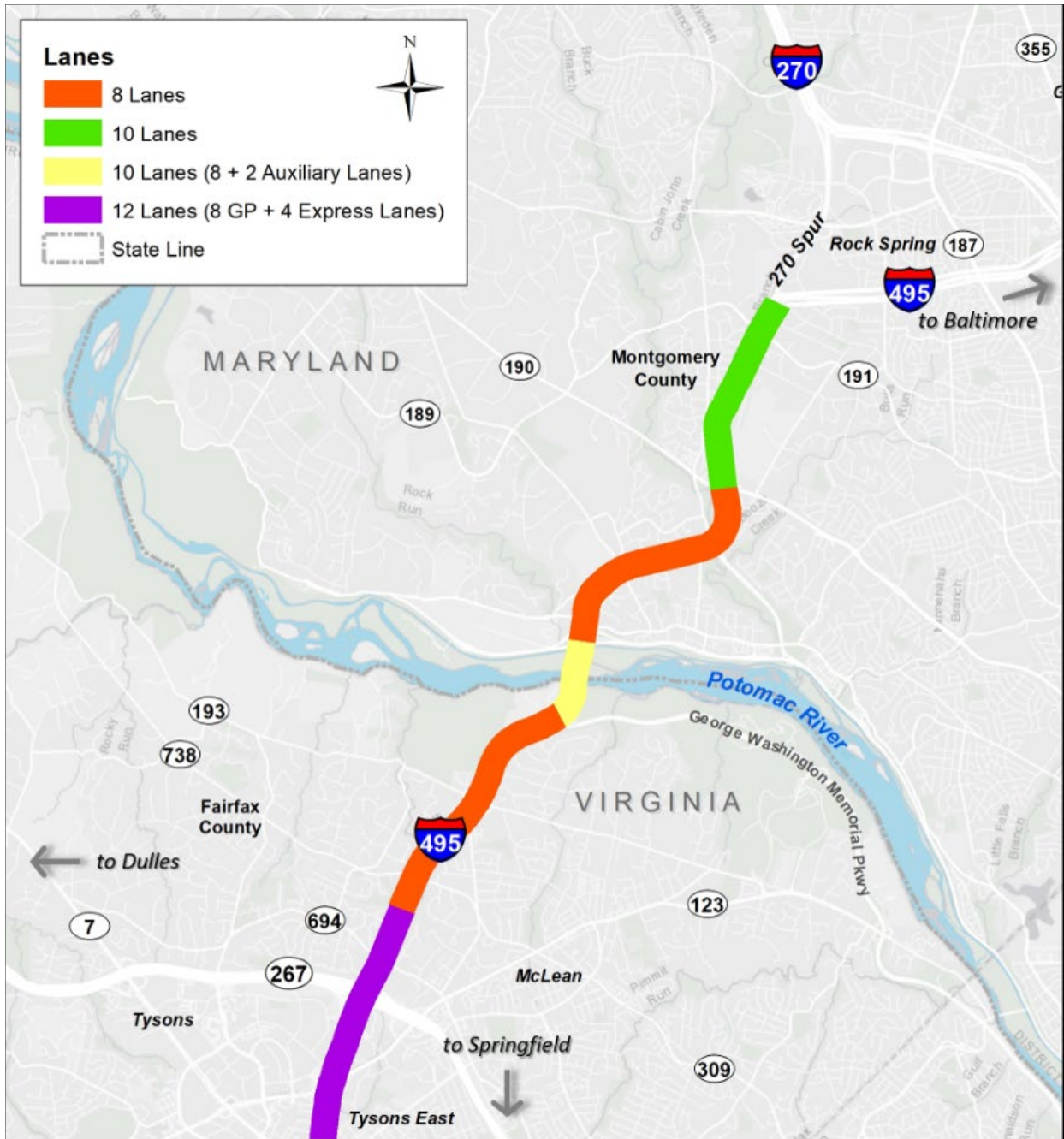


Figure 1-3. Current I-495 Lane Segments

In January 1997, a Major Investment Study (MIS) was completed to evaluate a range of strategies for dealing with transportation deficiencies along the Capital Beltway corridor. The conclusion of the MIS was that highway improvements promoting high-occupancy vehicle (HOV) use, such as designated, non-tolled HOV lanes for vehicles with at least three occupants, would be the most effective transportation investment to serve current and future travel demand on the Capital Beltway (VDOT/FHWA, 2006).

In 1998, following the completion of the MIS, FHWA and VDOT launched preliminary location and environmental studies to evaluate the recommended improvements to the Capital Beltway, including widening for the addition of HOV lanes. Initially, an EA was prepared to determine if preparation of an Environmental Impact Statement (EIS) would be warranted. FHWA and VDOT subsequently determined that due to the large footprint of the project and the potential for environmental consequences, an EIS would be necessary. A Notice of Intent to prepare an EIS was published in the *Federal Register* in June 2000 (VDOT/FHWA, 2006).

FHWA and VDOT prepared the Capital Beltway Study Draft EIS in 2002 to evaluate the expansion and reconfiguration of I-495 from the ALMB to the I-95/I-495/I-395 interchange in Springfield. Initially, only HOV alternatives were proposed: the Concurrent HOV Alternative, in which one HOV lane would be added in each direction with no additional GP lanes; the Express/Local with HOV Alternative, which would separate short- and long-distance trips and provide one HOV lane in each direction; and the Barrier-Separated HOV Alternative, which would provide 12 through lanes in a 4-2-2-4 configuration, with four outer GP lanes and two barrier-separated inner HOV lanes in each direction. In addition, options for interchange configurations and direct access points for HOV traffic to the HOV lanes were evaluated for each alternative. During the public comment period for the Draft EIS, the alternatives were met with opposition from local governments and the general public due to excessive right-of-way acquisition and the displacement of as many as 294 residential properties (VDOT/FHWA, 2006).

Following publication of the Capital Beltway Study Draft EIS in March 2002, VDOT received a proposal pursuant to the Virginia Public-Private Transportation Act (PPTA), which allows for private entities to solicit VDOT to develop and/or operate and maintain transportation facilities that VDOT determines demonstrate a public need and benefit. The PPTA proposal included a plan to add four HOT lanes to 14.5 miles of I-495 between the existing GP lanes from the ALMB to the I-95/I-495/I-395 interchange in Springfield. This option required less right-of-way than the alternatives in the Draft EIS and would substantially reduce relocation impacts. Based on comments received on the Draft EIS and following the submittal of the PPTA proposal for HOT lanes, the three original Build Alternatives and interchange options were substantially revised and re-evaluated with both HOV and HOT lane options, resulting in six “refined” alternatives. Two of these refined alternatives were chosen for further development and more detailed study: the 12-Lane HOT / Managed Lanes Alternative, developed from the Barrier-Separated HOV Alternative presented in the Draft EIS; and a Revised 10-Lane Concurrent HOV Alternative. In January 2005, the Commonwealth Transportation Board (CTB) selected the 12-Lane HOT / Managed Lanes Alternative as the Preferred Alternative to be carried forward in the Final EIS (VDOT/FHWA, 2006). The Final EIS was completed and published in April 2006. FHWA issued a Record of Decision (ROD) in June 2006, approving the selection of the 12-Lane HOT / Managed Lanes Alternative as the Selected Action (FHWA, 2006).

In May 2007, it was determined that a change in the northern project limits was necessary to allow for a transition area between the entrance/exit to the HOT lanes and the ALMB (VDOT, 2007). A NEPA re-evaluation and an Interchange Justification Report (IJR) were completed in 2007 to include design updates and related impacts, and to modify the northern terminus of the HOT lanes from the ALMB to the

current terminus south of Old Dominion Drive. Other NEPA re-evaluations were completed in June 2008, December 2008, May 2009, and July 2009 to account for minor design refinements.

Construction of the I-495 Express Lanes commenced in 2008, and the I-495 Express Lanes opened to traffic in November 2012.

In 2009, while construction was underway for the I-495 Express Lanes, the Metropolitan Washington Airports Authority (MWAA) developed the Dulles Interchange Long-Range Plan for the I-495/Route 267 interchange to determine what, if any, changes to the then-current plan for the interchange under the I-495 Express Lanes project may be necessary to accommodate other future interchange improvements. The Long-Range Plan determined that up to 11 additional ramp movements would be necessary to improve I-495 connections to and from the DAAR and DTR. VDOT in partnership with MWAA signed a Memorandum of Understanding (MOA) in May 2009 to incorporate three of these additional ramps into the I-495 Express Lanes project. Specifically, these ramps provided movements for southbound I-495 GP Lanes to westbound DAAR; eastbound DAAR to southbound I-495 GP; and eastbound DAAR to northbound I-495 GP (VDOT/MWAA, 2009). A NEPA Re-evaluation of the Capital Beltway Study EIS was conducted, and the additional ramps were found to be consistent with the findings of the Final EIS (FHWA, 2009). An IJR for the Dulles Interchange was prepared and approved in December 2009 (VDOT, 2009). The ramps were constructed as part of the I-495 Express Lanes project and opened to traffic in September 2012.

### 1.3.1 Other Projects in the Vicinity

The following ongoing projects and studies are proposed within or in close proximity to the study area:

- **Dulles Interchange Long-Range Plan** – Future phases of the Dulles Interchange Long-Range Plan propose additional ramps at the I-495/Route 267 interchange that are not currently included as part of the proposed project. Future ramps to be constructed within the study area include:
  - **Ramp D1:** Modified access from eastbound DAAR to southbound I-495 and Route 123
  - **Ramp G8:** Modified access from eastbound DTR to southbound I-495 GP lanes
  - **Ramp D4:** New access from northbound I-495 GP lanes to westbound DAAR
  - **Ramp G2:** Modified Access from northbound I-495 GP lanes to westbound DTR
  - **Ramp D3:** New access from southbound I-495 GP lanes to westbound DAAR
  - **Ramp G5:** Modified Access from southbound I-495 GP lanes to westbound DTRConstruction of these new ramps is expected to occur by 2030. The I-495 NEXT project would be designed to be compatible with the planned construction of these future ramps.
- **I-495 and I-270 Managed Lanes Study and EIS** – The purpose of this study is to address congestion and improve trip reliability on I-495 from south of the ALMB in Fairfax County, Virginia to west of Maryland (MD) 5 and on I-270 from I-495 to I-370, including the I-270 east and west spurs, in Montgomery County, Maryland. A wide range of preliminary alternatives were considered, and alternatives studied in detail included HOT lanes or Express Toll Lanes (ETL) on I-495 and included carrying the improvements across the ALMB. This study is the first element of a broader Traffic Relief Plan as announced by Maryland Governor Larry Hogan in September 2017, which considers improvements along the entire length of I-495 and I-270.

On November 12, 2019 Maryland Governor Hogan and Virginia Governor Northam signed an accord to replace the ALMB and relieve congestion on the Capital Beltway. The new planned infrastructure across the Potomac River includes replacement of existing lanes in each direction



and the addition of two new Express Lanes in each direction for approximately three miles between the GW Parkway in Virginia to the vicinity of River Road in Maryland. New bicycle and pedestrian access would connect trails on both sides of the Potomac River. These improvements are part of the MDOT Recommended Preferred Alternative<sup>5</sup>. The I-495 NEXT project is an independent, stand-alone project that is being closely coordinated and would be compatible with plans for the I-495 and I-270 Managed Lanes Study. The ROD is anticipated to be completed by Fall 2021<sup>6</sup>, with construction planned to be completed by 2027.

- **Jones Branch Connector** – This project includes the construction of a new link from Jones Branch Drive across I-495 to Route 123 in Fairfax County. The half-mile project includes new roadway and improvements from Jones Branch Drive and the Jones Branch Connector to the intersection of Scotts Crossing Road and Route 123. Project features include: two travel lanes and on-street bike lanes in each direction; three bridges over the I-495 Express and GP lanes; 8- to 12-foot-wide lighted sidewalks, landscaping and other streetscape amenities; and a wide, raised median to accommodate the future Tysons Circulator bus. The project was partially opened to traffic in December 2018 with one lane of traffic in each direction. Construction has been substantially completed as of August 2020.
- **Tysons/Old Meadow Road Bike/Ped Improvements** – This project involves construction of a 10-foot shared use path from the intersection of Route 123 and Old Meadow Road east of I-495 to a location near the intersection of Tysons One Place and Fashion Boulevard west of I-495. The shared use path would be located along the west side of Old Meadow Road. The first phase of the project includes the construction of a bicycle and pedestrian bridge over I-495. The project is currently being prepared for advertisement for construction bids. Construction is expected to be completed by July 2022.
- **2016 GW Parkway North Section Rehabilitation EA** – This project includes reconstructing the asphalt pavement and constructing new concrete curbs; replacing drainage inlets and culverts; stabilizing erosion at drainage outfalls; improving safety with options including crash-worthy roadside barriers; various options to reconfigure the interchange at Route 123/GW Parkway; and other smaller project elements such as creation of emergency turnarounds, extension of acceleration and deceleration lanes, and installation of stormwater management practices. NPS issued a Finding of No Significant Impact (FONSI) on September 13, 2018. A construction schedule has not yet been established.
- **McLean Area Traffic Analysis** – Since 2017, VDOT and Fairfax County have worked with the surrounding community to identify short-term, intermediate, and long-term solutions to mitigate residential street traffic congestion and I-495 access at the Balls Hill Road and Georgetown Pike intersection. Short-term improvements recently completed include additional signage, pavement markings, traffic cameras, and shoulder improvements for police enforcement. Fairfax County has initiated the cut-through restriction process with the surrounding neighborhood and is currently reviewing improvement options for the Balls Hill Road/Georgetown Pike and Douglass Drive/Georgetown Pike intersections.

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<sup>5</sup> <https://495-270-p3.com/environmental/alternatives/rpa/>

<sup>6</sup> Information from the February 2021 press release: <https://495-270-p3.com/wp-content/uploads/2021/02/MDOT-Selects-Developer-for-American-Legion-Bridge-I-270-P3-2.18.2021.pdf>

## 1.4 NEEDS FOR THE PROJECT

The following transportation needs have been identified for the study area:

- Reduce congestion;
- Provide additional travel choices; and
- Improve travel reliability.

### 1.4.1 Reduce Congestion

As demonstrated in the *I-495 Traffic and Transportation Technical Report* (VDOT, 2020d), incorporated herein by reference, I-495 within the study area is severely congested during the weekday AM and PM peak periods in both directions, especially along I-495 northbound approaching the ALMB. The AM peak period occurs between 6:45 AM and 9:45 AM. The PM peak period occurs between 2:45 PM and 5:45 PM. Congestion is increasingly spreading beyond these peak periods as motorists either change their departure times to avoid delay or travel during the periods of highest congestion resulting in trips taking substantially longer, especially in the PM peak period.

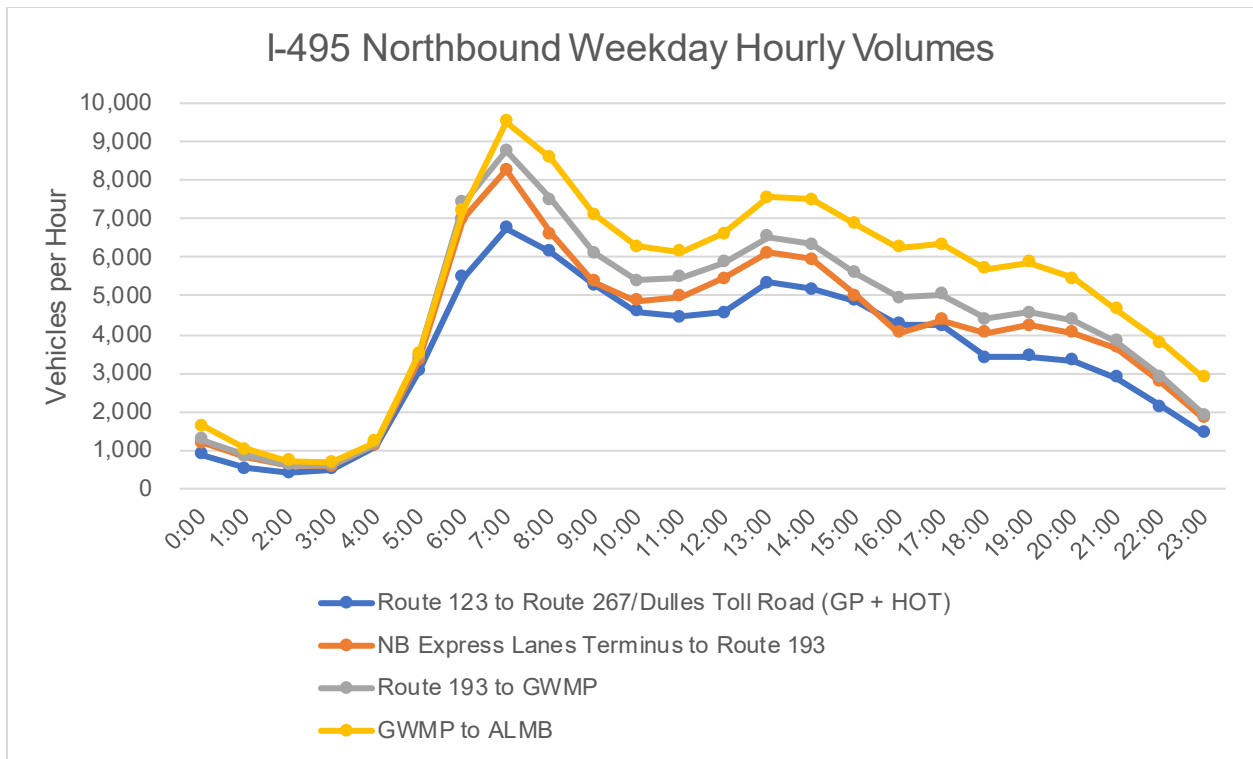
#### ***Traffic Volumes and Travel Demand***

Over the past 15 years (2002 to 2017), the Average Annual Daily Traffic (AADT) for I-495 at the ALMB has grown from 197,000 to 233,000, an 18 percent increase (VDOT, 2017). Projected growth in population and employment, particularly in Tysons, is forecasted to substantially increase in future years and additionally strain highway capacity.

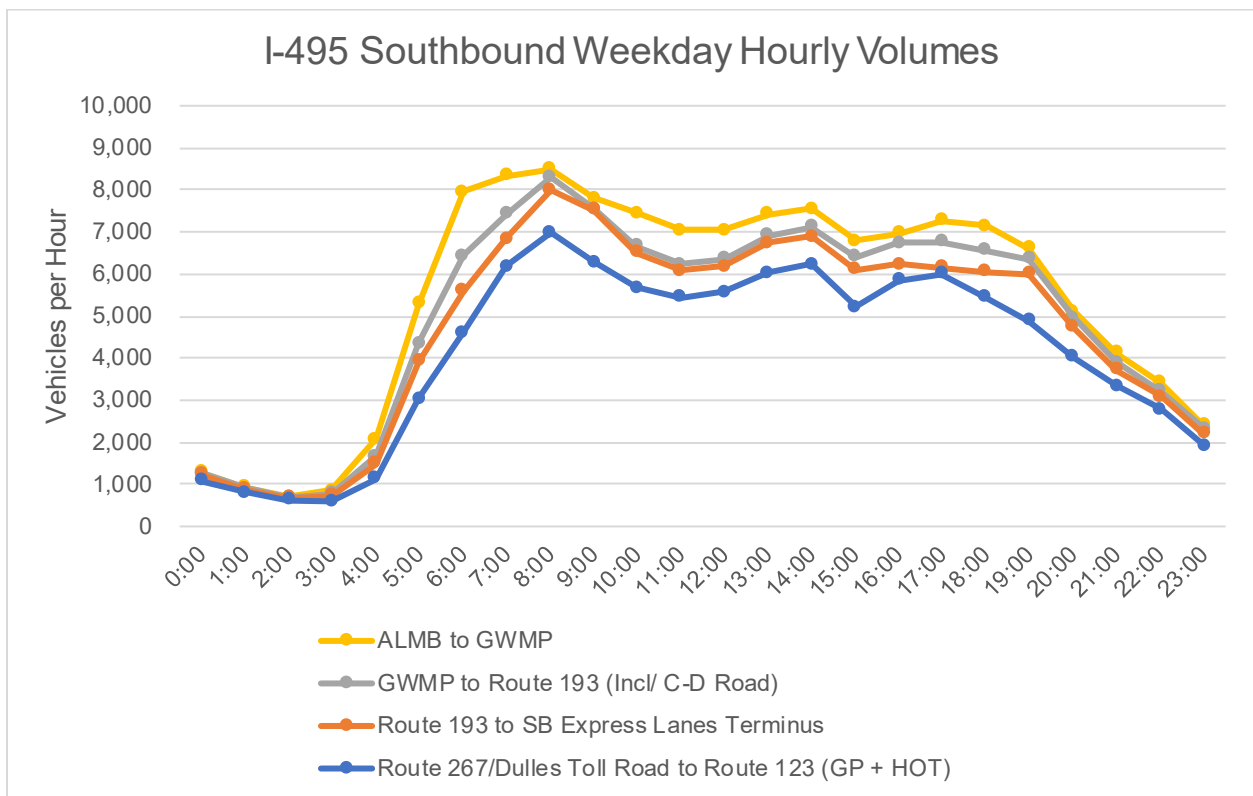
#### Existing (2018) Traffic Volumes

A sample of 2018 mainline I-495 count data is presented in **Figure 1-4** and **Figure 1-5**, representing the average weekday hourly volumes in the northbound and southbound directions, respectively, at four locations along the I-495 corridor. The curves shown in the figures depict the expected distribution of volume during an average weekday in the northbound and southbound directions, with the highest throughput volumes observed during the AM peak period in both directions. Note that especially in the northbound direction, traffic volumes *decrease* over the course of the AM and PM peak periods, as congestion constrains throughput along the corridor (as discussed in the Traffic Operations section in the following pages). This is especially pronounced during the PM peak period, where the throughput along the corridor is much lower than the hypothetical capacity of an eight-to-ten-lane freeway. Corridor traffic volumes are generally highest in both directions over the ALMB between the GW Parkway and Clara Barton Parkway.





**Figure 1-4. Average Weekday Hourly Volumes along I-495 Northbound**

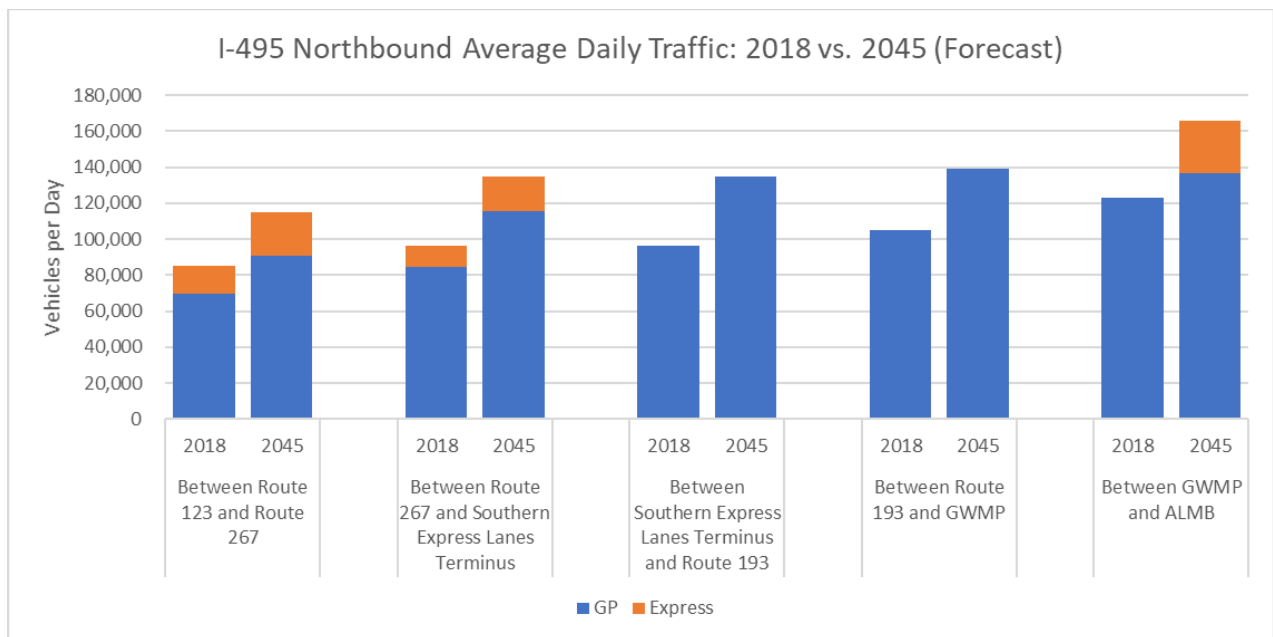


**Figure 1-5. Average Weekday Hourly Volumes along I-495 Southbound**

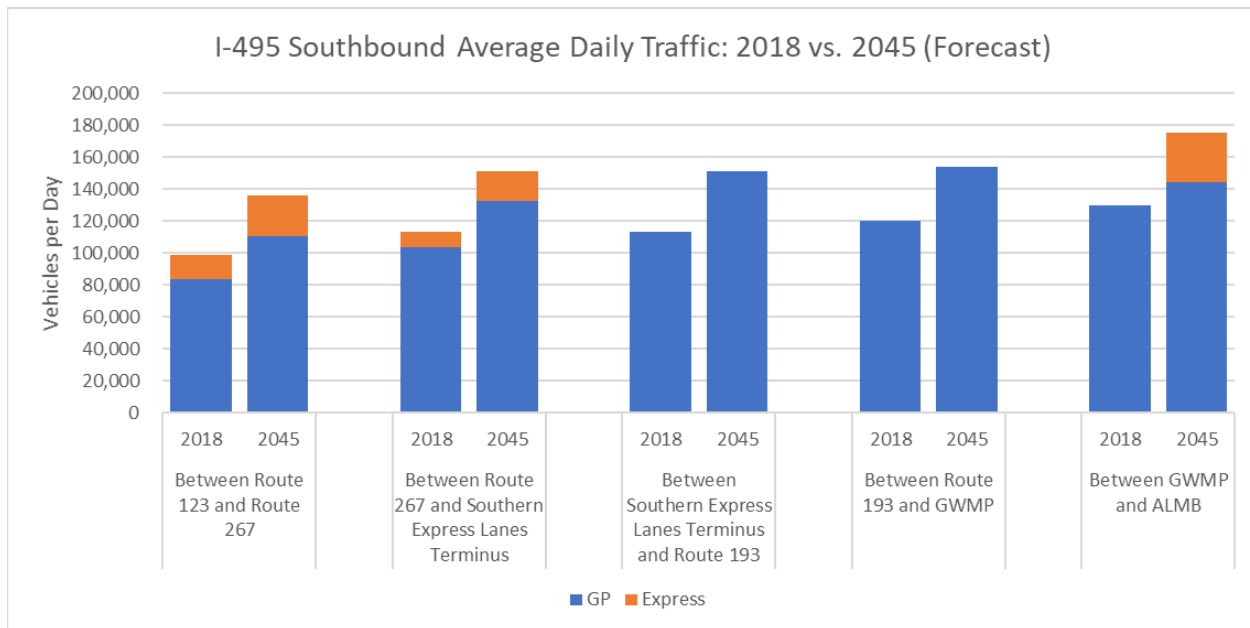
The existing high traffic volumes can be partially attributed to the substantial population growth that has occurred in recent years within the study area and the Washington, D.C. region as a whole. The Washington, D.C. region’s population increased from 4.4 million to 5.7 million residents between 2000 and 2018. Fairfax County is the most populous locality in the region, at over 1.1 million residents. As the population has increased, regional employment has followed suit, adding almost 400,000 jobs from 2000 to 2016. As the only direct transportation link between Fairfax and Montgomery Counties, and with no other transit service available, I-495 experiences heavy use by commuters driving private, single-occupant vehicles (Versel, 2013).

**Future Traffic Volumes**

A comparison of Existing (2018) and 2045 No Build average daily traffic volumes for the northbound and southbound GP and Express Lanes on I-495 is shown in **Figure 1-6** and **Figure 1-7**.



**Figure 1-6: I-495 Northbound Average Daily Traffic: 2018 vs. 2045 No-Build (Forecast)**



**Figure 1-7: I-495 Southbound Average Daily Traffic: 2018 vs. 2045 No-Build (Forecast)**

As shown in **Figure 1-6** and **Figure 1-7**, overall and peak period traffic volumes are forecasted to increase in the future and would exceed the carrying capacity of the corridor to a greater degree. These high volumes would be driven primarily by projected population and employment growth in the region. Between 2015 and 2045, the regional population is expected to increase by 1.4 million (26% growth), and the number of jobs by 1 million (32% growth), as project by the Metropolitan Washington Council of Governments (MWCOCG) in their October 2018 report on *Cooperative Forecasting in Metropolitan Washington*. In the area adjacent to the project corridor, approximately 96% of the housing units are currently occupied. Due to rapid population growth and limited existing housing available, the MWCOCG anticipates that many residents would be forced to find housing further away from employment centers, making transit, bicycling, or walking to work less feasible. Commuting options for these residents would therefore be limited to single-occupancy or high-occupancy personal vehicles, increasing traffic volumes and travel demand on roadways. The increase in traffic volumes would lead to more severe and a longer duration of congestion during both the AM and PM peak periods, as discussed in the next section. Therefore, there is a need to accommodate increased traffic volumes and travel demands for single- and high-occupancy vehicles as population and employment continue to grow within the region.

**Traffic Operations**

Existing Conditions

Due to the over-capacity conditions along I-495 during peak periods in both directions, the resulting congestion reduces travel speeds and increases travel times for users. The I-495 corridor in the study area does not have a typical commuting traffic pattern where a morning peak occurs in the one direction and an afternoon peak occurs in the opposite direction. Instead, the corridor experiences congestion in both the northbound and southbound directions in both peak periods, with commuters traveling from suburban areas to work and vice versa in both directions, in addition to substantial interstate long-distance travel utilizing the corridor. In both peak periods, congestion is more severe in the northbound direction due to a bottleneck at the ALMB.

Congestion is increasingly spreading beyond these peak periods as motorists either change their departure times to avoid delay or travel during the periods of highest congestion resulting in trips taking substantially longer, especially in the PM peak period.

A study of average weekday (Tuesday-Thursday) travel speeds in 15-minute intervals along I-495 northbound through the study area shows that within the study area, congestion is experienced for nearly 10 hours on an average weekday (approximately four hours during the AM peak period and nearly six hours during the PM peak period). More detail is in the *I-495 Traffic and Transportation Technical Report* (VDOT, 2020d).

General characteristics of congestion on the corridor include:

- **Substantial multi-hour queues in both directions.**
  - Bottlenecks created by major merge areas, as experienced in the northern terminus of the study area.
  - Bottlenecks created due to lane drops, such as the I-495 northbound GP merge where the shoulder lane terminates.
  - Bi-directional demand and weaving result in congestion in both directions during both peak periods, such as weaving along I-495 northbound GP between the on-ramp from Route 193 and the off-ramp to GW Parkway.
  - The on-ramp from the GW Parkway to I-495 northbound frequently queues back onto the GW Parkway outbound/westbound mainline for several miles to as far back as the GW Parkway/Route 123 interchange.
  - In the northbound direction along I-495, the AM peak period lasts almost four hours, and the PM peak period lasts for more than six hours. In the southbound direction, the AM peak period lasts approximately two hours and the PM peak period lasts for approximately five hours.
- **Heavy volumes entering and exiting I-495 at the Route 267 interchange affect traffic in both directions for extended periods.**
  - Heavy demand from Route 267 entering an already congested segment of I-495 results in more congestion and queue spill-backs. The I-495 northbound GP on-ramp from DTR/DAAR eastbound frequently spills back to the DTR/DAAR mainlines due to heavy demand and congestion along I-495 northbound GP. The I-495 southbound GP on-ramp from DTR/DAAR eastbound creates weaving issues along I-495 southbound, as the off-ramp to Route 123 and destinations in Tysons is just downstream of this location.
- **Cut-through traffic on local parallel arterials creates more disturbance along mainline.**
  - Vehicles detouring to avoid I-495 congestion create more disturbance to the flow of traffic by exiting to use parallel arterial facilities, such as Balls Hill Road and Swinks Mill Road, and then entering again at downstream locations along I-495, such as at Route 193.
- **High-Occupancy Toll (HOT) traffic to and from the I-495 Express Lanes weaving in and out from GP lanes results in severe congestion.**
  - The speed differential as well as weaving in and out from the I-495 Express Lanes that have ingress and egress just north of the Route 267 interchange create congestion in the GP lanes.

### Future Conditions

Travel times and speeds along I-495 within the study area are forecasted to worsen in the future, as increasing traffic volumes from population and employment growth cause more severe and longer durations of congestion during peak periods. Therefore, there is a need to accommodate increased traffic volumes and travel demand in order to reduce congestion along the corridor as population and employment continue to grow within the region. Future traffic operational conditions are discussed in more detail in the *I-495 Traffic and Transportation Technical Report* (VDOT, 2020d).

### **1.4.2 Provide Additional Travel Choices**

Pursuant to Federal regulations, the MWCOG Transportation Planning Board (TPB) encourages the consideration of alternative congestion management strategies for projects that would increase single-occupancy vehicle capacity (TPB, 2018). Furthermore, as determined in the Capital Beltway Study EIS, simply adding capacity to I-495 via additional GP lanes would be extremely costly and would result in excessive property and environmental impacts. Therefore, a more innovative approach is needed for the I-495 corridor in order to manage congestion and travel demand without adding capacity to the GP lanes.

### ***Existing Conditions***

According to a commuting survey conducted by MWCOG in 2016, nearly half (48 percent) of those surveyed who use HOV/Express Lanes for commuting said availability of the lanes influenced their mode choice decision. The survey also indicated that the presence of Express Lanes encourages the use of carpooling and vanpooling; nine percent of commuters who had access to an HOV/Express Lane reported carpooling or vanpooling as their primary mode choice, compared with five percent of commuters who did not have access. The existing I-495 and I-95 Express Lanes create a 40-mile HOV and bus network in northern Virginia and provide additional travel choices for a variety of users. However, because the existing Express Lanes end at Old Dominion Drive, travel choices for all northbound travelers are limited. No commuter bus service is offered within the study area or over the ALMB due to the absence of dedicated or managed lanes that would allow buses to travel more efficiently. Both HOV and single-occupant vehicles choosing to use the existing Express Lanes are forced to rejoin the GP lanes north of Old Dominion Drive with no options to bypass congestion or bottlenecks. Therefore, there is no advantage or incentive for travelers to choose carpooling, vanpooling, or transit options because these options are no more efficient than driving alone. Without dedicated transit or HOV/HOT lanes, single-occupant vehicle travel is the dominant mode choice within the corridor. Additionally, there is no opportunity to attract users away from the congested GP lanes, which would reduce the overall trip demand and congestion in the GP lanes. There is a need to provide options for and incentivize high-occupancy travel modes to reduce overall vehicle trips, particularly single-occupancy vehicles, in accordance with TPB recommendations.

Commuter choices are also affected by access. The northbound and southbound I-495 Express Lanes are accessible in both directions from Westpark Boulevard and Jones Branch Drive. From Route 7 and eastbound DTR/DAAR, only the southbound Express Lanes are accessible.

There is currently no direct access to the northbound Express Lanes from the DTR, the DAAR, or Route 7. There is also no direct access to and from the Express Lanes in either direction from GW Parkway. Users are less likely to use the Express Lanes if the access points are inconvenient and insufficient for their needs. There is a need to facilitate access to high-occupancy travel modes to further encourage users to choose alternatives to single-occupancy travel.

North-south pedestrian trails and bicycle facilities are lacking within the study area. Bicyclists desiring to travel through this corridor currently ride in travel lanes on arterial and local roadways. In the study area and adjacent areas, the existing network of trails and bicycle and pedestrian facilities are fragmented, mainly oriented east-west, and do not connect with each other, nor facilitate north-south travel. As discussed in **Chapter 3**, under **Section 3.3.1**, the population in the study area has been growing faster than the surrounding areas within Fairfax County, with increasing demands for multimodal and nonvehicular travel choices. Therefore, there is a need to provide a connected network of trails and pedestrian/bicycle facilities linking together the existing fragmented system.

### ***Future Conditions***

As discussed in **Section 1.3.1**, traffic volumes are forecasted to increase in the future due to expected population and employment growth in the Washington, D.C. area, which would exacerbate existing congestion problems in the corridor. Travel choices for both northbound and southbound travelers would continue to be limited within the study area because all Express Lanes users would be forced to merge into the GP lanes, as they do today, with no incentive to convert to a higher-occupancy mode of travel. Therefore, single-occupant vehicle travel would continue to be the dominant mode within the corridor. The GP lanes would experience no congestion relief from users choosing alternate modes. Under the No Build condition, use of the existing Express Lanes capacity would not be maximized due to lack of convenient access points. Due to expected increases in traffic volumes in the future, there is a need to provide long-term options and incentives for high-occupancy travel modes in order to minimize future increases in overall vehicle trips within the study area.

The *Fairfax County Comprehensive Plan* (Fairfax County, 2017) and *Fairfax County Bike Master Plan* (Fairfax County, 2014) include a new north-south multi-use trail parallel with I-495 to address growing demand for non-motorized travel options. A new north-south trail would improve travel options and be consistent with local approved transportation plans.

### **1.4.3 Improve Travel Reliability**

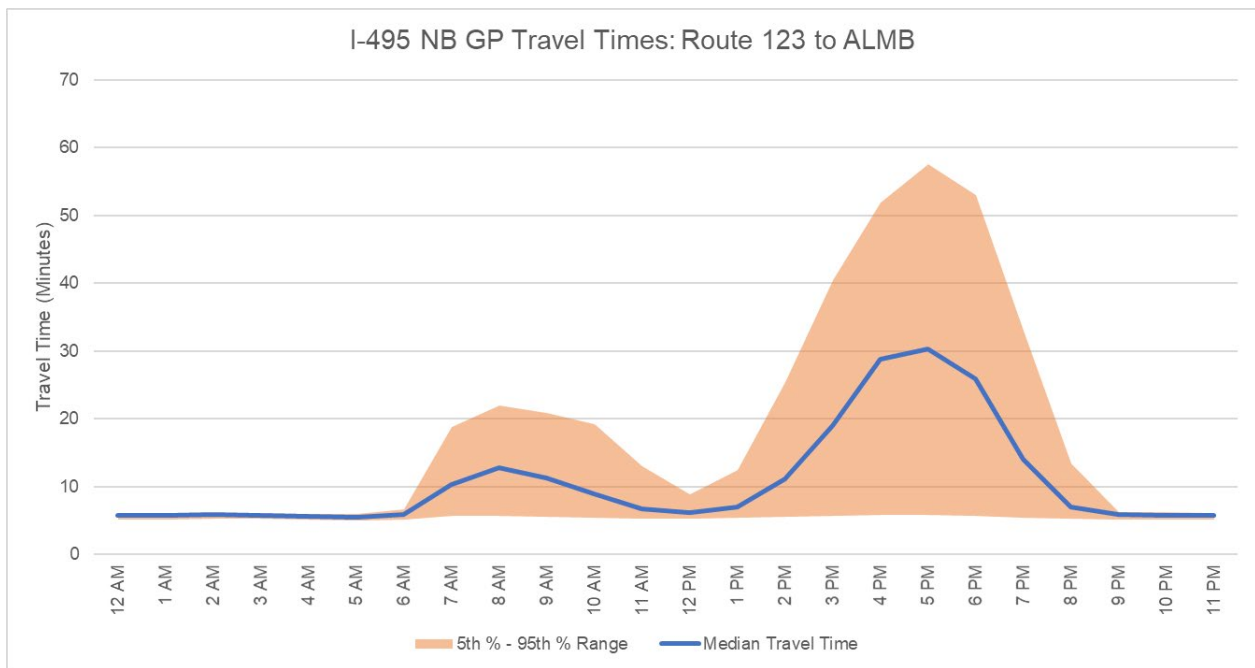
#### ***Existing Conditions***

Travel speeds along I-495 within the study area for both the GP and the Express Lanes are highly inconsistent and can vary substantially by hour and by day, with the slowest speeds and heaviest queues occurring along I-495 northbound during both AM and PM peak periods. Average travel times during peak periods can be several multiples of the free-flow travel time. Furthermore, there is substantial variability in travel times, with 95<sup>th</sup> percentile travel times during peak periods that have been found to be substantially higher than the average or free-flow travel times. The following sections present existing travel times based on INRIX data.

Northbound GP Lanes

**Figure 1-8** provides a graph of average weekday travel times throughout the day along the I-495 northbound GP lanes through the study area, between Route 123 and the ALMB. The I-495 northbound GP lanes have the highest travel times and greatest variability of all freeway segments in the study area during both the AM and PM peak periods.

- During the AM peak period, median travel times are approximately 13 minutes, or approximately twice the off-peak travel time of less than six minutes. Travel times can be substantially higher, as evidenced by 95<sup>th</sup> percentile travel times of approximately 22 minutes.
- During the PM peak period, median travel times are approximately 30 minutes, or more than five times the off-peak travel time of less than six minutes. There is substantial variability in travel times, as evidenced by 95<sup>th</sup> percentile travel times that approach nearly one-hour for a segment that is less than five miles in length.



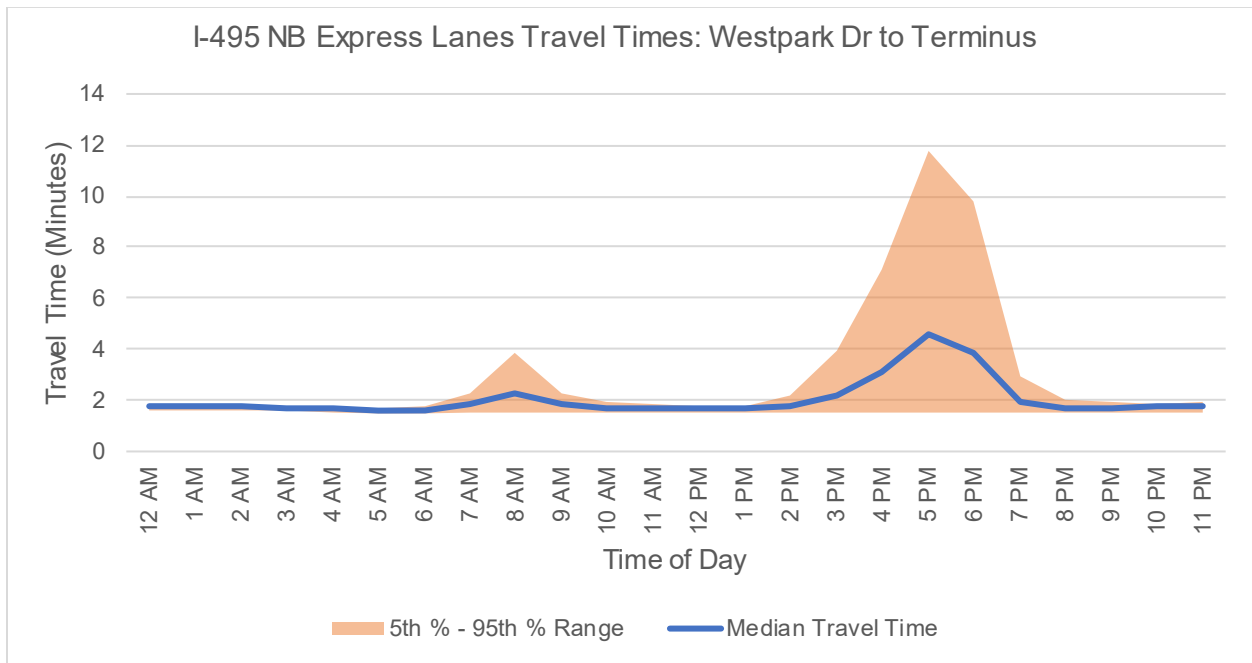
**Figure 1-8. Average Weekday Travel Times, I-495 Northbound GP Lanes Through Study Area**



Northbound Express Lanes

**Figure 1-9** provides a graph of average weekday travel times throughout the day along the I-495 northbound Express Lanes through the 5-mile long study area, from Westpark Drive to the northern Express Lanes terminus. The I-495 northbound Express Lanes experience speeds slower than free-flow during both the AM and PM peak periods (especially in the PM peak period) due to downstream congestion along the I-495 northbound GP lanes, into which the Express Lanes must merge.

- During the AM peak period, median travel times are approximately 2.25 minutes, and can be as high as 4 minutes. The median travel time is approximately 30 seconds longer than free-flow time.
- During the PM peak period, median travel times are approximately 4.5 minutes, and can be as high as 12 minutes. The median travel time is approximately 2.5 times the free-flow travel time.

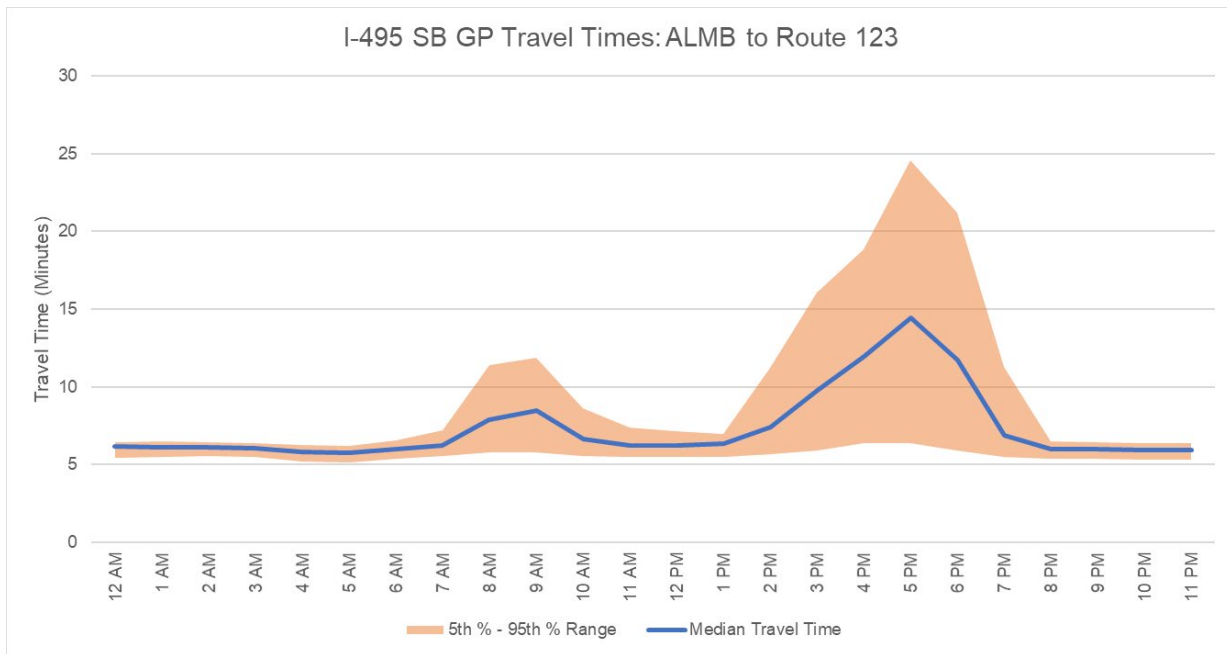


**Figure 1-9. Average Weekday Travel Times, I-495 Northbound Express Lanes Through Study Area**

**Southbound GP Lanes**

**Figure 1-10** provides a graph of average weekday travel times throughout the day along the I-495 southbound GP lanes through the 5-mile long study area, between Clara Barton Parkway and Route 123. The I-495 southbound GP lanes see increases in median travel times during both the AM and PM peak periods; similar to the northbound GP lanes, congestion is more severe during the PM peak period.

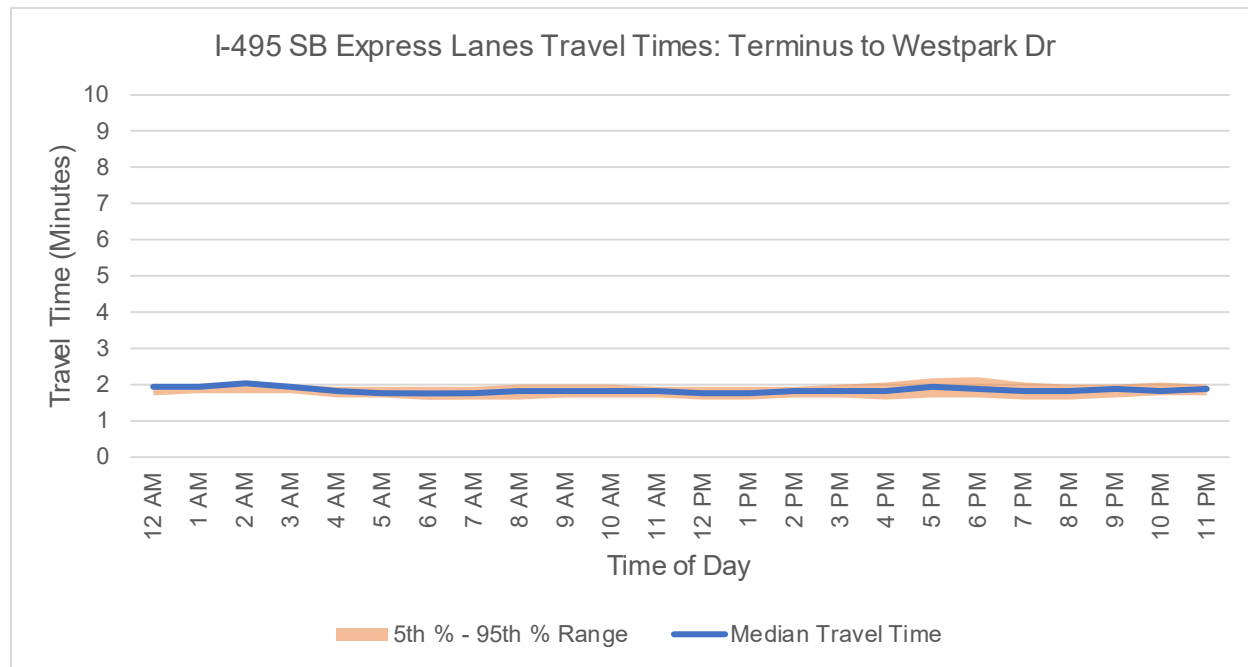
- During the AM peak period, median travel times are approximately 8.5 minutes, and can be as high as 12 minutes. The median travel time is approximately 2.5 minutes higher than the free-flow travel time.
- During the PM peak period, median travel times are approximately 14.5 minutes, and can be as high as 25 minutes. The median travel time is more than twice the free-flow travel time.



**Figure 1-10. Average Weekday Travel Times, I-495 Southbound GP Lanes Through Study Area**

Southbound Express Lanes

**Figure 1-11** provides a graph of average weekday travel times throughout the day along the I-495 southbound Express Lanes through the study area, between the current northern terminus (just north of Old Dominion Drive) and Westpark Drive. The I-495 southbound Express Lanes see free-flow speeds throughout the day due to congestion pricing; there is no downstream congestion impacting operations.



**Figure 1-11. Average Weekday Travel Times, I-495 Southbound Express Lanes Through Study Area**

As shown in **Figure 1-11**, the southbound Express Lanes allow for a consistent, predictable travel time. However, in the absence of transit or HOV/HOT lanes in the northbound direction, there is no northbound travel option along I-495 between Route 267 and the GW Parkway that guarantees a consistent travel time regardless of time of day, congestion, crashes, weather events, or other factors. All users within the study area are equally affected by variable travel speeds and times, including single occupancy, HOV, transit, and freight vehicles. Because of the inconsistent traffic flow within the study area, travel times to and from the GW Parkway and points south are unreliable and difficult to predict, requiring users to allow extra time for travel to guarantee that they would arrive on time. A 2016 commuter survey conducted by MWCOG revealed that over 80 percent of commuters in the region add extra time to their commutes to account for travel time variability (MWCOG, 2016). Motorists who report using HOV or Express Lanes save an average of 20 minutes on their commute; however, due to congestion and reduced travel speeds at the northern terminus of the northbound I-495 Express Lanes, users traveling northbound towards the GW Parkway are unable to reap the full travel time reliability benefits of the existing Express Lanes, as shown in **Figure 1-9**. There is a need to provide consistent, reliable, predictable travel times for all users of I-495 within the study area.

**Future Conditions**

As discussed in **Section 1.3.1** and above, the duration and extent of congestion within the study area is expected to increase with population, employment, and subsequent traffic volumes. Variability in travel speeds and travel times is therefore expected to worsen in the future. Therefore, there is a need to provide consistent, reliable, predictable travel times for future users of I-495 within the study area.

**1.5 PROJECT PURPOSE**

Based on the existing and future transportation conditions described above, the purpose for the extension of Express Lanes on I-495 between Route 267 and the GW Parkway is to:

- **Reduce congestion**—Regional travel demand forecasting shows increased traffic volumes and travel demands as population and employment continue to grow within the region;
- **Provide additional travel choices**—Access to high-occupancy travel modes encourages drivers to choose alternatives to single-occupancy travel as well as provide an option to single-occupancy drivers to use the Express Lanes and free up capacity on the GP lanes, and the addition of north-south pedestrian and bike facilities, which are currently lacking, improves travel choice; and
- **Improve travel reliability**—Duration and extent of congestion is expected to increase along with population and employment growth resulting in the need for commuters to spend additional time traveling to work. Travel times in the GP lanes are expected to continue to be increasingly unreliable for all roadway users, with median peak period travel times notably higher than free-flow travel times.

## CHAPTER 2.0 ALTERNATIVES

This chapter describes the alternative development process and detailed descriptions of the No Build and Build Alternative carried forward for evaluation.

### 2.1 ALTERNATIVE DEVELOPMENT

Based on the established Purpose and Need and coordination with local governments, stakeholders, and the public, one build alternative was developed and evaluated in detail. This conceptual alternative (the Build Alternative) includes extending the Express Lanes system on Interstate 945 (I-495) north to the American Legion Memorial Bridge (ALMB). In addition, there may be design options considered when the project advances beyond the National Environmental Policy Act (NEPA) phase to the more detailed permitting and design phases. The evaluation of one Build Alternative in detail in this Revised Environmental Assessment (EA) is consistent with Federal Highway Authority's (FHWA) Technical Advisory T 6640.8A *Guidance for Preparing and Processing Environmental and Section 4(f) Documents* (FHWA, 1987). A No Build Alternative is also under consideration and is described in **Section 2.3.1**.

The following sections summarize the alternatives, which are described in more detail in the *I-495 Alternatives Development Technical Memorandum* (VDOT, 2020a) and the *I-495 Traffic and Transportation Technical Report* (VDOT, 2020d).

### 2.2 ALTERNATIVES UNDER CONSIDERATION

#### 2.2.1 No Build Alternative

In accordance with the implementing regulations for NEPA (40 C.F.R. § 1502.14(d)), the No Build Alternative has been retained for detailed study and serves as a benchmark for comparison with the Build Alternative. The No Build Alternative would retain the existing lane configuration through the study area and allow for routine maintenance and safety upgrades, except for those modifications to the roadway network that have been programmed and approved for implementation by 2045, as identified in the most recent *National Capital Region Constrained Long Range Plan* (CLRP), including the Maryland Managed Lane project.

Prepared by the National Capital Region Transportation Planning Board (NCRTPB), which is the designated Metropolitan Planning Organization for the Washington, D.C. region under the Metropolitan Washington Council of Governments (MWCOCG), the current CLRP includes projected transit and traffic, demographic, and air quality conditions through the 2045 horizon year. The most recent 2045 CLRP was adopted in October 2018 (NCRTPB, 2018).

The planned and programmed transportation projects within the study area, included in the MWCOCG CLRP and assumed under the No Build Alternative, are identified in **Table 2-1**.

**Table 2-1. No Build Projects within the I-495 Study Corridor**

CLRP ID	Project Name	Description	Completion Date
3186/VI4IHOTA	Dulles Airport Access Road (DAAR)/I-495 Capital Beltway Interchange Flyover Ramp Relocation (Phase IV DAAR)	Relocate ramp from Eastbound (EB) DAAR to Northbound (NB) I-495 General Purpose (GP)	2030
3186/VI4IHOTA	DAAR/I-495 Capital Beltway Interchange Flyover Ramp Relocation (Phase IV DAAR)	Widen ramp from EB Dulles Toll Road ramp to NB I-495 GP to two lanes	2030
3186/VI4IRMPI	DAAR/I-495 Capital Beltway Interchange Flyover Ramp Relocation (Phase IV DAAR)	Construct flyover ramp from NB I-495 GP to Westbound (WB) DAAR	2030
3208/VI4IHOTB	I-495 Interchange Ramp Phase II, Ramp 3 DAAR	Construct Ramp from SB I-495 GP to WB DAAR	2030
3272/VI4IAUX19	I-495 Capital Beltway Auxiliary Lanes	Add NB I-495 GP auxiliary lane between on-ramp from WB Dulles Toll Road and off-ramp to Georgetown Pike	2030
3272/VI4IAUX20	I-495 Capital Beltway Auxiliary Lanes	Add Southbound (SB) I-495 GP auxiliary lane from Georgetown Pike on-ramp to WB Dulles Toll Road off-ramp	2030
1182/1186/3281	I-495 Managed Lanes / I-270 Managed Lanes in Maryland	Construct bi-directional Express lanes system on I-495 in Maryland between the ALMB and the Woodrow Wilson Bridge	2025
3060	Jones Branch Connector	Extend Jones branch Connector bridge to provide connection between Route 123 and I-495 Express Lanes	2020

ALMB = American Legion Memorial Bridge; DAAR = Dulles Airport Access Road; EB = Eastbound; GP = General Purpose; NB = Northbound; SB = Southbound; WB = Westbound  
 Source: NCRTPB, 2018

## 2.2.2 Build Alternative

The Build Alternative would consist of five elements described in further detail below: extending the existing I-495 Express Lanes, adding GP auxiliary lanes, adding access to the Express Lane network, improving two interchanges, and reconstruction of overpasses.

The main element of the Build Alternative is extending the existing four I-495 Express Lanes from their current terminus between the I-495/Route 267 interchange and the Old Dominion Drive overpass north approximately 1.6 miles to the George Washington Memorial Parkway (GW Parkway) interchange, at which point the Express Lanes would tie back into the Capital Beltway in the vicinity of the ALMB. Express

Lanes are designed to keep traffic flowing at 45 miles per hour or faster by dynamically adjusting tolls, allowing transit, trucks, high-occupancy, and toll-paying vehicles to have a much more reliable trip.

In order to reduce the limits of disturbance (LOD), the extended Express Lanes would be separated from the GP lanes by flexible post delineators (see **Figure 2-1**), consistent with the configuration of the existing I-495 Express Lanes, requiring approximately an additional four feet per direction in the overall typical section of the roadway (eight feet total). This eliminates the need to provide full shoulders and concrete barrier separation between the GP lanes and Express Lanes in each direction.



**Figure 2-1. Existing Flexible Post Delineators on I-495 Express Lanes**

Additional GP auxiliary lanes between the Route 267 and Route 193 interchanges are also proposed as part of the Build Alternative. North of the Route 193 interchange, an auxiliary lane is already provided in the northbound direction up to the GW Parkway; in the southbound direction, an existing collector-distributor (C-D) road would be replaced with an auxiliary lane. Through the entire project area, the Build Alternative would retain the existing number of GP lanes in each direction between the I-495/Route 267 interchange and the GW Parkway.

The Build Alternative also proposes to make improvements to the I-495 interchanges between Route 123 and GW Parkway, reconstruct the existing I-495 overpasses in the study area at Old Dominion Drive and Live Oak Drive, and provide additional access to the Express Lanes network. Each of these are described further in this section below.

Currently, 2-axle single-unit trucks and cars are permitted to use the existing express lanes on I-495, I-395, and I-95; trucks with 3 axles or more are not permitted in the current express lanes network within Virginia. To understand the implications of allowing trucks into the proposed Express Lanes, in the case of a VDOT policy change regarding permitted vehicles, the I-495 NEXT traffic, air quality, and noise analyses assumed 3+ axle trucks would be permitted to use the I-495 Express Lanes north of the Dulles Toll Road.

**Exhibits 2-1a** through **2-1e** at the end of this chapter provide a plan view of the Build Alternative. **Figure 2-2** shows the existing and proposed typical sections.

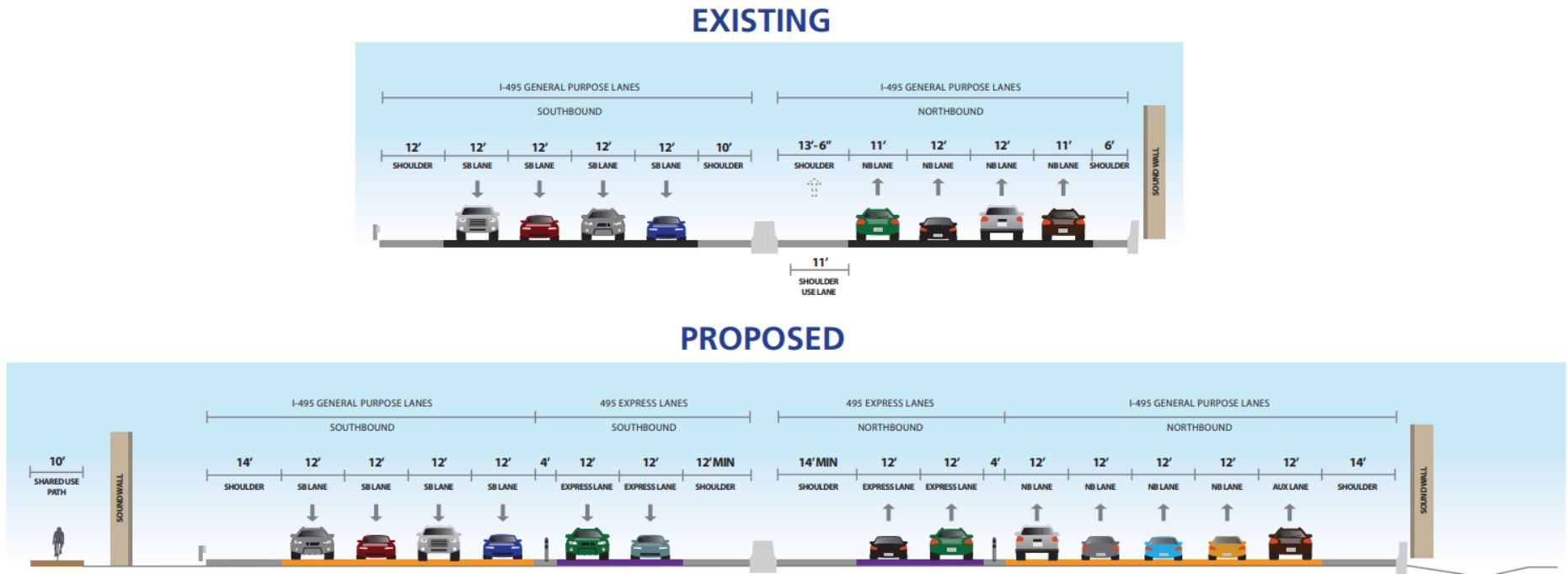


Figure 2-2. Existing and Build Alternative Typical Sections



**Proposed Access to the Express Lanes**

The Build Alternative would provide the following access to and from the Express Lanes:

Flyover exchange ramps to provide access from the northbound I-495 GP lanes to the northbound I-495 Express Lanes, and from the southbound I-495 Express Lanes to the southbound I-495 GP lanes. These exchange ramps would be located at the Route 267 interchange.

New Express Lanes access to and from Route 267:

- Eastbound Route 267 (Dulles Toll Road (DTR)) to northbound I-495 Express
- Westbound Route 267 (Dulles Connector Road (DCR)) to northbound I-495 Express
- Southbound I-495 Express to eastbound Route 267 (DCR). This movement would tie into an eastbound C-D road along Route 267 at the Route 267/Route 123 interchange, allowing access to both the eastbound Dulles Connector Road and Route 123.
- Note that the southbound I-495 Express to westbound Route 267 (DTR) movement is already provided today; additionally, the northbound I-495 Express to westbound Route 267 (DTR) and eastbound Route 267 (DTR) to southbound I-495 Express movements are also provided today.

New Express Lanes access to and from GW Parkway:

- Northbound I-495 Express to GW Parkway
- GW Parkway to southbound I-495 Express

Note that the Maryland Managed Lane project (assumed to be in place under No Build conditions) would provide access to the movements from GW Parkway to northbound I-495 Express and from southbound I-495 Express to GW Parkway.

**Other Roadway and Bicycle/Pedestrian Improvements**

The Build Alternative includes modifications to the I-495/Route 267 and I-495/GW Parkway interchange, including reconfiguration of several of the GP ramp connections. The Build Alternative also includes overpass reconstruction. Further details regarding the proposed improvements to the two interchanges and the overpass replacements can be found in the *I-495 Alternatives Development Technical Memo* (VDOT, 2020a).

In response to comments from the public received following the I-495 NEXT Design and Location Public Hearing held in October 2020, the configuration of the Georgetown Pike interchange was slightly modified. First, the right-turn movement from westbound Georgetown Pike to northbound I-495 was revised from a signal-controlled right-turn to a channelized free-flow right-turn with an additional acceleration and merge lane on the I-495 northbound on-ramp. The northbound on-ramp was revised to allow longer merge distances, and to provide two ramp merge lanes where the ramp joins with northbound I-495, and then taper down to one auxiliary lane between Georgetown Pike and the GW Parkway off-ramp. This revision should improve potential queuing in the right-turn lane on westbound Georgetown Pike as well as on the northbound on-ramp due to the merge condition.

The typical section of the Georgetown Pike bridge over I-495 was also modified. The original concept proposed a 99-foot wide bridge that included a 10-foot wide shared use path on the south side of the bridge, adjacent to the eastbound lanes of Georgetown Pike. The shared use path would be separated from the

vehicular travel lanes by a concrete barrier and railing. The original bridge section did not include pedestrian or bicycle facilities on the north side of the bridge. The revised design proposes to widen the bridge by 6.5 feet to 105.5 feet in order to supplement the shared use path on the south side of the bridge with a 6-foot wide sidewalk at the back of curb on the north side of the bridge. At the request of the Fairfax County Park Authority, a new trail segment was added in the northwest quadrant of the interchange between the southbound off-ramp and Linganore Road, in order to connect the proposed north side sidewalk with the existing trail between Linganore Road and the Scotts Run Nature Preserve entrance. These proposed changes, which increased the width of the bridge and provide a connection to the existing trail at Linganore Road, are contained within the LOD. Exhibit 2-1 at the end of this chapter reflects the modifications described above, and was updated in January 2021 to respond to agency and public comments regarding the Georgetown Pike interchange and surrounding infrastructure.

The Build Alternative includes an approximately 3.1-mile, 10-foot-wide shared use path, consistent with the *Fairfax County Countywide Trails Plan Map* (Fairfax County Department of Planning and Development, 2018) (see **Figure 2-3**). The path is proposed to begin near the south end of the project corridor at Timberly Lane near Lewinsville Road and continue north along the west side of I-495 behind the proposed noise barrier. The path would continue underneath Old Dominion Drive with a spur in the southeast quadrant of the grade separation to access Old Dominion Drive near Dominion Court. The path would also have a spur to the existing Helga Place/Linganore Drive intersection just west of the Georgetown Pike interchange. The path is proposed to then cross I-495 on the south side of the proposed Georgetown Pike bridge and turn north at the Balls Hill Road intersection. The path would then continue along the west side of Balls Hill Road to the GW Parkway interchange where it may connect in the future to a proposed pedestrian crossing of the Potomac River adjacent to the ALMB. This potential future extension of the proposed path north of the GW Parkway interchange would be a separate action associated with potential future improvements to I-495 currently proposed by the Maryland Department of Transportation and would require extensive coordination and completion of agreements between NPS, VDOT, and the Maryland Department of Transportation prior to construction. The path would also provide access to the existing sidewalk on Live Oak Drive which crosses I-495 just south of the GW Parkway interchange. Logical sections between interim termini of this path would be available for use as they are opened. Passage beyond Live Oak Drive may be prohibited until the connection to the shared use path along the ALMB is complete.

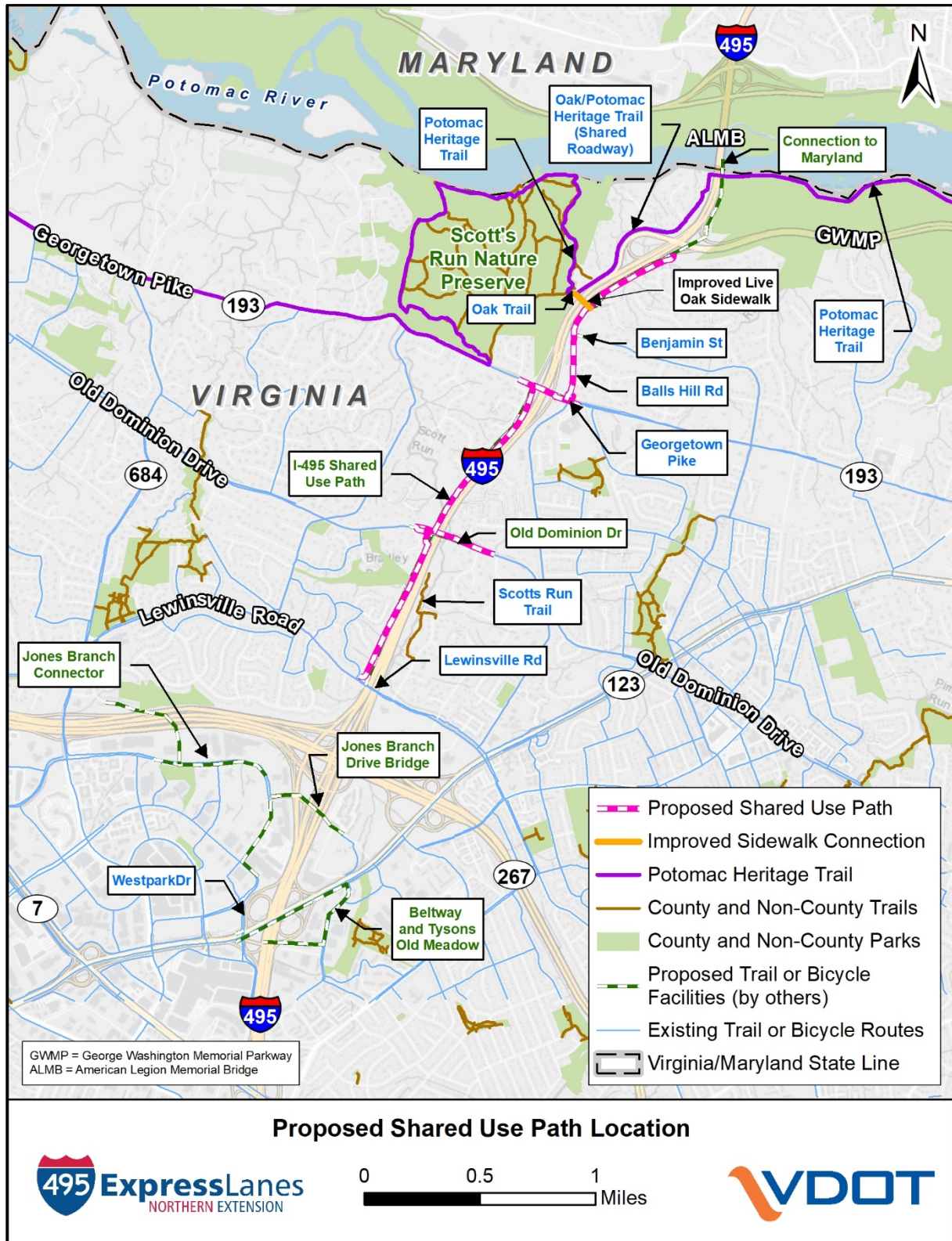


Figure 2-3. Proposed Shared Use Path Location

## 2.3 ABILITY OF ALTERNATIVES TO MEET PURPOSE AND NEED

As documented in **Chapter 1**, the purpose for the project is based on the following primary need elements: reduce congestion, provide additional travel choices and improve travel reliability.

### 2.3.1 Ability of the No Build Alternative to Address the Purpose and Need

As discussed in the *I-495 Traffic and Transportation Technical Report* (VDOT, 2020d), I-495 within the study area is a severely oversaturated network during the weekday AM and PM peak periods. The duration and extent of congestion within the study area is expected to increase with population, employment, and subsequent traffic volumes. Variability in travel speeds and travel times is therefore expected to worsen in the future. Routine maintenance and construction of projects programmed in the 2045 CLRP would not reduce congestion, provide new travel choices, or improve travel reliability along I-495 within the project's study area. Therefore, the No Build Alternative would not address the purpose and need for the project as identified in **Chapter 1**.

### 2.3.2 Ability of the Build Alternative to Address the Purpose and Need

The following sections describe how the Build Alternative would meet the purpose and need, detailed further in the *I-495 Traffic and Transportation Technical Report* (VDOT, 2020d).

#### *Reduce Congestion*

The Build Alternative is anticipated to reduce congestion compared with the Existing and 2045 No Build scenarios in three ways as outlined below: optimizing traffic volumes and travel demand, improving traffic operations, and increasing the number of persons moved.

#### Optimizing Traffic Volumes and Travel Demand

Daily traffic volume projections were modeled along I-495 under Existing Conditions and the 2045 No Build and Build scenarios (**Table 2-2**). Total two-way daily volumes are forecasted to increase from the No Build to Build scenarios by approximately 2.5% across the ALMB to as much as 8% between Route 267 and Route 193, where the existing Express Lanes network currently terminates. Notably, in the segments north of Route 267 where the Express Lanes do not currently exist, forecasted volumes in the GP lanes show a slight decrease in the Build scenario as compared to the No Build scenario, as more trips shift to use the Express Lanes, which would be priced to ensure free-flow operations. This reduction in the GP lanes demand would consequently improve future congestion on these lanes.



**Table 2-2. 2045 Forecasted Daily Traffic Volumes Along I-495**

Location		Existing (2018)			2045 No Build			2045 Build		
		GP	Express	Total Volume	GP	Express	Total Volume	GP	Express	Total Volume
South of Route 123	NB	78,250	14,705	198,655	96,800	23,200	260,700	99,800	24,100	267,600
	SB	89,465	16,235		114,000	26,700		115,900	27,800	
Between Route 123 and Route 267	NB	69,565	15,115	183,150	90,600	24,400	250,500	95,400	25,600	259,400
	SB	83,485	14,985		110,200	25,300		112,200	26,200	
Between Route 267 and Route 193	NB	84,560	11,820	209,915	115,300	19,600	286,400	113,100	39,100	315,500
	SB	103,900	9,635		132,300	19,200		125,600	37,700	
Between Route 193 and GW Parkway	NB	104,915	-	224,795	139,100	-	293,100	110,900	39,100	316,100
	SB	119,880	-		154,000	-		128,400	37,700	
North of GW Parkway (ALMB)	NB	123,190	-	253,270	136,800	29,200	341,600	126,100	46,600	356,200
	SB	130,080	-		144,200	31,400		136,100	47,400	

Northbound = NB; Southbound = SB; GP = General Purpose Lanes; Express = Express Lanes

### Improving Traffic Operations

In addition to the increased vehicular traffic volumes for the overall corridor, this project is also anticipated to increase travel speeds and reduce travel times in the study area. The following summarize these improvements to traffic operations under the Build Alternative:

**AM Peak Period: General Purpose Lanes**—Under 2045 Build conditions, travel times along the northbound I-495 GP lanes between Route 123 and the ALMB decrease by approximately four minutes when compared to 2045 No Build conditions. Similarly, travel times along southbound I-495 GP lanes between the ALMB and Route 123 decrease by approximately four minutes when compared to 2045 No Build Conditions.

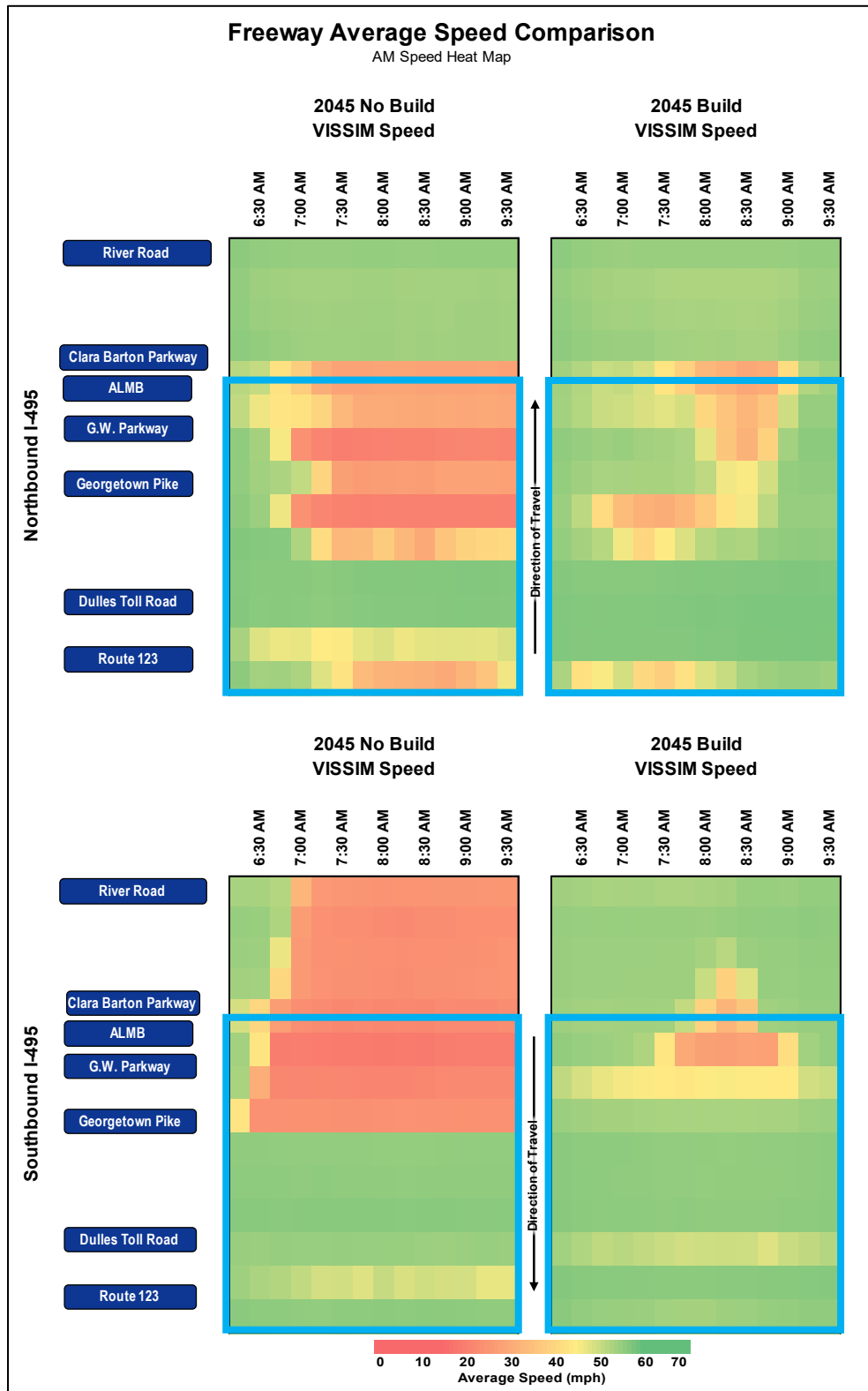
**AM Peak Period: Express Lanes**—Under 2045 Build conditions travel times on northbound I-495 Express Lanes under the Build condition decrease by approximately four minutes between Westpark Drive and the ALMB when compared to the No Build condition, in which the GP lanes must be used between just north of Route 267 and just south of the GW Parkway. Similarly, travel times on southbound I-495 Express Lanes under the Build condition decrease by approximately two minutes between the ALMB and Westpark Drive compared to the No Build condition. In the No Build condition, no Express Lanes exist between Route 267 and the ALMB, forcing all trips to utilize the congested GP lanes. In the Build condition, the continuous Express Lanes system operates at the posted speed limit, providing a reliable end-to-end travel time in both directions.

**PM Peak Period: General Purpose Lanes**—Under 2045 Build conditions, travel times along the northbound I-495 GP lanes between Route 123 and the ALMB decrease by approximately five minutes when compared to 2045 No Build conditions. Travel times along southbound I-495 GP lanes between the ALMB and Route 123 remain generally consistent compared to 2045 No Build Conditions.



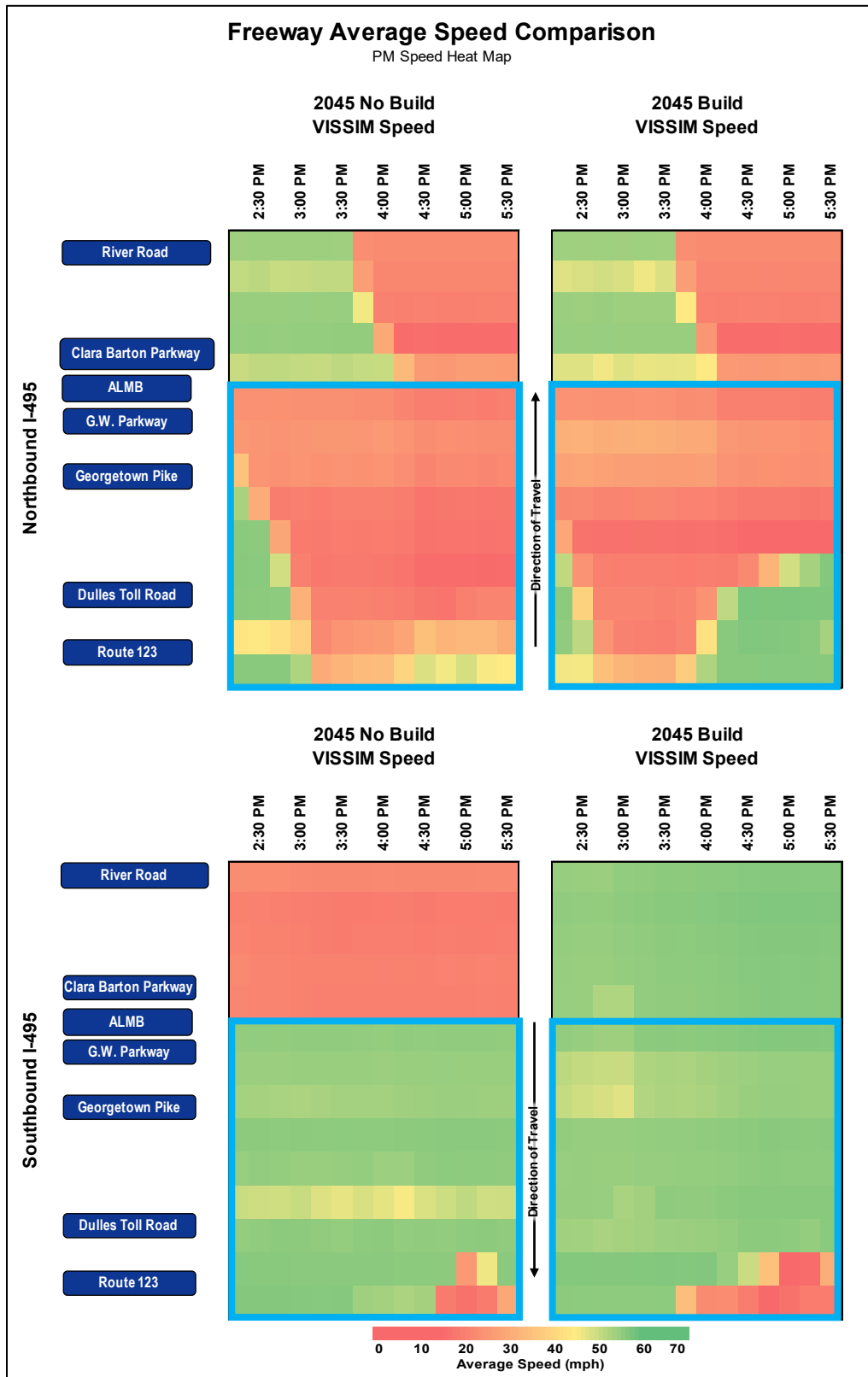
**PM Peak Period: Express Lanes**—Under 2045 Build conditions, travel times on northbound I-495 Express Lanes under the Build condition decrease by approximately 10 minutes between Westpark Drive and the ALMB as compared to the No Build condition. Travel times on southbound I-495 Express Lanes between the ALMB and Westpark Drive decrease by approximately one minute compared to the No Build condition. In the No Build condition, no Express Lanes exist between Route 267 and the ALMB, forcing all trips to utilize the congested GP lanes. In the Build condition, the continuous Express Lanes system operates at the posted speed limit, providing a reliable end-to-end travel time in both directions.

**Figure 2-4** provides a “heat map” comparison of average speeds between 2045 No Build and Build conditions for the AM peak period along the I-495 GP lanes. **Figure 2-5** provides this same comparison but for the PM peak period. Time of day during the peak period is provided on the horizontal axis while location along the corridor is provided along the vertical axis; the colors signify average speeds for each scenario with red being the lowest speeds (0 mph) and green being the highest speeds (70 mph). The figures are consistent with the noted travel time savings and indicate a greater presence of congestion in the No Build scenario in both directions of the I-495 GP lanes during the PM peak period.



Note: Blue area represents EA study area.

Figure 2-4: 2045 No Build and Build – AM Peak Period Average Speeds, I-495 GP Lanes



Note: Blue area represents EA study area.

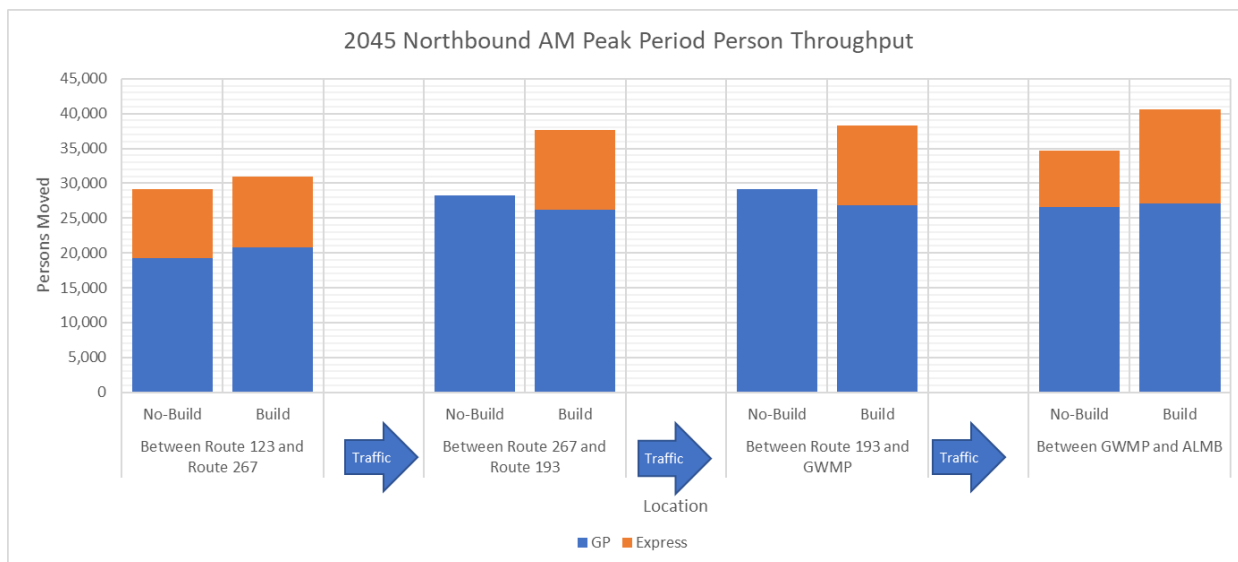
Figure 2-5: 2045 No Build and Build – PM Peak Period Average Speeds, I-495 GP Lanes

**Increasing the Number of Persons Moved**

Average vehicle occupancy rates for Express Lanes facilities in Northern Virginia (1.44 persons per vehicle) are higher than GP lanes (1.1 persons per vehicle). Because future volumes are anticipated to shift from the GP lanes to the proposed Express Lanes as a result of the Build Alternative, the total number of persons moved through the study area would increase. See Chapter 7 of the *I-495 Traffic and Transportation Technical Report* (VDOT, 2020d) for more detailed information. **Figure 2-6** and **Figure 2-7** compare 2045 No Build versus Build AM peak period person throughput along I-495 northbound and southbound, respectively (GP and Express combined). These figures show that the number of persons moved increases in the Build scenario across the length of the I-495 corridor in both directions due to the added capacity from the Express Lanes and increased occupancy of vehicles in those lanes.

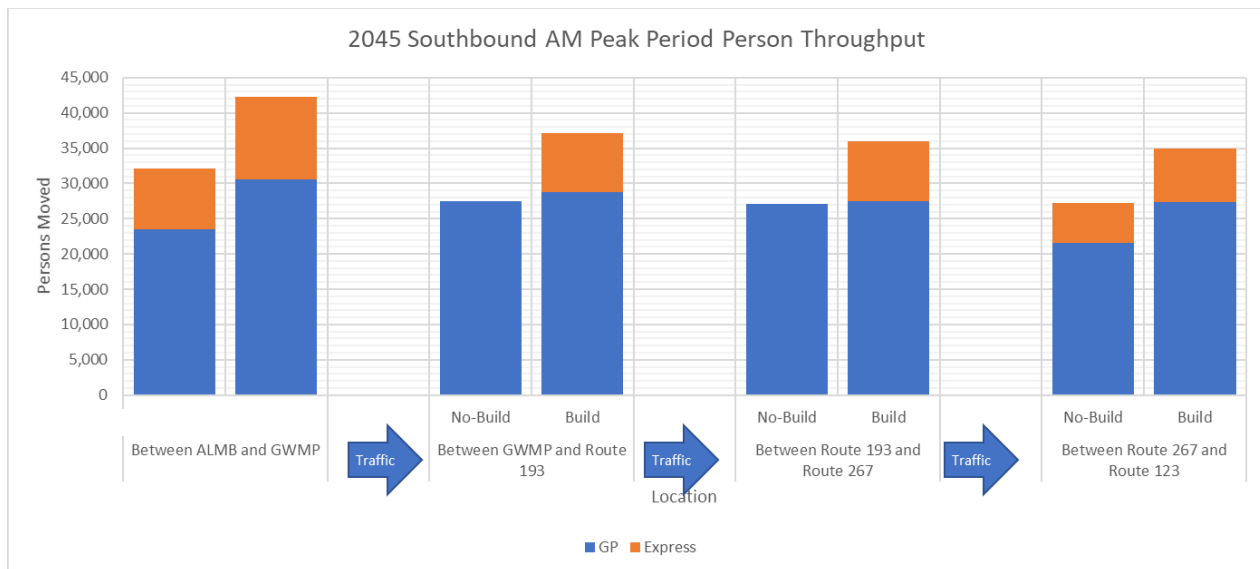
In the northbound direction, the highest person throughputs are across the ALMB. Increases in throughput from No Build to Build range from 6% to 33%, with the greatest increase in the segments between Route 267 and GW Parkway where the new Express Lanes add capacity.

In the southbound direction, the highest person throughputs are again across the ALMB. Increases in throughput from No Build to Build range from 29% to 35%, with the greatest increases again in the segments between GW Parkway and Route 267 where the new Express Lanes add capacity. Note that the southbound throughput in the No Build scenario is heavily constrained due to the merge with the southbound Maryland Managed Lane project terminus; this reduces throughput along the length of the corridor.



**Figure 2-6. 2045 No Build and Build – AM Peak Period Person Throughput, I-495 Northbound<sup>1</sup>**

<sup>1</sup> These figures show the estimated number of persons moved across a three-hour period based on simulated vehicle throughput and assumed vehicle occupancies for GP and Express Lanes. More information on assumed vehicle occupancies can be found in the associated *I-495 Traffic and Transportation Technical Report* (VDOT, 2020d).



**Figure 2-7. 2045 No Build and Build – AM Peak Period Person Throughput, I-495 Southbound<sup>2</sup>**

**Figure 2-8** and **Figure 2-9** compare 2045 No Build versus Build PM peak period person throughput along I-495 northbound and southbound, respectively (GP and Express combined). These figures again show that person throughput increases in the Build scenario across the length of the I-495 corridor in both directions due to the added capacity from the Express Lanes and increased occupancy of vehicles in those lanes.

In the northbound direction, the highest person throughputs are across the ALMB. Increases in throughput from No Build to Build range from 10% to 35%, with the greatest increase in the segments between Route 267 and GW Parkway where the new Express Lanes add capacity.

In the southbound direction, the highest person throughputs are again across the ALMB. Increases in throughput from No Build to Build range from 16% to 32%, with the greatest increases again in the segments between GW Parkway and Route 267 where the new Express Lanes add capacity.

The same throughput analysis was conducted for the AM Peak Period as well. This analysis indicated that the AM Peak Period would experience similar increases in throughput from the No Build to the Build scenario ranging from 6% to 33% in the northbound direction and 29% to 35% in the southbound direction. Again, the segments between GW Parkway and Route 267 experienced the greatest increases in throughput where the Express Lanes add capacity.

<sup>2</sup> These figures show the estimated number of persons moved across a three-hour period based on simulated vehicle throughput and assumed vehicle occupancies for GP and Express Lanes. More information on assumed vehicle occupancies can be found in the associated *I-495 Traffic and Transportation Technical Report* (VDOT, 2020d).

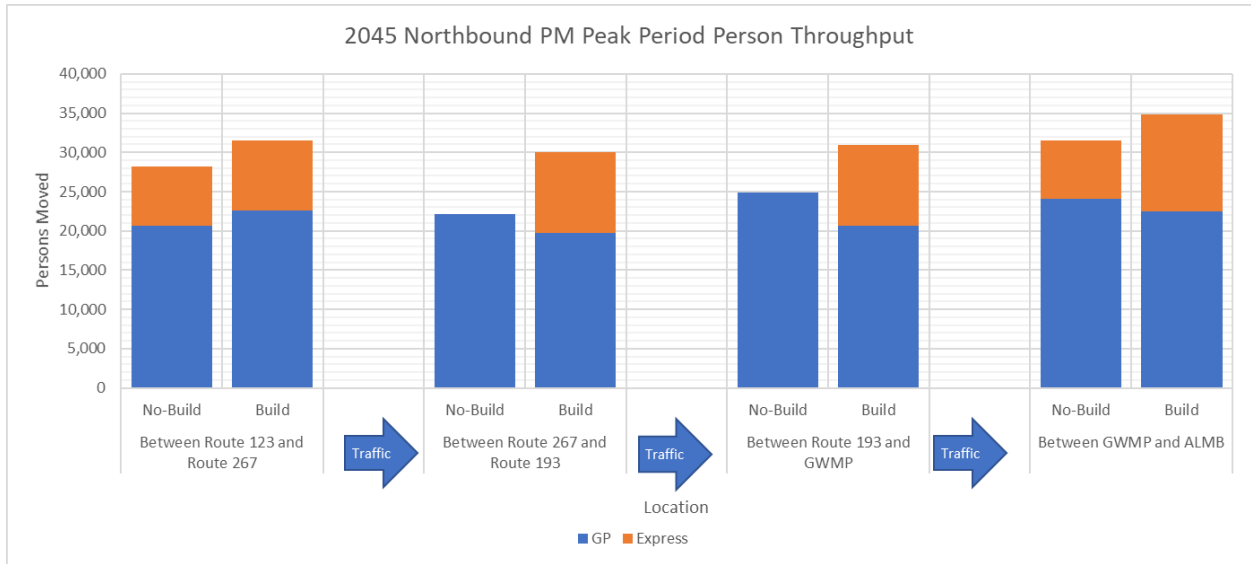


Figure 2-8. 2045 No Build and Build – PM Peak Period Person Throughput, I-495 Northbound<sup>3</sup>

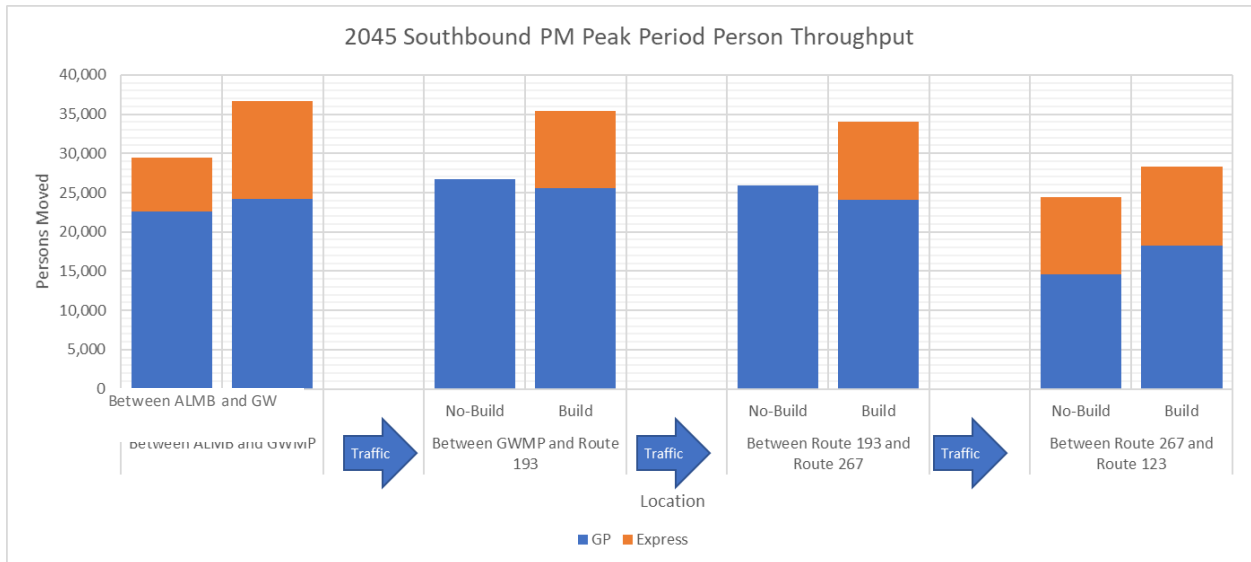


Figure 2-9. 2045 No Build and Build – PM Peak Period Person Throughput, I-495 Southbound<sup>3</sup>

<sup>3</sup> These figures show the estimated number of persons moved across a three-hour period based on simulated vehicle throughput and assumed vehicle occupancies for GP and Express Lanes. More information on assumed vehicle occupancies can be found in the associated *I-495 Traffic and Transportation Technical Report* (VDOT, 2020d).



***Provide Additional Travel Choices***

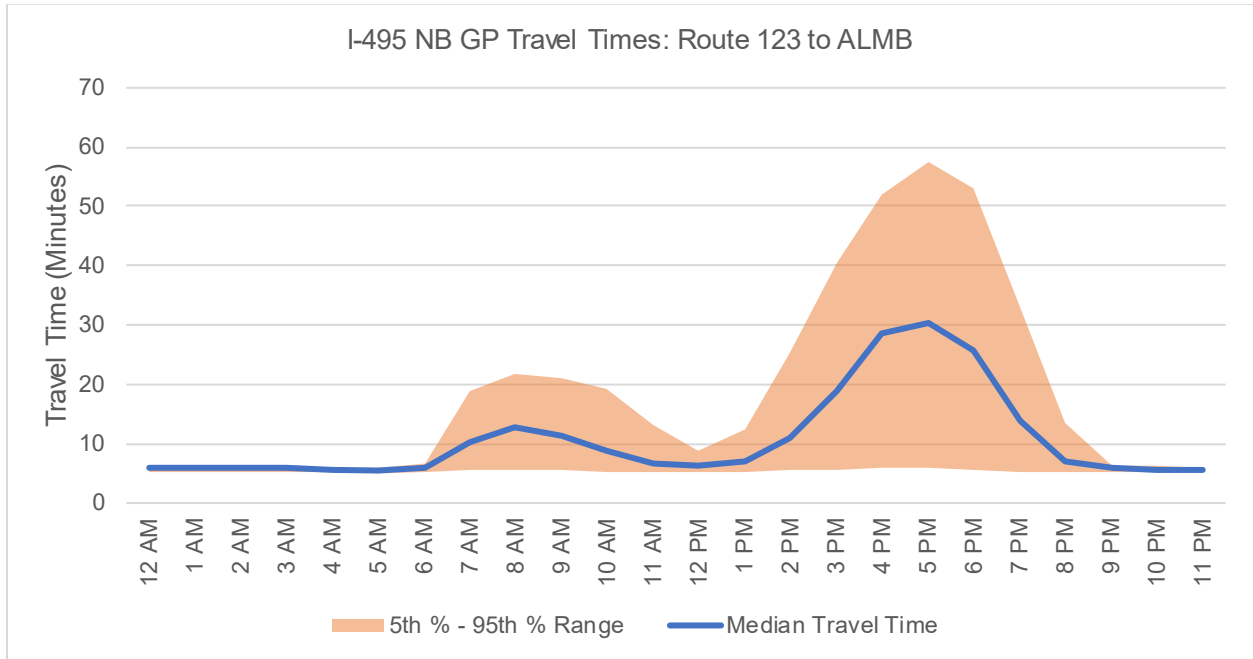
As noted in Chapter 4 of the *I-495 Traffic and Transportation Technical Report* (VDOT, 2020d), along the existing I-495 Express Lanes through Tysons, approximately 18% of vehicles are high-occupancy vehicles with three or more people (HOV-3) during the peak travel periods. This translates to an estimated 1.44 persons/vehicle across the Express Lanes during peak periods, as compared to an estimated 1.1 persons/vehicle observed on non-high-occupancy vehicle (HOV) interstate facilities in northern Virginia. The Express Lanes thus provide an alternative travel option for HOV vehicles and van pools or those wishing to pay a toll, and these options are shown to be utilized when provided. Additionally, as noted in Chapter 3 of the *I-495 Traffic and Transportation Technical Report* (VDOT, 2020d), no regional bus transit service is currently offered along I-495 through the study area and across the ALMB, in part due to the absence of dedicated or managed lanes that would allow buses to travel more efficiently. A seamless Express Lane system within Northern Virginia, to the final Capital Beltway exit in Virginia, would allow for the running of potential future transit service with reliable travel times.

Further, the proposed shared use path would provide a new multimodal travel option for local trips that is not currently provided under the existing condition and would not be provided by an extension of the Express Lanes alone. The proposed shared use path would improve travel choice in the study area by providing a bicycle and pedestrian option for local travelers.

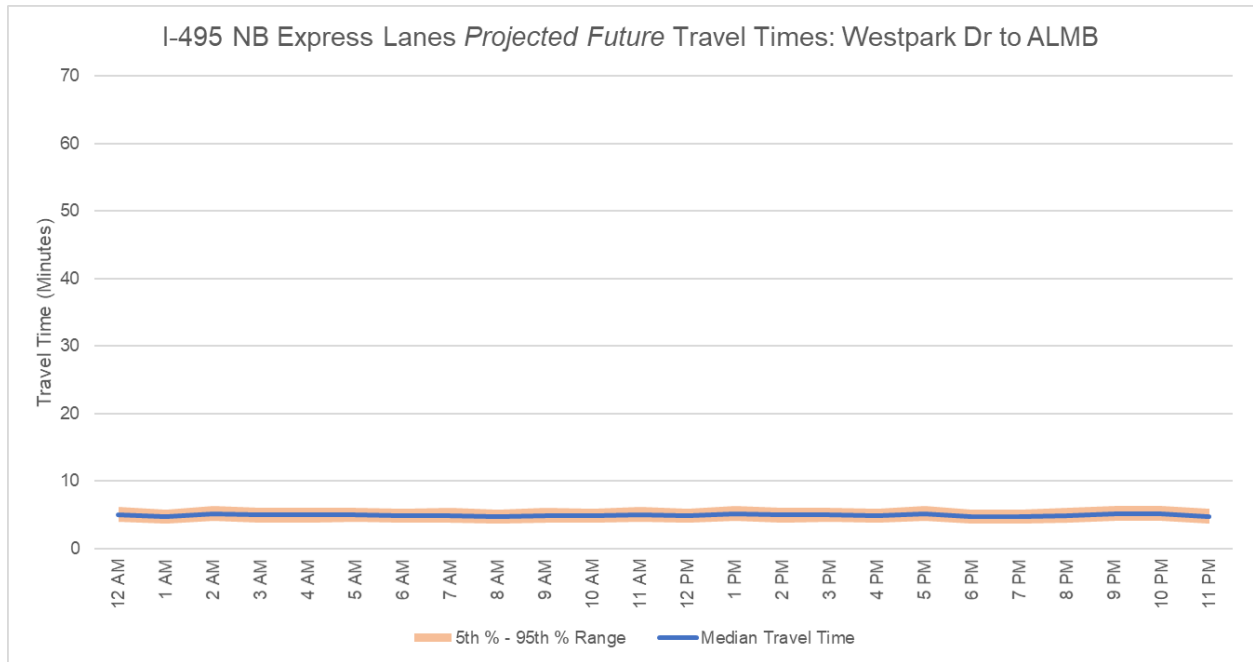
***Improve Travel Time Reliability***

The I-495 Express Lanes would offer consistent and predictable travel times for all roadway users including HOV motorists and transit buses. Although congestion would still exist during peak hours in the GP lanes, overall travel speeds would increase, and travel times would decrease compared to the No Build Alternative. The Commonwealth of Virginia Secretary of Transportation's recent commitment to providing transit between Virginia and Maryland across the ALMB is a reasonably foreseeable future action. This commitment is detailed in a letter from the Secretary to the Fairfax County Board of Supervisors on November 30, 2020 expressing the Commonwealth's intent to include future transit service as part of the overall I-495 corridor operations, under a separate project. (see Appendix D). Reference the *I-495 NEXT Indirect and Cumulative Effects Technical Report* (VDOT, 2021b) for more information on this reasonably foreseeable improvement.

**Figure 2-10** shows the current range of travel times experienced by drivers on I-495 northbound between Route 123 and the ALMB as observed during a single year between July 2017 and June 2018. During the morning rush hour, the travel times over the course of the year of observation ranged from around five minutes to more than twenty minutes, a difference of about 15 minutes. Likewise, the observed travel times over the course of the year during the evening rush hour ranged between about five minutes and almost sixty minutes, a range of almost fifty-five minutes. For comparison, the travel times for the same segments of roadway on the proposed Express Lanes were projected for the 2045 Build scenario shown in **Figure 2-11**. These results indicated that the travel time would remain at about five minutes throughout the entire day and over the course of a year. This shows that not only would the expected travel time for drivers of the Express Lanes decrease as compared to the No Build scenario, but the range of the observed travel times would also reduce to a very small margin. The range of travel times represents the reliability of a roadway to provide efficient transportation to users. When the range, or difference in expected travel times decreases, the reliability of that roadway can be said to increase or improve.



**Figure 2-10: I-495 Northbound GP Travel Times Observed between July 2017 and June 2018 from Route 123 to ALMB**



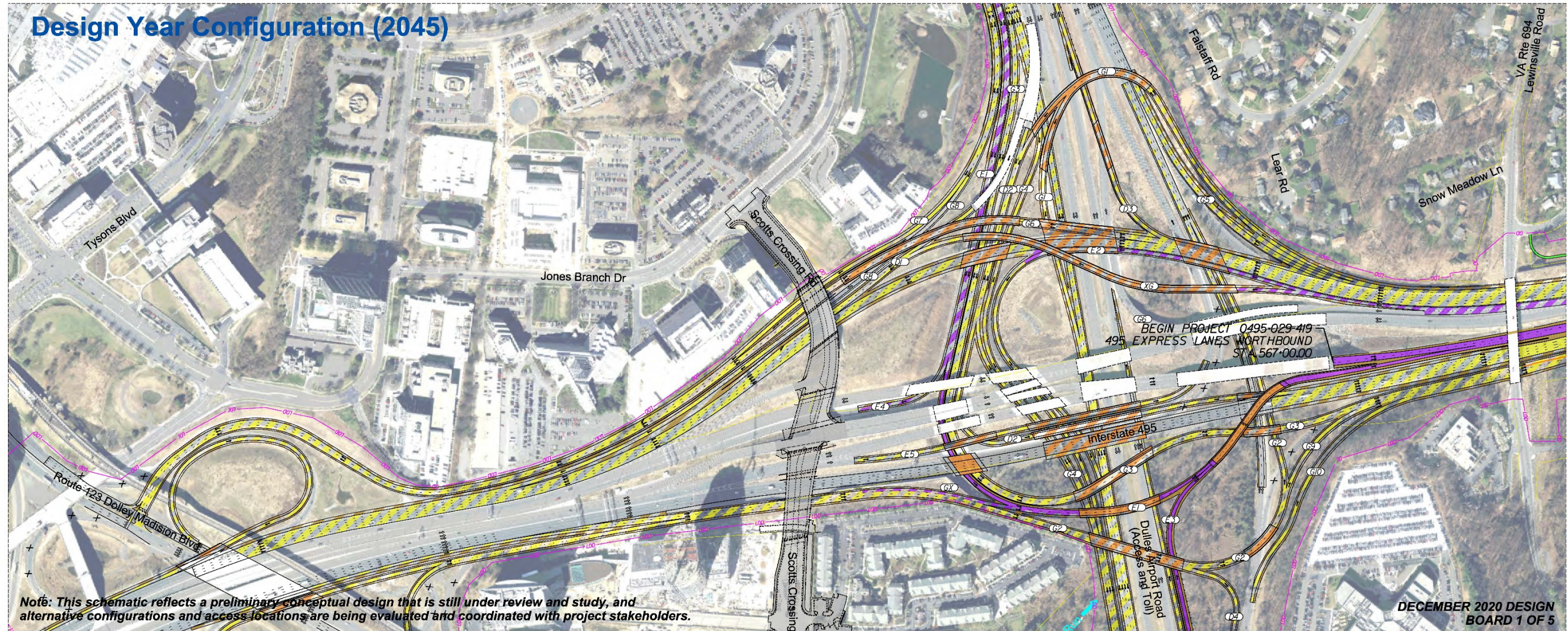
**Figure 2-11: I-495 Northbound Express Lanes Projected Future Travel Times in 2045 from Westpark Drive to AMLB**





# I-495 Express Lanes Northern Extension Study

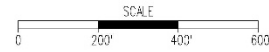
## Location and Design Public Hearing Update - January 2021



Project Location

North Arrow & Scale

Legend



- |   |   |                                       |   |                          |  |                                |
|---|---|---------------------------------------|---|--------------------------|--|--------------------------------|
| Proposed Express Lanes and Ramps            | Potential Future Express Lanes and Ramps By Others            | Proposed Paved Shoulder/Raised Median | Potential Future Paved Shoulder/Raised Median By Others | Proposed Shared Use Path | Potential Future Shared Use Path By Others | Existing Right of Way          |
| Proposed General Purpose Lanes Improvements | Potential Future General Purpose Lanes Improvements By Others | Proposed Bridge                       | Potential Future Bridge By Others                       | Signal                   | Proposed Noise Barrier                     | Proposed Limits of Disturbance |

I-495 Express Lanes Northern Extension Study - Fairfax County, Virginia - State Project 0495-029-419, P101, R201, C501 - UPC 113414 - Federal Project NHPP-495-5(095)  
These plans are unfinished and unapproved and are not to be used for any type of construction or the acquisition of right of way. Additional easements may be required beyond the proposed right of way shown on these plans. Imagery Courtesy of the Commonwealth of Virginia, Copyright 2020.

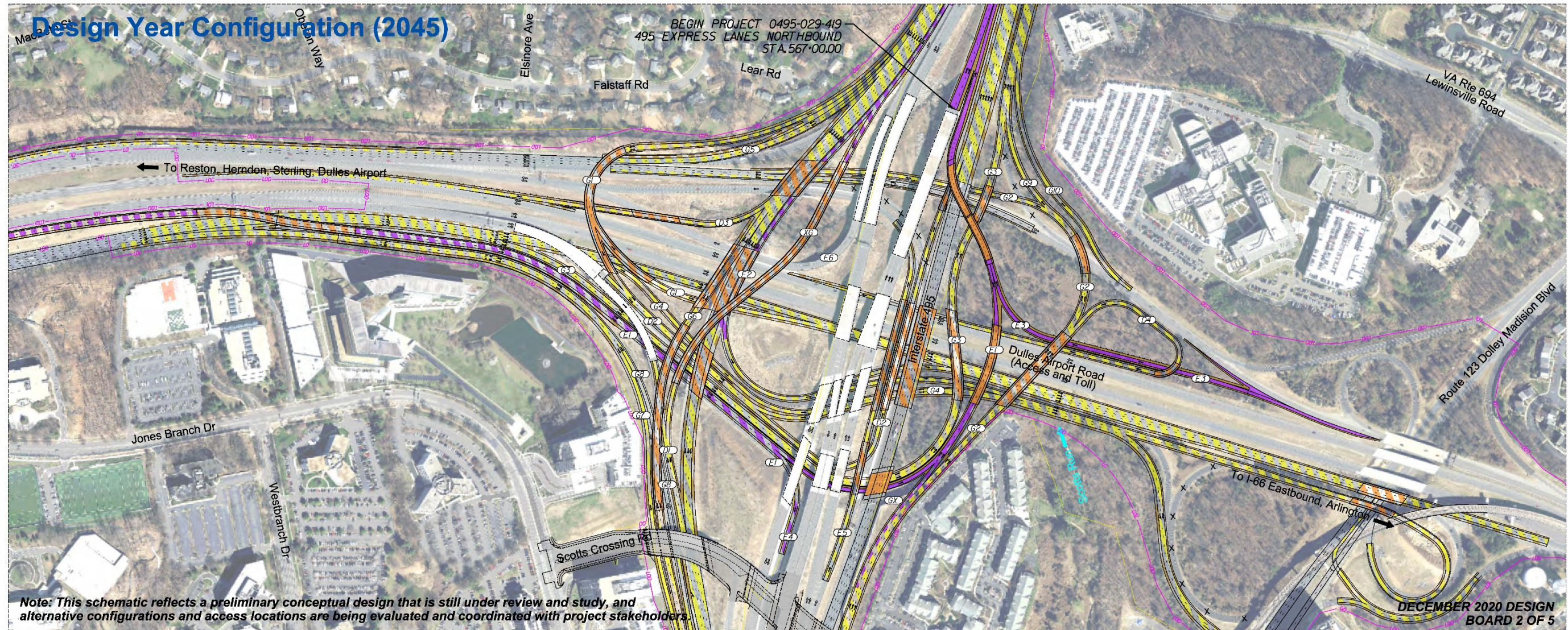
Exhibit 2-1a. Build Alternative Ultimate Configuration Improvements Concept Design (Sheet 1 of 5)





# I-495 Express Lanes Northern Extension Study

## Location and Design Public Hearing Update - January 2021



Project Location

North Arrow & Scale

Legend



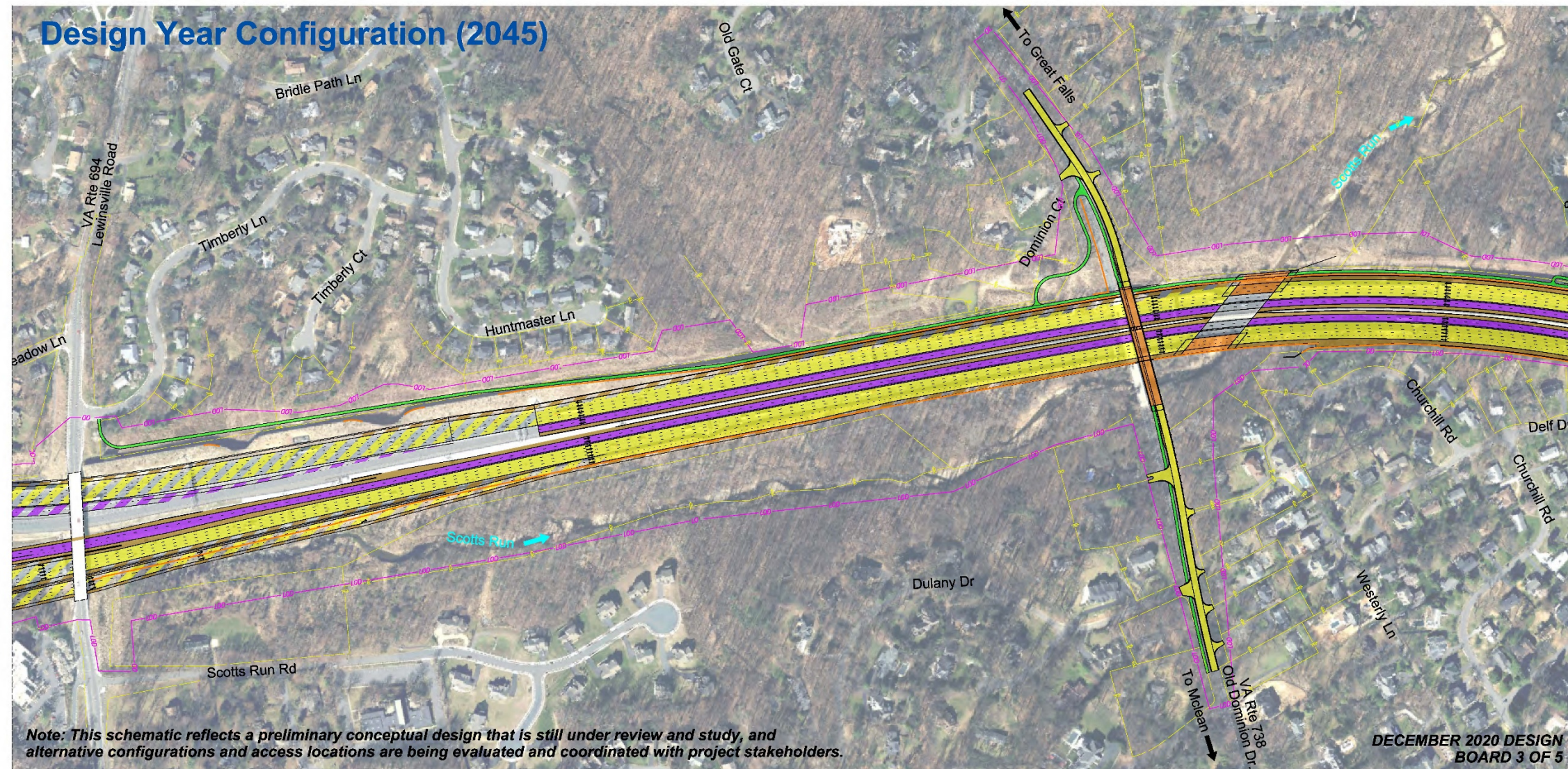
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| Proposed Express Lanes and Ramps            | Potential Future Express Lanes and Ramps By Others            | Proposed Paved Shoulder/Raised Median | Potential Future Paved Shoulder/Raised Median By Others | Proposed Shared Use Path | Potential Future Shared Use Path By Others | Existing Right of Way          |
| Proposed General Purpose Lanes Improvements | Potential Future General Purpose Lanes Improvements By Others | Proposed Bridge                       | Potential Future Bridge By Others                       | Signal                   | Proposed Noise Barrier                     | Proposed Limits of Disturbance |

I-495 Express Lanes Northern Extension Study - Fairfax County, Virginia - State Project 0495-029-419, P101, R201, C501 - UPC 113414 - Federal Project NHPP-495-5(095)  
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Exhibit 2-1b. Build Alternative Ultimate Configuration Concept Design (Sheet 2 of 5)



**VDOT** Virginia Department of Transportation  
**I-495 Express Lanes Northern Extension Study**  
 Location and Design Public Hearing Update - January 2021



<p>Project Location</p>	<p>North Arrow &amp; Scale</p>	<p>Legend</p> <table border="0"> <tr> <td> Proposed Express Lanes and Ramps</td> <td> Potential Future Express Lanes and Ramps By Others</td> <td> Proposed Paved Shoulder/Raised Median</td> <td> Potential Future Paved Shoulder/Raised Median By Others</td> <td> Proposed Shared Use Path</td> <td> Potential Future Shared Use Path By Others</td> <td> Existing Right of Way</td> </tr> <tr> <td> Proposed General Purpose Lanes Improvements</td> <td> Potential Future General Purpose Lanes Improvements By Others</td> <td> Proposed Bridge</td> <td> Potential Future Bridge By Others</td> <td> Signal</td> <td> Proposed Noise Barrier</td> <td> Proposed Limits of Disturbance</td> </tr> </table>				Proposed Express Lanes and Ramps	Potential Future Express Lanes and Ramps By Others	Proposed Paved Shoulder/Raised Median	Potential Future Paved Shoulder/Raised Median By Others	Proposed Shared Use Path	Potential Future Shared Use Path By Others	Existing Right of Way	Proposed General Purpose Lanes Improvements	Potential Future General Purpose Lanes Improvements By Others	Proposed Bridge	Potential Future Bridge By Others	Signal	Proposed Noise Barrier	Proposed Limits of Disturbance
Proposed Express Lanes and Ramps	Potential Future Express Lanes and Ramps By Others	Proposed Paved Shoulder/Raised Median	Potential Future Paved Shoulder/Raised Median By Others	Proposed Shared Use Path	Potential Future Shared Use Path By Others	Existing Right of Way													
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I-495 Express Lanes Northern Extension Study - Fairfax County, Virginia - State Project 0495-029-419, P101, R201, C501 - UPC 113414 - Federal Project NHPP-495-5(095)  
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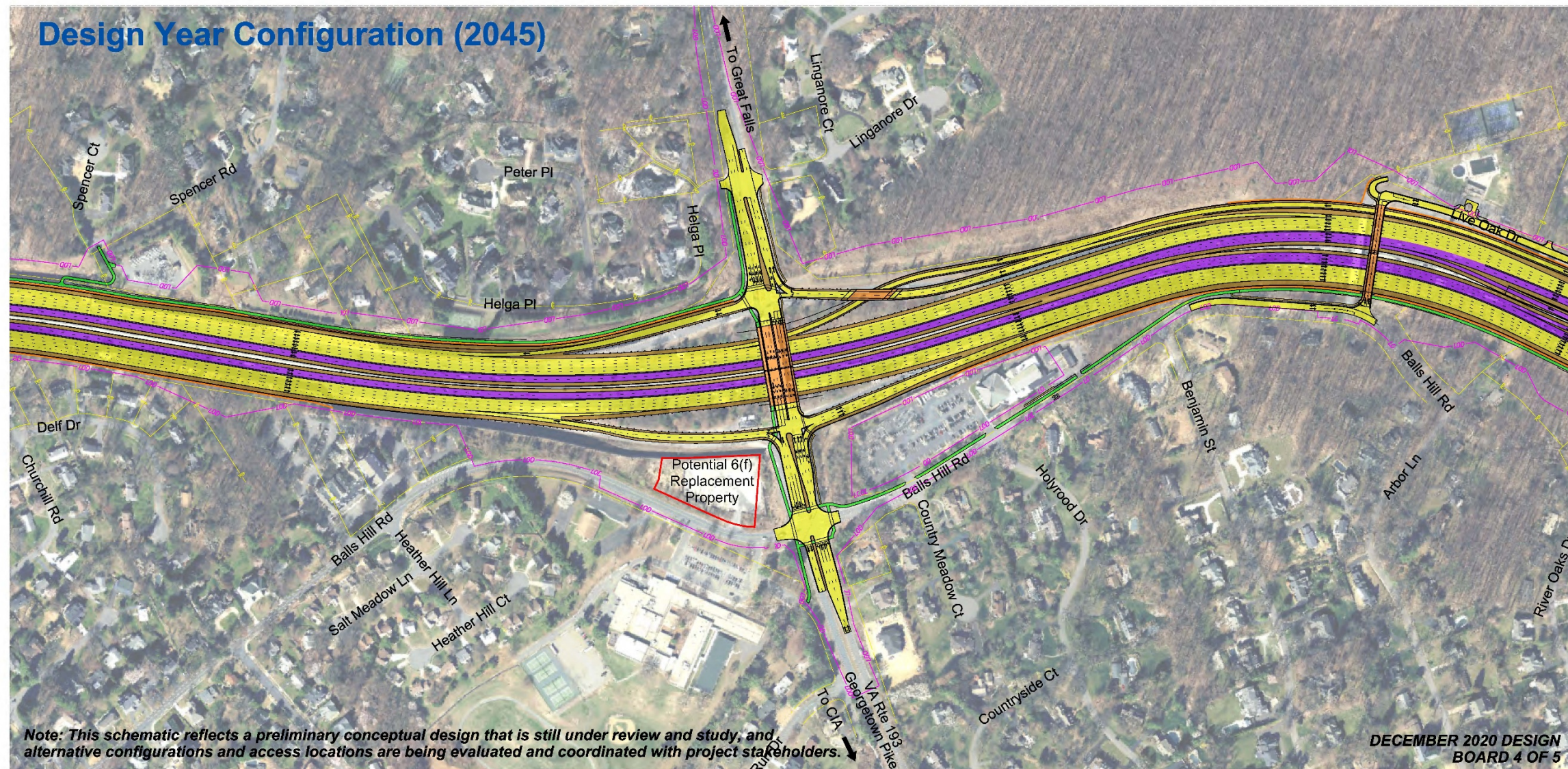
**Exhibit 2-1c. Build Alternative Ultimate Configuration Concept Design (Sheet 3 of 5)**





# I-495 Express Lanes Northern Extension Study

## Location and Design Public Hearing Update - January 2021



**Note:** This schematic reflects a preliminary conceptual design that is still under review and study, and alternative configurations and access locations are being evaluated and coordinated with project stakeholders.

DECEMBER 2020 DESIGN BOARD 4 OF 5

<p>Project Location</p>	<p>North Arrow &amp; Scale</p>	<p>Legend</p> <table border="0"> <tr> <td> Proposed Express Lanes and Ramps</td> <td> Potential Future Express Lanes and Ramps By Others</td> <td> Proposed Paved Shoulder/Raised Median</td> <td> Potential Future Paved Shoulder/Raised Median By Others</td> <td> Proposed Shared Use Path</td> <td> Potential Future Shared Use Path By Others</td> <td> Existing Right of Way</td> </tr> <tr> <td> Proposed General Purpose Lanes Improvements</td> <td> Potential Future General Purpose Lanes Improvements By Others</td> <td> Proposed Bridge</td> <td> Potential Future Bridge By Others</td> <td> Signal</td> <td> Proposed Noise Barrier</td> <td> Proposed Limits of Disturbance</td> </tr> </table>	Proposed Express Lanes and Ramps	Potential Future Express Lanes and Ramps By Others	Proposed Paved Shoulder/Raised Median	Potential Future Paved Shoulder/Raised Median By Others	Proposed Shared Use Path	Potential Future Shared Use Path By Others	Existing Right of Way	Proposed General Purpose Lanes Improvements	Potential Future General Purpose Lanes Improvements By Others	Proposed Bridge	Potential Future Bridge By Others	Signal	Proposed Noise Barrier	Proposed Limits of Disturbance
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Proposed General Purpose Lanes Improvements	Potential Future General Purpose Lanes Improvements By Others	Proposed Bridge	Potential Future Bridge By Others	Signal	Proposed Noise Barrier	Proposed Limits of Disturbance										

I-495 Express Lanes Northern Extension Study - Fairfax County, Virginia - State Project 6495-029-419, P101, R201, C501 - UPC 113414 - Federal Project NHPP-495-5(095)  
These plans are unfinished and unapproved and are not to be used for any type of construction or the acquisition of right of way. Additional easements may be required beyond the proposed right-of-way shown on these plans. Imagery Courtesy of the Commonwealth of Virginia, Copyright 2020.

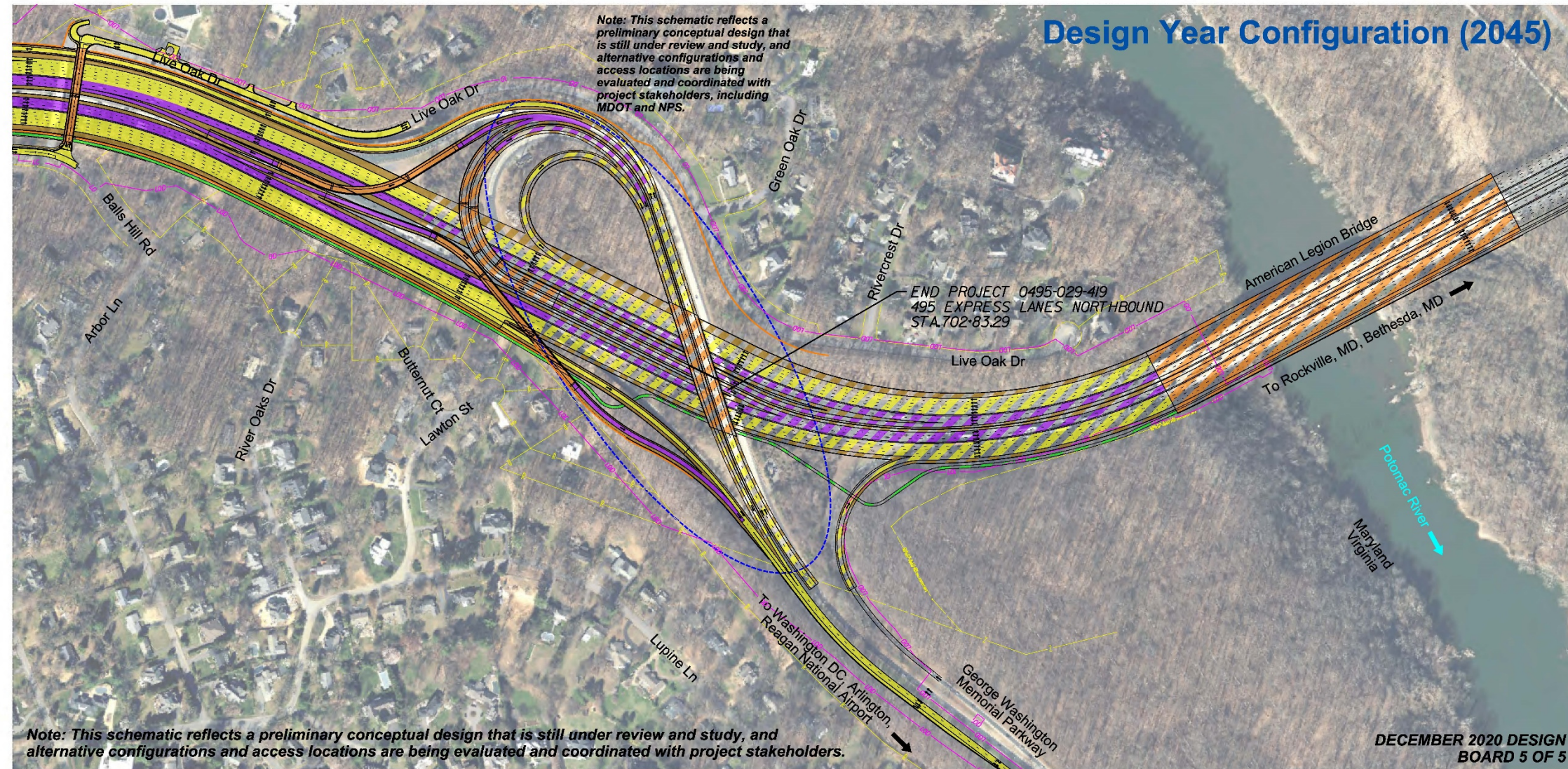
Exhibit 2-1d. Build Alternative Ultimate Configuration Concept Design (Sheet 4 of 5)





# I-495 Express Lanes Northern Extension Study

## Location and Design Public Hearing Update - January 2021



Note: This schematic reflects a preliminary conceptual design that is still under review and study, and alternative configurations and access locations are being evaluated and coordinated with project stakeholders.

DECEMBER 2020 DESIGN BOARD 5 OF 5

<p>Project Location</p>	<p>North Arrow &amp; Scale</p>	<p>Legend</p> <table border="0"> <tr> <td> Proposed Express Lanes and Ramps</td> <td> Potential Future Express Lanes and Ramps By Others</td> <td> Proposed Paved Shoulder/Raised Median</td> <td> Potential Future Paved Shoulder/Raised Median By Others</td> <td> Proposed Shared Use Path</td> <td> Potential Future Shared Use Path By Others</td> <td> Existing Right of Way</td> </tr> <tr> <td> Proposed General Purpose Lanes Improvements</td> <td> Potential Future General Purpose Lanes Improvements By Others</td> <td> Proposed Bridge</td> <td> Potential Future Bridge By Others</td> <td> Signal</td> <td> Proposed Noise Barrier</td> <td> Proposed Limits of Disturbance</td> </tr> </table>	Proposed Express Lanes and Ramps	Potential Future Express Lanes and Ramps By Others	Proposed Paved Shoulder/Raised Median	Potential Future Paved Shoulder/Raised Median By Others	Proposed Shared Use Path	Potential Future Shared Use Path By Others	Existing Right of Way	Proposed General Purpose Lanes Improvements	Potential Future General Purpose Lanes Improvements By Others	Proposed Bridge	Potential Future Bridge By Others	Signal	Proposed Noise Barrier	Proposed Limits of Disturbance
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I-495 Express Lanes Northern Extension Study - Fairfax County, Virginia - State Project 0495-029-419, P101, R201, C501 - UPC 113414 - Federal Project NHPP-495-5(065)  
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Exhibit 2-1e. Build Alternative Ultimate Configuration Concept Design (Sheet 5 of 5)



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## CHAPTER 3.0 EXISTING CONDITIONS AND ENVIRONMENTAL CONSEQUENCES

### 3.1 INTRODUCTION AND OVERVIEW OF ENVIRONMENTAL ISSUES

Social, economic, physical, and natural resources have the potential to be affected during transportation projects. Therefore, existing environmental conditions and potential impacts are important to identify and understand. The following sections inventory and analyze the potential environmental effects associated with the No Build Alternative and Build Alternative considered in the Interstate 495 (I-495) Express Lanes Northern Extension (NEXT) project in Fairfax County, Virginia.

#### 3.1.1 Study Area

The study area for the I-495 NEXT project is a buffer around the I-495 road corridor which includes all natural, cultural, and physical resources that were analyzed in the Environmental Assessment (EA) and this Revised EA. It does not represent the Limits of Disturbance (LOD) of the project nor imply right-of-way acquisition or construction impact, but rather extends beyond the footprint to tie into the surrounding network, including tying into future network of improvements. Resources that are within the study area but outside of the LOD—such as the Potomac River—were studied but are not anticipated to be impacted. See **Chapter 1** for more details regarding the limits of the corridor and the study area, and **Chapter 2** for adjacent projects such as Maryland’s proposed I-495 Managed Lanes project.

#### 3.1.2 Limits of Disturbance

Potential environmental impacts of the Build Alternative were estimated based on the conceptual level of design LOD as shown in **Figure 3-1** which was used for decision-making purposes during the National Environmental Policy Act (NEPA) process and will be refined as design advances. The LOD is smaller than the study area, and accommodates roadway improvements, drainage, stormwater management facilities, utilities, erosion and sediment control, noise control measures, construction methods, and temporary construction easements. Additional signage and maintenance of traffic activities are anticipated to occur beyond the conceptual level LOD. The LOD extends all the way to the American Legion Memorial Bridge (ALMB) due to pipes, drainage, etc., even though the lanes themselves would not extend that far north.

Impact values presented for the evaluated resources represent the worst-case scenarios and assume complete direct impact to the resource occurring in the LOD. At this time, it is not possible to anticipate the exact locations of each proposed activity, and final impacts would be reviewed and documented during detailed design and permitting activities which can occur following a Federal Highway Authority (FHWA) NEPA decision. As design progresses, measures may be taken to avoid and minimize impacts to environmental resources to the maximum extent practicable. Avoidance and minimization measures which may be considered include, but are not limited to, increasing proposed slopes, addition of retaining walls, refinement of the proposed alignments, and revisions to the typical sections in specific places to avoid or minimize impacts. Other potential minimization and mitigation measures for unavoidable adverse impacts are provided under the Build Alternative sections of each resource that is discussed in this chapter.

**Table 3-1** summarizes the environmental conditions within the study area and, where applicable, summarizes the estimated environmental impacts to those resources for the No Build Alternative and Build Alternative within the conceptual level LOD.

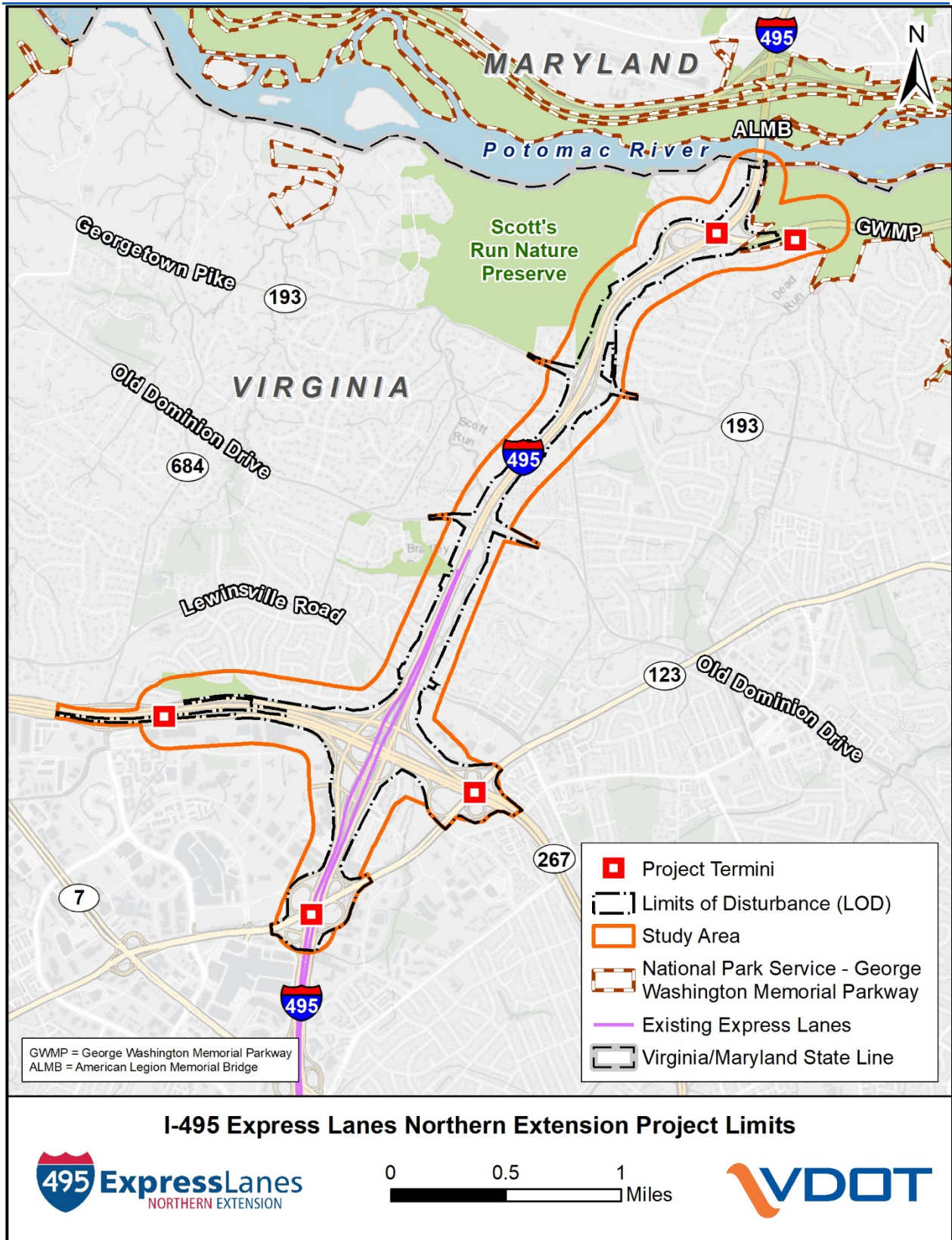


Figure 3-1. I-495 Express Lanes Northern Extension Project Limits

**Table 3-1. Summary of Existing Conditions and Environmental Consequences**

Environmental Resource	Existing Resource Summary	Potential Environmental Consequences		See Section
		No Build Alternative	Build Alternative	
Community and Community Facilities	Tysons, the “downtown” of Fairfax County, is partially located in the study area. A total of 18 residential communities, 12 community facilities, and 13 existing or proposed trail or bicycle facilities are located in the study area. Some drivers use roadways parallel with I-495 to avoid the I-495 congestion, thereby increasing congestion on those local roads.	No direct physical impact on communities or community facilities. Existing congestion would continue along local streets.	No new fragmentation or isolation of communities is anticipated. Greater transportation mobility and improved congestion relief on local arterials is expected. Partial property acquisition of five community facilities is anticipated. Temporary impacts to four existing trail or bicycle/pedestrian facilities is anticipated, and eight proposed trail or bicycle/pedestrian facilities are within the LOD and may be temporarily impacted.	3.2
Population and Housing	The population adjacent to the project corridor is anticipated to grow an average of 2.4% annually compared with 0.7% average annual growth in Fairfax County. Approximately 91% of the housing units are occupied and approximately 57% are owner occupied.	No property acquisition or project-related construction.	Partial acquisitions of 28 residential properties would occur. All existing access to properties in the corridor would be maintained throughout construction. No residential relocations are anticipated.	3.3



Environmental Resource	Existing Resource Summary	Potential Environmental Consequences		See Section
		No Build Alternative	Build Alternative	
Economic Resources	The median household income adjacent to the project corridor is \$165,159 compared with \$121,133 in Fairfax County. A total of 3.4% of the adjacent population is unemployed. The largest employer industry type is professional. Most commuters travel alone by car, truck, or van. I-495 is a major corridor for daily trips between Tysons, Dulles International Airport, and other destinations north and south of the study area.	No improvements within the study area. Congestion and access needs would not be addressed.	Interstate capacity would be added and access points, travel reliability, and travel choices would be improved. Single-occupancy vehicle users of the Express Lanes would be required to pay a variable toll. Carpooling may increase. No commercial relocations would occur, and existing access would remain.	3.4
Land Use	The McLean Planning District and Tysons Urban Center are located in the study area. McLean is predominantly low-density residential neighborhoods and Tyson is a large concentration of office and retail development supported by high-density residential communities. Approved local plans expect land uses to remain similar and include the I-495 Express Lanes and improvements at interchanges. Other notable land uses include parks and recreational sites.	No direct impact on land use, property, or right-of-way. Locally approved infrastructure and development projects would continue. Not consistent with local plans.	Approximately 4.1 acres across 43 properties would be converted to public right-of-way. Project is consistent with local plans to provide Express Lanes on I-495 and to improve interchanges in study area.	3.5

Environmental Resource	Existing Resource Summary	Potential Environmental Consequences		See Section
		No Build Alternative	Build Alternative	
Environmental Justice (EJ)	One block group in the census block groups adjacent to the project corridor has a minority EJ population (52.5%), defined as a minority population greater than the County’s minority population (45.4%). No block groups meet the low-income EJ threshold.	There would be no relocations and no disproportionate and adverse impacts to low-income or minority populations. No mobility improvement would be realized for EJ populations.	Any potential permanent impacts as a result of the project are anticipated to affect all communities equally, so there would be on disproportionately high and adverse impact on EJ communities. Potential temporary right-of-way effects are not considered disproportionately high and adverse. Extended Express Lanes would improve mobility for all users of the Express Lanes and General Purpose Lanes.	3.6
Cultural Resources / Historic Properties	Two National Register of Historic Places (NRHP) listed sites are present in the study area—the George Washington Memorial Parkway (GW Parkway) and Georgetown Pike (Route 193). Two non-contributing structures to the GW Parkway are also located in the study area. One NRHP-eligible archaeological resource is present within the study area – Dead Run Ridges Archaeological District	No temporary, permanent, or constructive uses of existing historic resources would occur.	The Build Alternative was found to have “No Adverse Effect” on historic properties provided conditions to avoid adverse effects are implemented, based on concurrence with VDOT’s determination of effects by Virginia Department of Historic Resources (VDHR) (for all resources) and National Park Service (NPS) (for the GW Parkway). The agreed-upon conditions are listed in <b>Section 3.7.5</b> and letters from VDHR and NPS are included in <b>Appendix D</b> .	3.7

Environmental Resource	Existing Resource Summary	Potential Environmental Consequences		See Section
		No Build Alternative	Build Alternative	
Section 4(f)	Nine Section 4(f) resources are present in the study area—GW Parkway, Scott’s Run Nature Preserve, Georgetown Pike Road Bed, McLean Hamlet Park, Potomac Natural Heritage Trail, Preserve at Scotts Run Homeowners Association Parcel (including Preserve at Scotts Run Conservation Easement and Scotts Run Trail), Timberly Park, and Dead Run Ridges Archaeological District.	No temporary, permanent, or constructive uses of Section 4(f) resources would occur.	None of McLean Hamlet Park, Potomac Natural Heritage Trail, Scotts Run Trail, or Timberly Park would be impacted by the project. Neither the portions of the Georgetown Pike Roadbed, nor the publicly-owned portion of Scotts Run Conservation Easement, that are subject to Section 4(f) are impacted. A total of 4.11 acres of Scott’s Run Nature Preserve are within the LOD and at this point are assumed to be impacted. A total of 0.9 acres of permanent impact as a Highway Easement Deed from FHWA to VDOT and 1.3 acres special use permit to allow construction access are anticipated to the GW Parkway. The LOD does not extend within any of the archaeological resources that contribute to the NRHP eligibility of Dead Run Ridges Archaeological District. The public and the Officials with Jurisdiction (OWJ) over both the Scott’s Run Nature Preserve (FCPA) and the GW Parkway (NPS and the SHPO) have been notified of FHWA’s intention to make a <i>de minimis</i> impact determination with respect to the Build Alternative’s use of land from both the GW Parkway and Scott’s Run Nature Preserve.	3.8
Section 6(f)	One Section 6(f) resource, Scott’s Run Nature Preserve, is located within the study area	No Section 6(f) impacts would occur.	The LOD would impact approximately 4.11 acres (3.01 acres temporary conversion and 1.10 acres permanent incorporation) of land from the Scott’s Run Nature Preserve.	3.9

Environmental Resource	Existing Resource Summary	Potential Environmental Consequences		See Section
		No Build Alternative	Build Alternative	
Air Quality	<p>This project is located within the MD-DC-VA Marginal 8-hour Ozone Nonattainment area, and a volatile organic compounds (VOC) and nitrogen oxides (NO<sub>x</sub>) Emissions Control Area. The region meets all other National Ambient Air Quality Standards (NAAQS) established by the US Environmental Protection Agency (USEPA).</p>	<p>FHWA project-level conformity guidance precludes the need for a No Build evaluation for Ozone. A 2009 Programmatic agreement between FHWA &amp; VDOT for project-level Carbon Monoxide (CO) analysis determined that worst-case CO screening analysis of a Build alternative is applicable to the No Build as well. No meaningful increases in Mobile Source Air Toxics (MSAT) were identified as a result of the No-Build or Build Alternatives and are not expected to cause an adverse effect on human health in future years.</p>	<p>A project level assessment was undertaken meeting all applicable federal and state transportation conformity regulatory requirements as well as air quality guidance under the NEPA. The analysis demonstrated that the build alternative would not cause or contribute to a new violation, increase the frequency or severity of any violation, or delay timely attainment of the NAAQS established by the USEPA. It was also shown that no meaningful increases in MSATs were identified as a result of the No Build or Build Alternatives and they are not expected to cause an adverse effect on human health in future years.</p>	3.10
Noise	<p>A total of 1,115 noise receivers were modeled representing 1,441 noise sensitive receptors to predict how the proposed improvements would affect the noise levels within the limits of the noise study. The modeled receptors included 1,263 residential receptors, 131 recreational receptors, seven interior receptors, and 40 commercial receptors.</p>	<p>No constructive uses of Section 4(f) resources would occur. No Build noise levels and impacts are anticipated to be similar to the Existing Conditions.</p>	<p>A total of 148 noise sensitive receptors including 123 residences and 25 recreational sites were predicted to impacted. Noise abatement was evaluated where warranted. Nine of the 13 existing noise barriers identified within the noise study area would be physically impacted and would be required to be replaced in-kind. Extensions to four of the in-kind replacement barriers were evaluated. One proposed barrier was determined to be feasible and reasonable.</p>	3.11

Environmental Resource	Existing Resource Summary	Potential Environmental Consequences		See Section
		No Build Alternative	Build Alternative	
Waters of the U.S.	Resources are part of the Middle Potomac-Catoctin watershed. A total of 49 streams (28,959 linear feet) and 42.4 acres of wetlands were identified in the study area. Many of the streams are fragmented by pipes or culverts.	No changes to streams or wetlands would result. Stormwater management features would not be improved or added where absent.	A total of 26 streams would be crossed and approximately 12,821 linear feet of streams and 19.8 acres of wetlands are anticipated to be impacted. Compensatory mitigation is anticipated and would be coordinated through the permitting process.	3.12
Water Quality	Dead Run (impaired macroinvertebrate community) and the Potomac River (excess nutrient and sediment inputs) are designated as impaired waters under Section 303(d) of the Clean Water Act (CWA).	No changes in water quality would result. Stormwater management features would not be improved or added where absent.	Potential impacts to Dead Run during construction include erosion, sedimentation, or accidental spills of hazardous materials from construction equipment. The outfall into the Potomac River would deposit water treated onsite, and therefore is not anticipated to further deteriorate water quality within the Potomac River.	3.13
Floodplains	Approximately 94.1 acres of 100-year floodplains associated with three waterways are located within the study area.	No changes to floodplains would result.	Approximately 60 acres of floodplains are located within the LOD. The project design would be consistent with federal policies and would not be a “significant encroachment.” No increase in flood levels or probability of flooding are expected.	3.14

<p>Wildlife and Habitat</p>	<p>Available wildlife habitat accounts for approximately 641 acres of the study area, and approximately 35% of this habitat is within existing VDOT right-of-way and is therefore reserved for transportation purposes. Terrestrial habitat is fragmented due to the existing highway, resulting in low-quality edge habitat. The edge habitat along the highway in the right-of-way, interchange loops, and the area in the median is poor habitat for wildlife due to access restrictions posed by the travel lanes, less natural forest cover, and an increase in impervious surfaces and turfgrass. Based on the Virginia Department of Wildlife Resources (VDWR) Virginia Fish and Wildlife Information Service (VaFWIS) database (and additional resources Roble, 2020 and Townsend, 2021), a total of 68 species are likely to occur or are confirmed to occur within a 2-mile radius of the study area. Additional species that are new state records, species new to science, or species newly discovered documented in Turkey Run Park, part of the GW Parkway, may also occur within the study area.</p>	<p>No changes to wildlife, existing land use, or habitat fragmentation levels would result. The barrier to wildlife passage created by the existing highway would remain unchanged.</p>	<p>Approximately 233 acres of available wildlife habitat would be impacted, and 80% of this habitat is within existing right-of-way. Increasing the width of the roadway corridor would not likely increase habitat fragmentation as forested land would not be newly separated from contiguous forest. No elimination of existing wildlife passages is anticipated.</p>	<p>3.15</p>
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Environmental Resource	Existing Resource Summary	Potential Environmental Consequences		See Section
		No Build Alternative	Build Alternative	
Threatened, Endangered, and Special Status Species	The following state or federally listed species were identified to have confirmed or historic occurrences within a 2-mile radius of the study area: northern long-eared bat ( <i>Myotis septentrionalis</i> ), rusty patched bumble bee ( <i>Bombus affinis</i> , historic), little brown bat ( <i>Myotis lucifugus</i> ), tri-colored bat ( <i>Perimyotis subflavus</i> ), and wood turtle ( <i>Glyptemys insculpta</i> ), and the Appalachian springsnail ( <i>Fontigens bottimeri</i> ).	No changes to populations of threatened or endangered species, or their respective habitats, would result.	Tree clearing could impact potential suitable summer habitat for the three bat species, with the majority occurring along the edge of existing right-of-way resulting in minimal reduction in forested cover and quality of forested habitat. Streams and floodplains that contain potential habitat for the wood turtle would be impacted. Additional mitigation would be determined during permitting and design.	3.16
Hazardous Materials	Two High Priority hazardous material sites, 29 Moderate Priority hazardous material sites, and 108 Low Priority hazardous material sites were identified.	No impacts to hazardous material sites would result.	Further assessment of Moderate and High Priority hazardous materials sites and the correlation to the final design limits of disturbance is recommended.	3.17

Environmental Resource	Existing Resource Summary	Potential Environmental Consequences		See Section
		No Build Alternative	Build Alternative	
Indirect and Cumulative Effects	Past and present actions have shaped the current state of land use and socioeconomic, natural, and historic resources within the indirect and cumulative effects study areas. These actions have been both beneficial and adverse to land use, socioeconomic, natural, and historic resources.	No impacts would result other than those caused by other past, present, and reasonably foreseeable future projects.	<p>Indirect impacts from encroachment or induced growth may include altering access to communities and associated community facilities or services, increased runoff and the consequent increase in pollutant discharge and changes to hydrologic regime, impacts to floodplains through alteration of drainage patterns and flood flows, reduction in forested cover and quality of forested habitat, alteration of landscape habitat, and temporary impacts to historic resources.</p> <p>Overall cumulative effects are anticipated to be low since the region is already developed, protected, or development is slated to continue by the encompassing localities.</p>	3.18

CO = Carbon Monoxide; CWA = Clean Water Act; EJ = Environmental Justice; FHWA = Federal Highway Authority; GW Parkway = George Washington Memorial Parkway; LOD = Limits of Disturbance; MSAT = Mobile Source Air Toxics; NAAQS = National Ambient Air Quality Standards; NOx = Nitrogen Oxides; NPS = National Park Service; NRHP = National Register of Historic Places; USEPA = United States Environmental Protection Agency; VaFWIS = Virginia Fish and Wildlife Information Service; VDHR = Virginia Department of Historic Resources; VDOT = Virginia Department of Transportation; VDWR = Virginia Department of Wildlife Resources; VOC = Volatile Organic Compounds;

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## 3.2 COMMUNITIES AND COMMUNITY FACILITIES

### 3.2.1 Existing Conditions

The study area is composed primarily of low-density residential communities within the McLean area with a small section of denser multiuse development within Tysons Urban Center. Both McLean and Tysons are unincorporated communities of Fairfax County and were well established at the time I-495 was constructed in the early 1960s. Tysons has seen much more rapid growth compared to other locations near the I-495 corridor and now serves as a “downtown” of Fairfax County, with one-quarter of all office space and one-eighth of all retail in the county.

A total of 18 residential communities were identified within or directly adjacent to the study area. Very few of the neighborhoods existed prior to the construction of I-495; most of these neighborhoods were not fully developed until after I-495 was constructed and were platted to make full use of the land up to the I-495 right-of-way. Therefore, there was no fragmentation of these communities as a result of the construction of I-495. Today, with build-out of these areas completed, the edges of several subdivisions now directly abut the I-495 corridor.

Twelve community facilities are in the study area including three places of worship, a civic organization center, two schools, five parks or recreational areas, and a senior living center (see **Figure 3-2**). Cooper Middle School is approximately 800 feet from the existing I-495 roadway, with Balls Hill Road and the I-495 ramp to Georgetown Pike located between the school and I-495. Basis Independent McLean is a private K-12 school that is approximately 2,200 feet from the existing I-495 roadway, with the ramps from VA-267 to I-495 located between the school and I-495.

A qualitative assessment of children’s health has been performed in accordance with Executive Order 13045, Protection of Children from Environmental Health Risks and Safety Risks, which directs federal agencies to identify and assess environmental health and safety risks that may disproportionately affect children. Impacts to children are considered separately because children may experience a different intensity of impact as compared to an adult exposed to the same event. The most likely locations of potential effects on children, in addition to residences, would be at schools where there are outdoor activity areas for children. Cooper Middle School and the Basis Independent McLean private school are located within the study area. The children that attend these schools are already subjected to the air quality, noise, and traffic conditions associated with the interstate.

Eleven existing and eight proposed recreational trails and bicycle facilities were identified in the study area, as shown in **Figure 3-3**. These include multi-use trails alongside roadways, on-road bike lanes, designated bike routes, and off-street trails. For additional detail, refer to the *I-495 Revised Socioeconomic and Land Use Technical Report* (VDOT, 2021e).

The local roads surrounding the study area have seen an increase in congestion and a decrease in community mobility as a result of detouring and cut-through traffic to avoid I-495, especially during peak traffic hours. Additional information regarding traffic and congestion is provided in the *I-495 Traffic and Transportation Technical Report* (VDOT, 2020d).

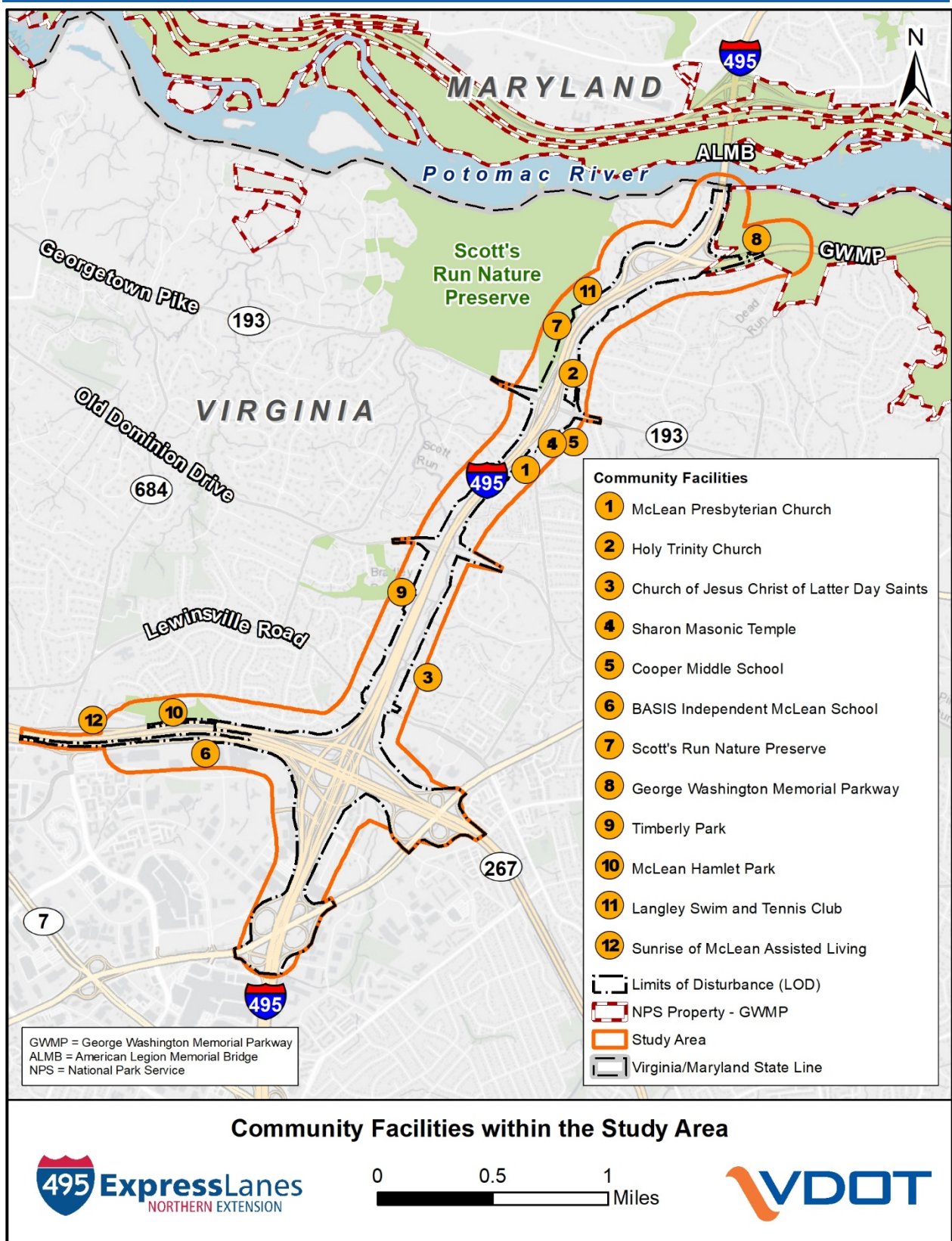
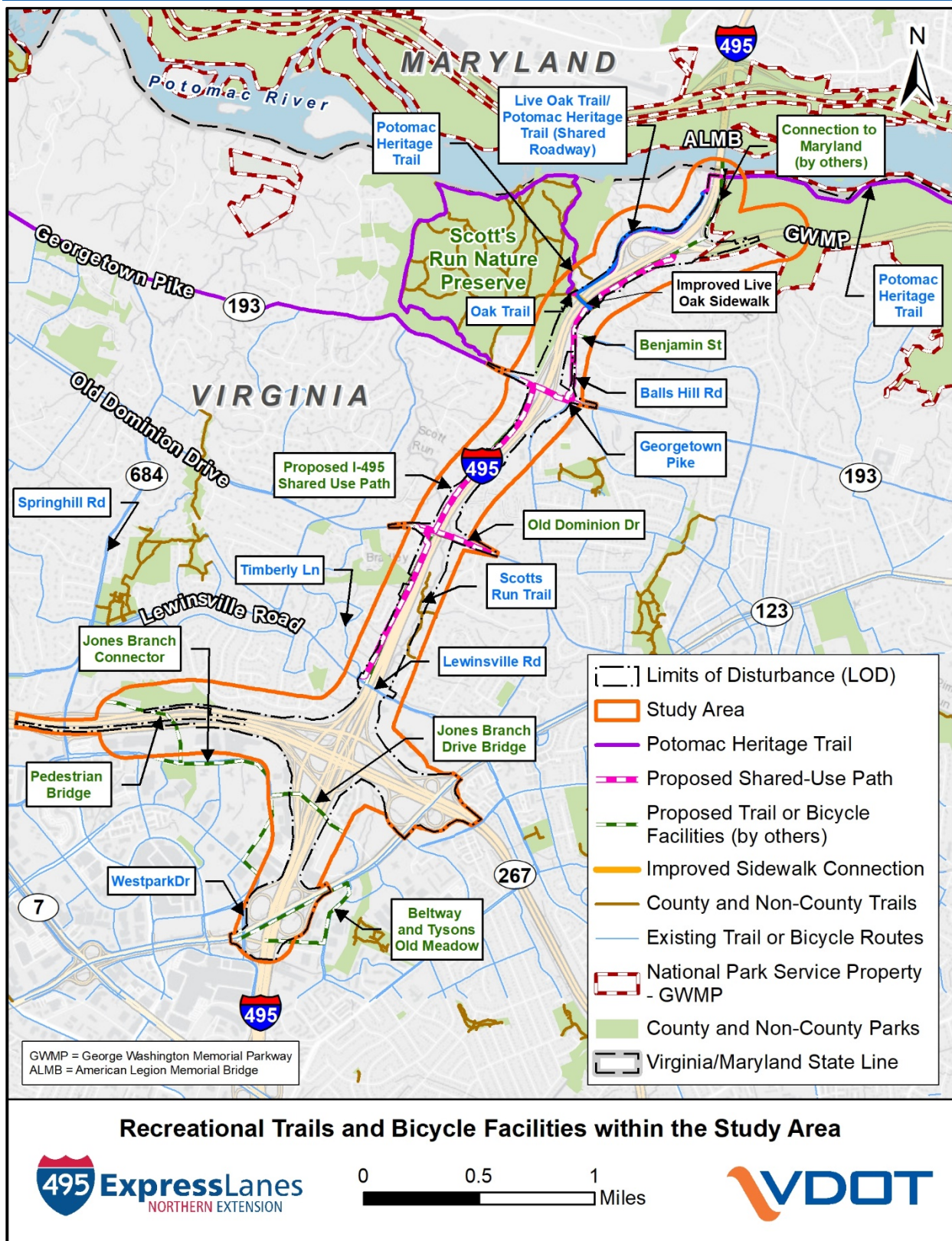


Figure 3-2. Community Facilities within the Study Area





Source: Fairfax County, 2018a

Figure 3-3. Recreational Trails and Bicycle Facilities within the Study Area

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### 3.2.2 Environmental Consequences

#### ***No Build Alternative***

The No Build Alternative would have no direct impact on communities or community facilities in the study area. The No Build Alternative would not result in any changes to existing recreational trails, bike lanes, and bike routes within the study area.

#### ***Build Alternative***

##### Community Cohesion

Most neighborhoods in the study area were built after the construction of I-495, and those immediately along the interstate corridor were designed to be immediately adjacent to the I-495 right-of-way. Although the Build Alternative would have some physical impacts on some properties within the LOD, no relocations are anticipated, and these impacts would be on the outside edges of the communities rather than through the communities. Therefore, the Build Alternative would not result in new fragmentation or isolation of any communities within the study area. Stormwater and utility alterations would be taking place primarily within existing right of way, and any changes outside of existing right of way would not result in community fragmentation. No further impacts to neighborhood connectivity or cohesion within the study area would occur.

The Build Alternative would result in greater transportation mobility and improved congestion relief along the I-495 corridor, including local arterials, as discussed in the *I-495 Traffic and Transportation Technical Report* (VDOT, 2020d). The Build Alternative would provide additional connections between residential communities on either side of the project via a parallel trail (shared use path). The proposed shared use path is consistent with local and regional land use and transportation plans.

##### Viewshed

Following the public hearing for the I-495 NEXT project in October 2020, comments from the McLean Hamlet neighborhood were received regarding the potential for viewshed impacts from the project on the neighborhood. The neighborhood is located in the northwest corner of the I-495 and Dulles Toll Road interchange and bound by Lewinsville Road to the north and Spring Hill Road to the west. The Build Alternative would construct new flyover ramps at the I-495 and Dulles Toll Road interchange to improve the mobility between the two highways. These flyover ramps would be elevated higher than the existing at-grade ramps in the northwest quadrant of the interchange.

Visualizations from two locations within McLean Hamlet near the interchange were prepared and shared with the neighborhood as part of the public involvement process to help the community visualize the I-495 NEXT project in relation to their neighborhood. **Figure 3-4** shows the existing viewshed facing southeast from Falstaff Road near the intersection with Lear Road and **Figure 3-5** shows the viewshed after construction of the Build Alternative, with the visible infrastructure circled in orange. **Figure 3-6** shows the existing viewshed facing southeast from Snow Meadow Lane and **Figure 3-7** shows the viewshed after construction of the Build Alternative, with the visible infrastructure circled in orange.





**Figure 3-4. Existing view facing southeast from Falstaff Road near Lear Road**

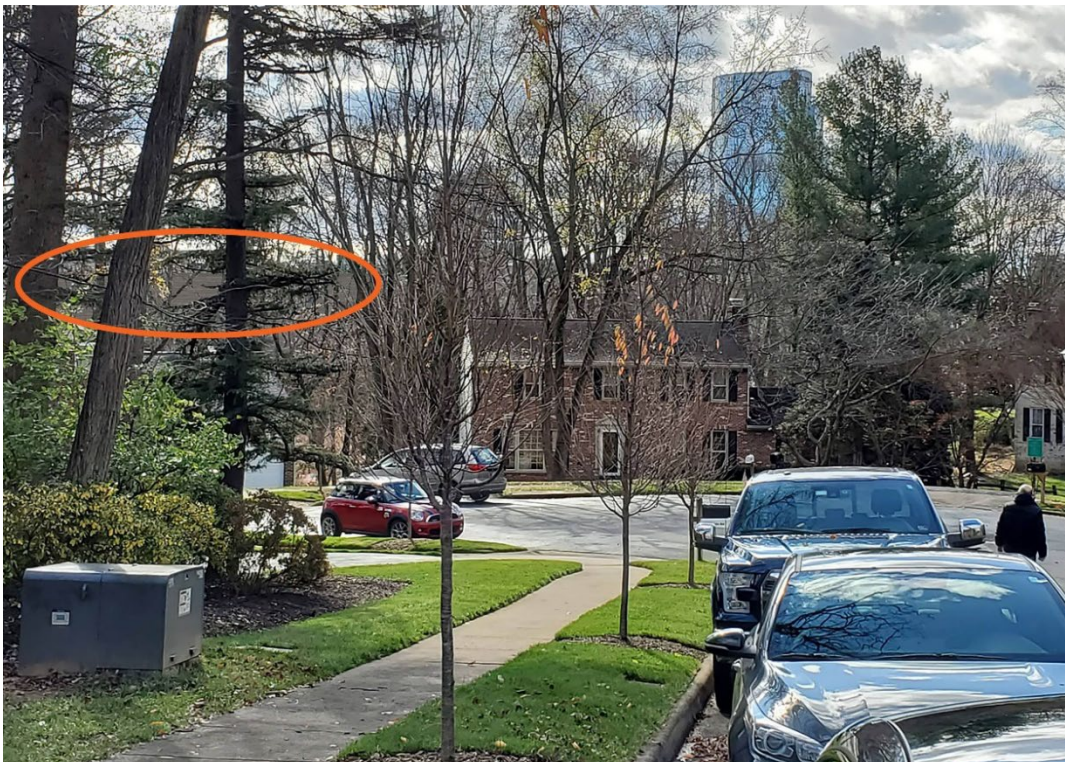


**Figure 3-5. Visualization of Build Alternative facing southeast from Falstaff Road near Lear Road**





**Figure 3-6. Existing view facing southeast from Snow Meadow Lane**



**Figure 3-7. Visualization of Build Alternative facing southeast from Snow Meadow Lane**

Comments were also received regarding the potential for viewshed impacts from the project on the neighborhoods around the GW Parkway interchange. Around this interchange single family residences are located to the west of I-495 along Live Oak Drive within the Eagle Rock and River Oaks neighborhoods and in the southeast quadrant of the interchange within the Parkview Hills, River Oaks, and Langley Forest neighborhoods. The Build Alternative would reconstruct the northbound off-ramp and the southbound on-ramp within the GW Parkway interchange and construct new flyover ramps to connect the proposed Express Lanes with the GW Parkway. These flyover ramps would be elevated higher than the existing at-grade ramps. The existing noise barriers would also be reconstructed. Visualizations from two locations on Live Oak Drive west of I-495 and from two locations each on Butternut Court and Lawton Street east of I-495.

**Figure 3-8** through **Figure 3-11** show the existing viewsheds and visualizations of the Build Alternative facing north and south along Live Oak Drive approximately 500 feet north of the Langley Swim and Tennis Club entrance. **Figure 3-12** through **Figure 3-15** show the existing viewsheds and visualizations of the Build Alternative facing west and north from Butternut Court. **Figure 3-16** through **Figure 3-19** show the existing viewsheds and visualizations of the Build Alternative facing north from Lawton Street.





**Figure 3-8. Existing view facing north along Live Oak Drive**



**Figure 3-9. Visualization of Build Alternative facing north along Live Oak Drive**





**Figure 3-10. Existing view facing south along Live Oak Drive**

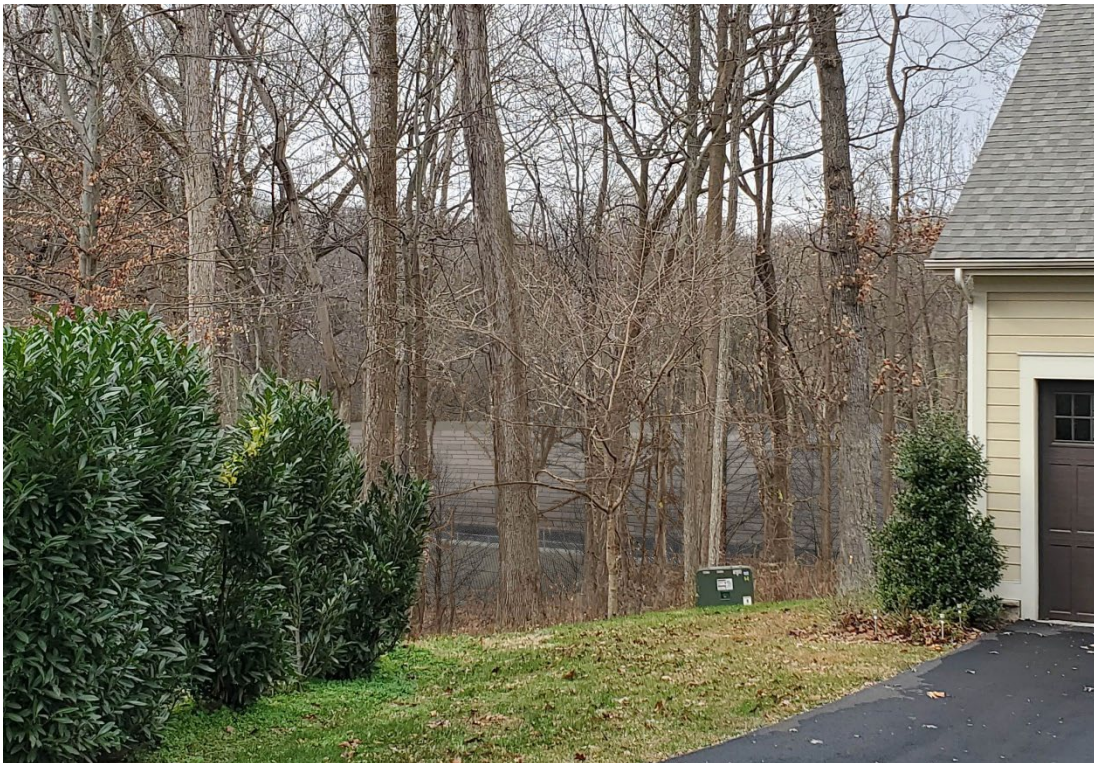


**Figure 3-11. Visualization of Build Alternative facing south along Live Oak Drive**





**Figure 3-12. Existing view facing west from Butternut Court**



**Figure 3-13. Visualization of Build Alternative facing west from Butternut Court**





**Figure 3-14. Existing view facing north from Butternut Court**



**Figure 3-15. Visualization of Build Alternative facing north from Butternut Court**





**Figure 3-16. Existing view facing north from Lawton Street**



**Figure 3-17. Visualization of Build Alternative facing north from Lawton Street**





**Figure 3-18. Existing view facing north from Lawton Street**



**Figure 3-19. Visualization of Build Alternative facing north from Lawton Street**



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### Community Resources

Access to community facilities would be maintained during construction and operation of the Build Alternative. The Build Alternative would have a direct, permanent impact through partial property acquisitions which would not require relocation of buildings or jeopardize the primary use of, or long-term access to, community facilities. The following facilities are within the LOD, with potential impacts in the amounts shown below, based on the extent of the LOD. These quantities do not represent final right-of-way or easement acquisition. See the *I-495 Revised Socioeconomic and Land Use Technical Report* (VDOT, 2021e) for more detail on anticipated impacts to community features. VDOT has coordinated with the community regarding anticipated impacts to these facilities and potential mitigation measures, including multiple meetings with individual organizations as listed in **Section 4.5.5**.

- McLean Presbyterian Church – 0.5 acres
- Holy Trinity Church – 1.7 acres
- Scott’s Run Nature Preserve – 4.1 acres
- George Washington Memorial Parkway (GW Parkway) – 0.9 acres permanent impact as a Highway Easement Deed from FHWA to VDOT and 1.3 acres special use permit to allow construction access are anticipated to be directly impacted. An additional 2.6 acres of the GW Parkway are within the LOD and lie directly adjacent to the GW Parkway’s existing roadway but would not be impacted by the I-495 NEXT project, either temporarily or permanently.\*
- Langley Swim and Tennis Club – 0.2 acres

\* For other resources discussed in this Revised EA, the area within the LOD is reported as the potential impact area. However, since additional coordination has occurred with NPS and DHR regarding GW Parkway, a more precise anticipated impact area for GW Parkway has been presented here. During final design, a more precise impact calculation will also be developed for other resources.

### Bicycle and Pedestrian Facilities

The following existing recreational trails and pedestrian/bicycle facilities in the study area may be temporarily affected during construction based on the LOD:

- Balls Hill Road – This facility is an existing sidewalk adjacent to the roadway, which would be replaced with a wider asphalt shared use path in the same location. The existing sidewalk would be temporarily closed during this portion of construction – approximately 1,820 feet within LOD
- Georgetown Pike – This facility is an existing sidewalk, part of which would be replaced with a wider shared use path – approximately 1,115 feet within LOD
- Live Oak Trail (and Potomac Heritage National Scenic Trail)\* – These trails primarily follow the same alignment along Live Oak Drive. The on-street portion would be realigned with the roadway, but both the road and trail would remain open during construction – approximately 4,575 feet within LOD
- Old Dominion Drive – This facility is an existing sidewalk on the bridge, which would be replaced with a wider shared use path on the proposed new bridge – approximately 410 feet within the LOD

The following existing recreational trails and pedestrian/bicycle facilities are in the LOD but are not anticipated to be impacted:

- Lewinsville Road – approximately 730 feet within LOD

- Oak Trail (and Potomac Heritage National Scenic Trail)\* – These trails follow the same alignment connecting from Scott’s Run Nature Preserve to Live Oak Drive – approximately 120 feet within LOD
- Potomac Heritage National Scenic Trail (off-street segment at the ALMB)\* – approximately 825 feet within LOD\*\*
- Scotts Run Trail – approximately 1,570 feet within LOD
- Spring Hill Road – approximately 85 feet within the LOD
- Timberly Lane – approximately 30 feet within the LOD
- Westpark Drive – approximately 540 feet within LOD

\* To avoid double counting, impact numbers associated with this alignment include 1) Potomac Heritage National Scenic Trail and Oak Trail where they share a common alignment (120 feet); 2) Live Oak Trail and Potomac Heritage National Scenic Trail where they share a common alignment (4,080 feet); 3) solely the Live Oak Trail and sidewalk at the I-495 overpass (495 feet); and 4) solely the Potomac Heritage National Scenic Trail (825 feet).

\*\* Although the Potomac Heritage National Scenic Trail is shown within the LOD, the project is not anticipated to permanently impact this resource. The off-street portion under the ALMB would be maintained during construction.

Several additional recreational trails and bicycle/pedestrian facilities are also proposed within the study area, based on available Fairfax County Geographic Information System (GIS) data and the *Fairfax County Bicycle Master Plan* (Fairfax, 2014). The following proposed facilities may be temporarily impacted during construction based on the LOD, depending on their location and when they are constructed:

- Benjamin Street – approximately 60 feet within LOD
- Beltway and Tysons Old Meadow – approximately 3,100 feet within the LOD
- Connection to Maryland Trail – 3,900 feet within the LOD
- Dolley Madison Boulevard – approximately 2,000 feet within the LOD
- Georgetown Pike – approximately 870 feet within the LOD (a proposed shared use path in addition to the existing sidewalk)
- Jones Branch Drive Bridge – approximately 1,110 feet within the LOD
- Old Dominion Drive – approximately 975 feet within the LOD (a proposed shared use path in addition to the existing sidewalk over the bridge)
- Pedestrian Bridge over Route 267 – approximately 315 feet within the LOD

Safe access for non-motorized users as a result of detours, closures, and other inconveniences during the construction phases would be included in construction phasing plans.

### Children’s Health

With respect to Executive Order 13045, Protection of Children from Environmental Health Risks and Safety Risks, the impact the proposed widening of the interstate would have on air quality and noise, as well as traffic conditions, has been assessed (see Sections 3.10, 3.11, and 1.4 of this Revised EA respectively, as well as the associated technical reports). For air quality impacts, the analyses show that the proposed improvements would not exceed the national ambient air quality standards established by the EPA to protect human health and welfare, including children. For noise impacts, sound barriers have been proposed where appropriate. Following an FHWA NEPA decision, VDOT and/or its contractor(s) could complete a final design noise analysis to determine where sound barriers are found to be reasonable and feasible. If the school was found to require new and/or additional barriers, they would be included as part of the final

design of the project. For traffic impacts, traffic volumes on local roadways immediately adjacent to the schools would be lower with the Build Alternative than with the No-Build Alternative. Following an FHWA NEPA decision, a maintenance of traffic plan could be developed to ensure children's health is not disproportionately affected during the construction process.

### 3.3 POPULATION AND HOUSING

#### 3.3.1 Existing Conditions

The population of Fairfax County is estimated to be 1,143,529 people (ACS, 2018). The Metropolitan Washington Council of Governments (MWCOC) projects that the population of Fairfax County would increase an average of 0.7% annually (to 1,469,595 persons in 2045) (MWCOC, 2018). The area more immediately adjacent to the project corridor is anticipated to grow an average of 2.4% annually (to 50,723 persons in 2045). This represents a rate of population growth nearly four times larger than that of the surrounding county. The fastest growing areas within Tysons, anticipated to grow at an average annual rate of up to 30% annually, exceed the growth rate of the county by more than thirty times the county rate.

Approximately 91% of the housing units in the census block groups within the study area are occupied. A mix of housing types ranges from detached single-family homes and townhouses to apartment buildings. Approximately 57% of the housing units are owner occupied, which is lower than the 85% owner occupied rates of McLean (ACS, 2018).

For additional information, refer to the *I-495 Revised Socioeconomic and Land Use Technical Report* (VDOT, 2021e).

#### 3.3.2 Environmental Consequences

##### *No Build Alternative*

The No Build Alternative would not result in any property acquisitions or project-related construction and therefore no impacts to population or housing would occur.

##### *Build Alternative*

A total of 28 residential properties would be partially impacted by permanent right-of-way acquisitions or maintenance easements under the Build Alternative, as detailed in the *I-495 Revised Socioeconomic and Land Use Technical Report* (VDOT, 2021e). The partial property acquisitions are not anticipated to jeopardize the primary use of or access to any property. No residential relocations are proposed. All existing access to properties in the corridor would be maintained throughout construction. Therefore, no long-term effects to population or housing would result.

### 3.4 ECONOMIC RESOURCES

#### 3.4.1 Existing Conditions

##### *Income and Employment*

The median household income for the census block groups adjacent to the project corridor is \$165,159 which is greater than Fairfax County (\$121,133) and Tysons (\$102,072). A total of 3.4% of the population in the adjacent census block groups is unemployed compared with 3.7% in Fairfax County, 2.7% in McLean, and 11.9% in Tysons. The majority of the employed civilian population in the adjacent census block groups is in professional, scientific, management, administrative, and waste management (35%);



educational services, health care, and social assistance (17%); and public administration (11%) (ACS, 2018). According to the Fairfax County Economic Development Authority, the top employers in Fairfax County include Inova Health System, Booz Allen Hamilton, Capital One, Freddie Mac, SAIC, Amazon, Constellis, Deloitte, General Dynamics, The MITRE Corporation, Navy Federal Credit Union, Northrop Grumman, and Perspecta (FCEDA, 2019).

### ***Travel to Work***

Most commuters originating near the project corridor commute alone by car, truck, or van (71.9%). The next largest portions of the population, 11.2% and 7.3%, work at home or commute via public transit respectively. I-495 is a major regional route connecting employees to jobs and production to consumption sites within the study area and throughout the Washington, D.C. region.

A travel pattern analysis along I-495 in the study area showed that trips through the project corridor have a wide-ranging set of origins and destinations well outside the adjacent properties. One of the most common destinations for southbound traffic along I-495 through the study area is Tysons, the central business and shopping district for Fairfax County and the largest concentration of commercial office space and retail in the Washington, D.C. region. Among the most common origins for I-495 northbound traffic through the study area are Tysons, Dulles International Airport, and the I-95 corridor. I-495 provides the main north-south regional transportation link into and out of Tysons. Additional detail on commuting patterns is in the *I-495 Revised Socioeconomic and Land Use Technical Report* (VDOT, 2021e).

Travel speeds along I-495 within the study area for both the GP and the Express Lanes are highly inconsistent and can vary substantially by hour and by day, with the slowest speeds in the northbound direction. Driving times through this 5-mile section of I-495 during the afternoon peak period (“rush hour”) can range from about five to almost sixty minutes. All users of I-495 are equally affected by inconsistent travel speeds and long travel times, including those who drive alone, carpool, drive trucks, or take the bus (VDOT, 2020d). These challenges can affect users’ decisions on when and where to travel, which could decrease opportunities for working, shopping, and other travel purposes.

For additional information on travel speeds, refer to the *I-495 Traffic and Transportation Technical Report* (VDOT, 2020d).

## **3.4.2 Environmental Consequences**

### ***No Build Alternative***

The No Build Alternative would result in no improvements to this segment of I-495. This alternative would not address congestion, provide improved regional access within or through the study area, or improve travel time reliability and predictability. Therefore, there would be no change in the attractiveness of employment opportunities near the study area for qualified workers in the larger geographic area, or the ease for those workers to travel to nearby employment opportunities.

### ***Build Alternative***

The Build Alternative’s reduced travel times and improved travel reliability would make employment opportunities near the study area more attractive to qualified workers in a larger geographic area who were previously deterred by long travel times and unreliability. This could boost employment growth and productivity within the study area and the region as a whole.

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## 3.5 LAND USE

### 3.5.1 Existing Conditions

#### *Existing Land Use*

Land uses in the study area, other than public right-of-way, are primarily low-density residential (23%), commercial (10%), and recreational (11%). There are three major government facilities located in the study area on Tysons McLean Drive: National Counterterrorism Center, Liberty Crossing Intelligence Campus, and National Counterproliferation Center.

There are many parks and recreational uses in the vicinity, including several within the study area. These are particularly concentrated in the northern part of the study area. The largest sites are the GW Parkway and surrounding parkland (which are owned by the United States and administered by the National Park Service (NPS)), and the Scott's Run Nature Preserve (owned by the Fairfax County Park Authority (FCPA)), shown on **Figure 3-21**. The GW Parkway and surrounding parkland is owned by the United States and administered by NPS, and are recreational and historical properties with environmental, cultural, and national importance. The GW Parkway has been designated as an All-American Road in the National Scenic Byways Program, which carries the requirements of a Scenic Byway (meeting one or more of six "intrinsic qualities": archaeological, cultural, historic, natural, recreational, and scenic) and also "contain one-of-a-kind features that do not exist elsewhere (NPS website<sup>1</sup>).

Fairfax County land use data designated the GW Parkway and Scott's Run Nature Preserve as institutional use because of the agency ownership; these sites have been documented as a recreational use for the purposes of this report. VDOT has coordinated with and will continue to coordinate with both FCPA and NPS throughout development of this project and will continue to seek ways to minimize and mitigate the project's design. These minimization and mitigation measures are anticipated to reduce impacts to recreational properties within the study area. More regarding these recreational resources is provided in **Section 3.8**.

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<sup>1</sup> <https://www.nps.gov/gwmp/learn/management/index.htm>

**Land Use and Transportation Plans**

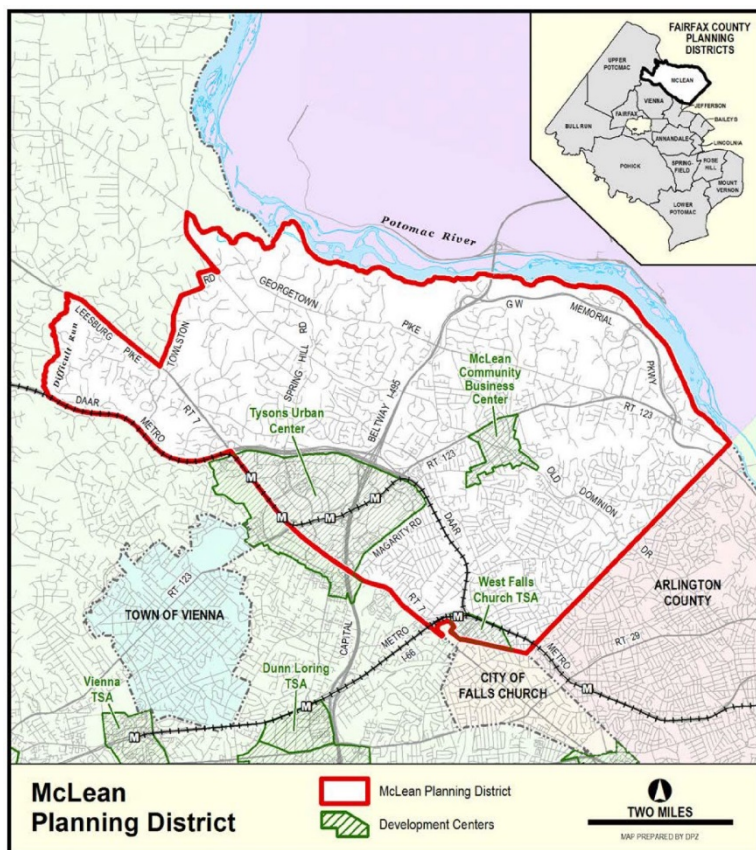
Land use and development within Fairfax County and the study area is guided by the *Fairfax County Comprehensive Plan* (Fairfax County, 2017). I-495 is a major transportation corridor that surrounds Washington, D.C. and connects the adjacent communities within Maryland and Virginia. The plan includes two unique districts that are within the study area: the proposed project lies mostly within the McLean Planning District, and a portion of the southern terminus of the study area lies within Tysons Urban Center (see **Figure 3-20**).

The McLean Planning District is in the northeast portion of Fairfax County and is bounded on the north by the Potomac River, on the southeast by Arlington County and the City of Falls Church, and on the southwest by Leesburg Pike and Route 7. According to the *Fairfax County Comprehensive Plan*, the McLean Planning District is predominantly composed of stable, low-density residential neighborhoods and the 230-acre McLean Community Business Center (Fairfax County, 2017). Commercial uses are limited, with only a few neighborhood-oriented commercial areas throughout the planning district. The Comprehensive Plan recommends maintaining most of the McLean Planning District as Suburban Neighborhoods and Low-Density Residential Areas for future land use.

The Tysons Urban Center is the largest concentration of transit-oriented development and retail in the Washington, D.C. region. Tysons is located at the convergence of I-495, Route 267, Leesburg Pike, and Chain Bridge Road/Dolley Madison Boulevard and is also accessible via four Silver Line Metrorail stations: McLean, Tysons Corner, Greensboro, and Spring Hill. According to the *Fairfax County Comprehensive Plan*, Tysons is comprised of a large concentration of office and retail development that is supported by the adjacent high-density residential communities (Fairfax County, 2017).

**Future Land Use**

Due to the high level of development throughout the study area, options for future development are limited. Fairfax County's *Concept for Future Development Map* (adopted June 2012) depicts this area as continuing to have mostly suburban neighborhood development (Fairfax County, 2018b). The portion of the study area northeast of Route 193 that borders the Potomac River is proposed to continue as low-density residential.



Source: 2017 Fairfax County Comprehensive Plan

**Figure 3-20. 2017 McLean Planning District Map**

The *Fairfax County Transportation Plan* (Fairfax County, 2015) and *Fairfax County Comprehensive Plan* (Fairfax County, 2017) depict I-495 within the study area as having Express Lanes and improvements at the GW Parkway, Route 193, and Route 267 interchanges, including a new highway overpass above I-495.

For additional information about land use, refer to the *I-495 Revised Socioeconomic and Land Use Technical Report* (VDOT, 2021e).

### **Utilities**

A small portion of land in the LOD is designated for utility use, located in the southwest quadrant of the I-495/Route 267 interchange. In addition, a 230 kilovolt (kv) overhead Dominion power transmission line is within the LOD west of I-495 between Lewinsville Road and Live Oak Drive, and east of I-495 north of Live Oak Drive, with the power line crossing I-495 near Live Oak Drive. Underground gas, water, and electric lines are also within the LOD. Specific utility locations and types would be identified during the final design survey.

## **3.5.2 Environmental Consequences**

### **No Build Alternative**

The No Build Alternative would involve no construction and would not require right-of-way acquisition; therefore, it would have no direct impact on land use, property, or right-of-way. The No Build Alternative is not consistent with the *Fairfax County Transportation Plan* or the *McLean Planning District Plan* because it would not provide Express Lanes or interchange improvements as identified in those plans.

### **Build Alternative**

**Table 3-2** shows the proportion of land uses within the study area that would be permanently converted to public roadway right-of-way, permanent maintenance easement, or transferred to VDOT from FHWA as a Highway Easement Deed under the Build Alternative. It also shows the number of properties of each land use type, classified by Fairfax County GIS, that would be partially affected or fully acquired.

The majority of construction would be limited to the existing right-of-way; however, locations in the vicinity of the Route 267 and GW Parkway interchanges and overpasses would require property acquisitions. A total of 11.2 acres would be permanently converted from its present use to transportation under the Build Alternative.

No full property acquisitions or relocations of residential, commercial, recreational, or institutional properties are proposed. Partial property acquisitions are not anticipated to jeopardize the primary use of or access to any property. Temporary access easements required for the construction of the Build Alternative would be short-term and returned to the existing land use once construction is completed.

Part of the land in the LOD designated for utility use in the southwest quadrant of the I-495/Route 267 interchange would be impacted. In addition, overhead Dominion power lines are anticipated to be impacted by proposed road widening, trail, and stormwater management facilities. The required relocation of the Dominion power lines are not anticipated to be placed on GW Parkway property; VDOT has continued to coordinate with NPS and Dominion to minimize impacts during the preliminary design phase. Relocation of underground water, gas, and electric lines may also be required. Utility impacts and relocations would be determined during final design.

**Table 3-2. Land Use Conversion Under the Build Alternative**

Land Use	Acres within Study Area	Acres Converted to Public Roadway Right-of-Way	Acres Converted to Permanent Maintenance Easement	Number of Parcels Partially Converted to Transportation Use**
Commercial	104.2	-	-	-
High-Density Residential	16.6	-	-	-
Medium-Density Residential	<0.1	-	-	-
Low-Density Residential	238.6	1.2	2.1	26
Institutional	18.8	0.4	0.7	2
Open Land, not forested or developed	62.6	1.7	4.3	12
Recreational*	108.4	0.6 (FCPA)	0.24 (FCPA) 0.14 (Private)	2
Utilities	4.3	0.2	<0.1	1
<b>Total</b>	<b>553.6</b>	<b>4.1</b>	<b>7.6</b>	<b>43</b>

Source: 2018 Fairfax County Existing Land Use Generalized GIS Open Data

\* Includes public, private, and federally owned properties. Public and private acreage has been provided separately; no permanent right-of-way or permanent easements are proposed on federally-owned property, including the GW Parkway. Following conclusion of the Section 4(f) review and the issuance of the NEPA decision document, the NPS is anticipated to issue VDOT a Special Use Permit for any temporary construction impacts. For permanent impacts, a highway easement deed would be executed between FHWA and VDOT in accordance with 23 CFR 107.

\*\* Does not include all properties affected by project. Conversions due to impacts such as permanent utility easements, drainage easements, and temporary construction easements would be identified as designs progress.

FCPA = Fairfax County Park Authority

In accordance with the Uniform Relocation Assistance and Real Property Policies Act of 1970, as amended, affected property owners would be fairly compensated for acquisition of their property. These calculations are preliminary estimates based on GIS data from Fairfax County. The full right-of-way impacts would be determined during final design. Property impacts may be minimized or converted to temporary use as design progresses.

The Build Alternative would provide Express Lanes along I-495 and improvements at the GW Parkway, Georgetown Pike, and Route 267 interchanges, as well as non-motorized transportation connections between adjacent neighborhoods via a shared use path, which would be consistent with the *Fairfax County Transportation Plan* and the *Fairfax County Comprehensive Plan*. The Build Alternative is not anticipated to require relocations or change the overall land use of other parcels, and therefore would be consistent with future land use recommendations of these plans.



### 3.6 ENVIRONMENTAL JUSTICE

Title VI of the Civil Rights Act of 1964, as amended, requires that no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

The FHWA Title VI Program is broader than the Title VI statute and encompasses other nondiscrimination statutes and authorities including Section 162(a) of the Federal-Aid Highway Act of 1973, the Age Discrimination Act of 1975, Section 504 of the Rehabilitation Act of 1973, Americans with Disabilities Act of 1990, Executive Order 13166, and Executive Order 12898 which defines Federal Actions to Address Environmental Justice in Minority and Low-Income Populations (1994). FHWA Order 6640.23A establishes policies and procedures for FHWA to use in complying with Executive Order 12898.

The FHWA EJ Orders define a minority individual as belonging to one of the following groups: Black, Hispanic or Latino, Asian American, American Indian and Alaskan Native, or Native Hawaiian and Other Pacific Islander. A minority population is present when: (a) the minority population of the affected area exceeds 50% of total population or (b) the minority population percentage in the affected area is “meaningfully greater” than the minority population percentage in the general population or other appropriate unit of geographical analysis (CEQ, 1997). In this Revised EA, the lower of the two average minority population percentages of the MWCOG member localities or of Fairfax County was used.

The FHWA EJ Orders define a “low-income” individual as a person whose median household income is at or below the Department of Health and Human Services (HHS) poverty guidelines. A low-income population is defined as a block group for which the median household income is below the most current U.S. Department of Health and Human Services poverty guidelines for the average household size in that block group.

Linguistic isolation, often referred to as Limited English Proficiency (LEP), is characterized in terms of a U.S. Census respondent’s ability to speak English and through identification of households that are “Limited English Speaking Households.” In the I-495 NEXT LEP analysis, populations are characterized as having a higher degree of linguistic isolation when the percentage of people who speak English “less than very well” is higher than 5% based on federal guidance from the U.S. Department of Transportation<sup>2</sup>. LEP is not a federally designated EJ category but is considered in this analysis as another underserved population that may require assistance or special consideration in the environmental analysis for the project.

#### 3.6.1 Existing Conditions

One census block group meets the threshold for minority EJ, with a total minority population of 52.5% compared with the defined threshold of 45.4% for this project (the Fairfax County minority population). This block group is located in the southeast quadrant of the intersection of the Dulles Toll Road (VA-267) and Route 123 and primarily includes: Asian (31%), Hispanic or Latino (11.3%), and Black or African American (6.3%). The other block groups adjacent to the project corridor range in minority percentage between 17.2% and 44.1%.

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<https://www.federalregister.gov/documents/2005/12/14/05-23972/policy-guidance-concerning-recipients-responsibilities-to-limit-ed-english-proficient-lep-persons>

None of the census block groups in the study area met the threshold for low-income EJ populations. For additional information, refer to the *I-495 Revised Socioeconomic and Land Use Technical Report* (VDOT, 2021e).

LEP is analyzed for the combined census block group area encompassing the study area. LEP for the I-495 NEXT project exceeds the threshold for Asian/Pacific-language speakers (6.2% versus a threshold of 5%).

### 3.6.2 Environmental Consequences

#### *No Build Alternative*

The No Build Alternative would not result in any property acquisitions. The minority population identified as meeting the EJ threshold could likely experience the same congested conditions and unreliable travel times as the overall population. Therefore, no disproportionately high and adverse impacts to low-income or minority populations would occur.

#### *Build Alternative*

No residential or commercial relocations would occur under this alternative. The Build Alternative would not result in new fragmentation or isolation of any communities within the study area. The proposed Express Lanes are an extension of the existing Express Lanes system on I-495, and signage would be consistent with the existing interstate signs. Any potential permanent impacts as a result of the project are anticipated to affect all communities equally. Therefore, no disproportionately high and adverse impacts to EJ populations would occur, and no adverse effects on LEP populations are anticipated. The improved transportation mobility for users of the Express Lanes and General Purpose Lanes and reduced congestion that would occur under the Build Alternative would benefit all users of I-495, including the EJ and LEP populations.

Temporary easements for construction are anticipated to be short-term and would not preclude access to or impact use of properties; therefore, potential temporary right-of-way effects during construction would not be disproportionately high and adverse to EJ populations.

### 3.7 HISTORIC PROPERTIES

In accordance with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended, (16 USC §470) and the Advisory Council on Historic Preservation's regulations for compliance with Section 106 (36 Code of Federal Regulations (CFR) §800), the potential effects to the archaeological and architectural resources that are on, eligible for, or potentially eligible for listing on the National Register of Historic Places (NRHP) have been analyzed within the Area of Potential Effects (APE) identified for the I-495 NEXT project.

The APE for direct effects to cultural resources is defined by the LOD. The APE for indirect effects includes tax parcels immediately adjacent to and outside of the direct effects APE and any parcels abutting those parcels, which accommodates a potential change in view resulting from the project. These areas are shown on **Figure 3-21**. The Virginia Department of Historic Resources (VDHR), the State Historic Preservation Office (SHPO) in Virginia, concurred with the definition of the project's APE on March 28, 2019.

### 3.7.1 Archaeological Resources

Within the APE, pedestrian surveys and shovel testing were performed in 2019 in an effort to identify historic archaeological resources. Based on these survey efforts, four archaeological sites were found adjacent to the LOD but would not be impacted by the I-495 NEXT project, and none were found to be within the LOD. The results of the archaeological survey efforts are summarized further in the *Cultural Resources Survey Report* (CHG, 2019).

The SHPO confirmed on April 7, 2020 that none of the archaeological sites found are eligible for the NRHP and no further archaeological fieldwork is necessary.

Following completion of the *Cultural Resources Survey Report* (CHG, 2019), the Maryland State Highway Administration (MSHA) identified four additional archaeological sites within the GW Parkway property (SHA, 2019). One of these sites, the Dead Run Ridges Archaeological District (Site 44FX3922), was determined eligible for the NRHP by the NPS. Although the LOD and study area for the I-495 NEXT project extends within the boundaries of the Dead Run Ridges Archaeological District, none of the archaeological resources that contribute to the NRHP eligibility of the district would be impacted by the project.

### 3.7.2 Architectural Resources

Within the APE, a records review, background research, and visual survey were conducted in 2019 to identify potential historic architectural properties. The architectural survey included reconnaissance level documentation of 58 resources. Three of these resources were previously listed on the NRHP (029-0228, 029-0228-0037, and 029-0466). There were also three previously documented but unevaluated resources (029-0228-0132, 029-5107, and 029-5115). Fifty-two previously undocumented resources were identified as part of the 2019 survey.

Architectural resources that are listed on the NRHP within the APE are discussed below and are shown on **Figure 3-21**. **Table 3-3** summarizes the architectural resources that are either recommended potentially eligible, eligible, or listed on the NRHP within the APE. For additional information, refer to **Section 3.8.1** and the *Cultural Resources Survey Report* (CHG, 2019).

Please note that following completion of the *Cultural Resources Survey Report* (CHG, 2019), the recently surveyed Tysons Corner Mall (029-6464) was found to be within the project's APE for indirect effects. It was concluded by VDHR within their April 7, 2020 letter that although the Tysons Corner Mall is within the project's APE for indirect effects, the project is sufficiently physically distant from the mall as not to alter any qualities that may contribute to the historic character of the resource. Therefore, the Tysons Corner Mall is not included in **Table 3-3** or in **Figure 3-21**, but is shown on Figure 4-11 of the *I-495 Revised Indirect and Cumulative Effects Technical Report* (VDOT, 2021b).



**Table 3-3. Surveyed Resources Within the Architectural APE that are Recommended Potentially Eligible, Eligible for, or Listed on the National Register of Historic Places**

VDHR Number	Resource Name/ Property Address	Year Built	Property Description	Previous Eligibility Determination	Current Eligibility Recommendation
029-0228	George Washington Memorial Parkway	1930-1962	Paved Parkway; Parkway is significant for example of parkway construction and early 1950's and 1960's engineering and transportation innovations, landscape architecture, and historical and commemorative associations with George Washington. <sup>1</sup>	NRHP Listed June 1995; The period of significance for GW Parkway- North is 1930 to 1963, beginning with the commitment of the Federal government to authorize the funding through the Capper-Crampton Act, and ending with completion of the last bridge of the parkway at Dead Run.	NRHP Listed
02-0228-0037	George Washington Memorial Parkway, Intersection with Capital Beltway/ I-495	1962	Curved, one-lane vehicular on-ramp	Non-Contributing structure to an NRHP-listed resource (GW Parkway)	NRHP Listed
029-0228-0132	Potomac Heritage National Scenic Trail	1974	Dirt footpath along the south bank of the Potomac River, completed ca. 1974	Within the boundary of the NRHP-listed GW Parkway, but NRHP status is unevaluated	Non-contributing resource to the GW Parkway as it post-dates the period of significance (1930-1966) for the parkway.

VDHR Number	Resource Name/ Property Address	Year Built	Property Description	Previous Eligibility Determination	Current Eligibility Recommendation
029-046 6	Georgetown Pike / Route 193	1813-1934	Divided lane road connecting the District of Columbia and Dranesville <sup>2</sup>	Virginia's first scenic and historic byway, designated in 1974; NRHP listed in 2012; The 0.53-mile long section of divided lanes within the APE that provides access ramps to I-495 is a non-contributing structure.	NRHP Listed
029-510 7	House, 1010 Spencer Street	1903	House previously documented not visible. Frame, early 20 <sup>th</sup> century chicken houses, corn crib and garage	Previously undocumented	Not Eligible; Not a significant example of an early 20 <sup>th</sup> century farm.
029-511 5	House, 1000 Balls Hill Road	Not Available	This resource has been demolished at the time of survey	Previously undocumented	Not Eligible; Due to being no-longer extant.

\*For the purposes of this discussion, the term non-contributing means that the structure or resource does not contribute to the overall historic significance of the resource. For the GW Parkway and Georgetown Pike (Route 193), the historic significance of the resource refers to the character-defining features that contribute to the eligibility of the resource to the NRHP.

<sup>1</sup> Also an All-American Road

<sup>2</sup> Also Virginia's first Scenic Byway

APE = Area of Potential Effect; GW Parkway = George Washington Memorial Parkway; NRHP = National Register of Historic Places

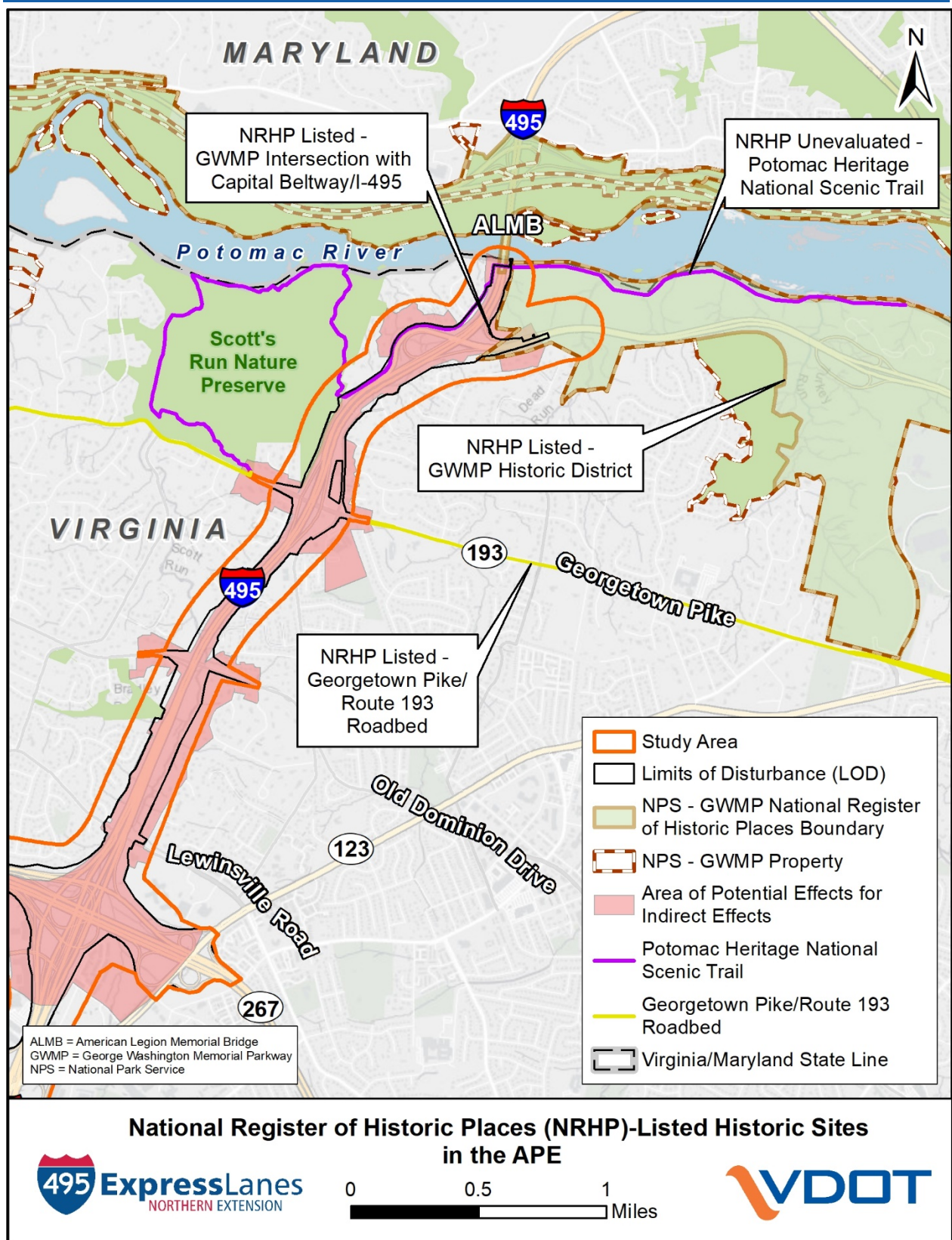


Figure 3-21. National Register of Historic Places-Listed Resources in the APE



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### 3.7.3 Coordination Efforts Between VDOT, NPS and the SHPO

Because the GW Parkway was identified as a historic property as well as a Section 4(f) resource (see **Section 3.8**), the VDOT project team worked closely with the NPS and the SHPO in order to develop a project that considers the setting and feeling of the GW Parkway. The goal behind the I-495 NEXT design is to minimize the visual and physical impacts to the GW Parkway, while incorporating elements of design that creates a gateway entrance to the GW Parkway off I-495. With this in mind, numerous coordination meetings and letters between VDOT, NPS and the SHPO have occurred. The results of those coordination efforts are outlined below:

- 06/25/2018—VDOT sent scoping letters sent to both the SHPO and the NPS.
- 03/17/2019—VDOT sent a letter to the SHPO to coordinate the effect determination for cultural resources that fall within the project's Area of Potential Effect (APE).
- 03/28/2019—The SHPO concurred with the definition of the APE.
- 04/4/2019—Meeting held between VDOT and NPS to introduce the project's initial conceptual design to the NPS.
- 06/24/2019—Meeting held between VDOT and NPS. VDOT presented the traffic sensitivity analysis for the GW Parkway interchange ramps.
- 08/21/2019—Meeting held between VDOT, SHPO, and NPS. VDOT presented potential preliminary signing options for the proposed GW Parkway guide signs and Express Lanes toll pricing signs.
- 10/16/2019—Meeting held between VDOT and the SHPO to provide the SHPO with a status update on the on-going coordination efforts with the NPS.
- 10/21/2019—Meeting held between VDOT and NPS. VDOT presented minimization and mitigation options related to the proposed signage and footprint impacts, by: (1) relocating and consolidating signs with existing and future signage associated with Maryland's project; (2) optimizing alignment and proposed grading elements. VDOT committed to prepare visualizations for NPS review and comment depicting options to reduce the project's footprint and impacts to NPS land.
- 12/12/2019—Meeting held between VDOT and NPS. VDOT presented a revised signage plan and visualizations of three options, which included illustrations of different impacts to tree canopy where the I-495 NEXT project ties into the GW Parkway. NPS requested additional visualizations of these options.
- 01/23/2020—Meeting held between VDOT and NPS. VDOT presented visualizations for the three design concepts that were presented on December 12, 2019. NPS requested two additional visualizations. NPS also requested that a tree survey be conducted where currently I-495 currently ties into the existing eastbound GW Parkway lanes.
- 02/06/2020—Meeting held between VDOT, SHPO and NPS. The VDOT project team presented a package of signage plans and visualizations, including a fourth option that partially removes vegetation on NPS property to accommodate a wall that is smaller in scale than what is included in

previous options. This information was summarized in the *George Washington Memorial Parkway Visualization Booklet* (henceforth referenced as the *February 2020 Visualization Booklet*) (see Appendix A). The *February 2020 Visualization Booklet* addressed the NPS's desire for a clear gateway to the GW Parkway, proposed directional signage to I-495 from the GW Parkway, and the merging of the Express Lanes and GP lanes from I-495 from the south onto the GW Parkway. VDOT maintained that the design options presented in the *February 2020 Visualization Booklet* minimized the effect of the I-495 NEXT project to the GW Parkway.

The *February 2020 Visualization Booklet* outlined four gateway options for traffic traveling from the Express Lanes and GP lanes from I-495 onto the GW Parkway. Three of the options involve the construction of a stone-faced wall, while one option proposes an alternation by laying back the slope to the south of the GW Parkway (Option 1).

- 03/17/2020—VDOT sent a letter to the SHPO to coordinate the effect determination for cultural resources that fall within the project's Area of Potential Effects (APE).
- 04/07/2020—In response to VDOT's March 17, 2020 letter, SHPO sent a letter that expressed their preference for Option 1, the option that proposed to lay back the slope to the south of the GW Parkway, versus the other three options presented in the *February 2020 Visualization Booklet*. The SHPO maintained that Option 1 is the preferred option because it would not result in the introduction of new features on the landscape. However, the SHPO withheld their decision on a final effect concurrence for the project in order to give the NPS an opportunity to review and comment on the four design options presented in the *February 2020 Visualization Booklet*.
- 04/08/2020—SHPO sent an additional letter that expanded their position from their April 7, 2020 letter related to possible effects on historic properties within the APE resulting from the selection of Option 1 as the preferred option. SHPO stated that in their letter dated April 7, 2020 that they believe of the four design options presented in the *February 2020 Visualization Booklet* that Option 1 as presently presented would have the least impact on the GW Parkway. SHPO further stated that if the NPS selects Option 1 to move to construction, the undertaking would likely have a "No Adverse Effect" on the GW Parkway. SHPO concluded the letter by stating that if one of the other proposed options is selected additional consultation with the SHPO on the project's effect would become necessary.
- 04/29/2020—In response to VDOT's March 17, 2020 Letter, VDOT received a response letter from the NPS stating that the agency agreed with VDOT's "No Adverse Effect" determination for the I-495 NEXT project provided that VDOT moved forward with Option 1 from the *February 2020 Visualization Booklet*, further minimizes loss of forest, and mitigates the loss of forest. VDOT shall minimize, to the extent practicable, the amount of forest and vegetation removal deemed necessary to implement Option 1 and shall mitigate for forest removal on land within GW Parkway and land within VDOT right-of-way adjacent to the GW Parkway that transitions to the park entrance.
- 10/05/2020—In response to the EA, the NPS concurred via letter with VDOT's "No Adverse Effect" determination provided that Option 1 from the *February 2020 Visualization Booklet* is implemented and VDOT further minimize loss of forest and mitigate for loss of forest in the vicinity where I-495 connects with the GW Parkway. Further, the NPS recommended that wall treatments on VDOT property complement existing walls and architecture along the GW Parkway.

- 01/14/2021—VDOT sent a letter to the SHPO to coordinate an effects determination for the cultural resources that fall within the APE for the I-495 NEXT project. Within the letter, VDOT provided a project overview, assessment of effect, and a determination of effect. In this letter, VDOT stated that they have determined the I-495 NEXT project would have “No Adverse Effect” on historic properties in accordance with 36 CFR 800.5(b), provided that conditions are imposed and implemented to avoid adverse effects on the GW Parkway and the Dead Run Ridges Archaeological District as well as its contributing archaeological sites.
- 01/19/2021— Meeting held between VDOT and the NPS to discuss comments received from the NPS on the *February 2020 I-495 NEXT Environmental Assessment*.
- 01/21/2021—The SHPO concurred via letter with VDOT’s “No Adverse Effect” determination provided that Option 1 from the *February 2020 Visualization Booklet* is implemented along with the other conditions highlighted in the “*Efforts to Minimize Harm and Mitigate Impacts Section*” below.
- 01/27/2021—VDOT sent an email informing the SHPO of FHWA’s intention to make a Section 4(f) *De minimis* finding based on the “No Adverse Effect” determination that was received for the GW Parkway as it is an NRHP listed property.
- 01/28/2021 — The SHPO sent an email acknowledging receipt of VDOT’s January 27, 2021 email.

Copies of the letters referenced above between VDOT, SHPO and the NPS can be found in the *I-495 Revised Section 4(f) and 6(f) Technical Memorandum* (VDOT, 2021d) in **Appendix A**.

#### 3.7.4 Section 106

Pursuant to Section 106 of the National Historic Preservation Act (54 United States Code (U.S.C.) §306108) (NHPA), VDOT and FHWA initiated a process of identifying consulting parties on this project. The consulting parties were invited to participate in the process to identify historic properties, evaluate project effects on those properties, and identify measures to avoid, minimize, and mitigate adverse effects to the properties. A final determination of effects will be made prior to the FHWA NEPA decision. If adverse effects to historic properties are identified, a Memorandum of Agreement or Programmatic Agreement would be executed.

The following entities were invited to be consulting parties (those agencies marked in italics below accepted the invitation to participate in consultation for the I-495 NEXT project):

- Chickahominy Tribe
- Chickahominy Tribe Eastern Division
- City of Fairfax City Manager, Robert Stalzer
- Delaware Nation
- Fairfax County Executive
- *Fairfax County History Commission*
- *George Washington Memorial Parkway Superintendent, Charles Cuvelier*
- Historic Fairfax City, Inc.
- *Maryland State Highway, Steve Archer*
- Monacan Indian Nation



- Nansemond
- National Park Service, National Capital Region, Tammy Stidham
- Pamunkey
- Rappahannock Tribe
- Upper Mattaponi
- Virginia Department of Historic Resources

### 3.7.5 Environmental Consequences

#### *No Build Alternative*

The No Build Alternative would not have any effect on historic resources. An additional evaluation of the study area's cultural resources may be required if any programmed improvements under the No Build Alternative involve major new construction with federal funding. These effects would be addressed by the respective project sponsors.

#### *Build Alternative*

In accordance with 36 CFR §800.5(a), VDOT has applied the criteria of adverse effect to historic properties within the project's APE. The regulations implementing Section 106 of the NHPA of 1966, as amended, define an effect as an "alteration to the characteristics of a historic property qualifying it for inclusion in or eligible for the National Register" (36 CFR §800.16(i)). The effect is adverse when the alteration of a qualifying characteristic occurs in a "manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling or association" (36 CFR 800.5(a)). Based on the preliminary design, VDOT has determined that the Build Alternative would have no adverse effect on historic properties.

On January 21, 2021, the SHPO concurred with VDOT's "No Adverse Effect" Determination (see **Section 3.7.3**) provided that Option 1 from the *February 2020 Visualization Booklet* is implemented along with the other conditions highlighted in the "**Efforts to Minimize Harm and Mitigate Impacts Section**" below.

#### *Efforts to Minimize Harm and Mitigate Impacts*

Based on on-going coordination efforts with the NPS and the SHPO, the following measures to minimize harm and mitigate impacts to the GW Parkway have been identified. These conditions were agreed upon by VDOT and the SHPO on January 21, 2021:

- VDOT shall include design constraints in the Request for Proposals requiring the Design-Build contractor to remain within the current LOD where possible in designing and constructing project improvements in the vicinity of Archaeological Sites 44FX0374, 44FX0379, 44FX0389, and 44FX2430. VDOT shall ensure that the Concessionaire (Design-Build contractor) includes a Special Provision in the contract requiring that safety fencing is erected along the LOD to ensure avoidance of any ground disturbance to Sites 44FX0374, 44FX0379, 44FX0389, or 44FX2430 during construction of the project, or by construction vehicles entering and leaving the project corridor.
- VDOT shall implement Option 1 as presented in the *February 2020 Visualization Booklet* and selected by the SHPO and the NPS as the preferred option for the I-495 NEXT project.

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- VDOT shall construct any infrastructure associated with the NPS-selected gateway Option 1 in accordance with NPS specifications. VDOT does not propose constructing any walls on NPS lands in Option 1 as part of the Build Alternative. Any shoulder wall infrastructure (e.g., retaining walls) within VDOT ROW that is in the transition area immediately adjacent to the GW Parkway property will be compatible with and complementary to the GW Parkway stone wall character.
  - VDOT shall install any necessary plantings on NPS lands associated with the NPS-selected gateway option in accordance with NPS specifications.
  - VDOT shall minimize the amount of forest removal and mitigate for forest removal deemed necessary to implement Option 1.
  - VDOT shall coordinate with NPS regarding the design and location of the signage to be installed within the GW Parkway for the I-495 NEXT project.
  - VDOT shall consult with the GW Parkway and the SHPO at major milestones in project design to ensure the design remains consistent with these conditions to avoid adverse effects on the GW Parkway.
  - On-going design minimization efforts to reduce the project's physical project footprint and impervious surface area within the GW Parkway boundary.
  - Continued collaboration with the NPS on potential enhancements to the visitor's "sense of arrival" including potentially relocating the GW Parkway entrance sign to a more prominently visible location within the park.
  - Preparation of several preliminary design concepts and viewshed visualizations of potential projects impacts at the park boundary interface. This information was provided to the NPS in meetings on December 12, 2019 and January 23, 2019 and refined for submittal on February 6, 2020; the potential concepts and visualizations are included for review in Appendix A of this document.
  - Completion of a tree survey in the vicinity of the eastbound GW Parkway lanes, with a commitment to minimize impacts to mature and healthy trees, and to restore vegetation disturbed by construction (including the use of native seed mix and re-planting of trees per NPS's tree replacement ratio of 1:1).
  - On-going efforts to consolidate/reduce existing I-495 guide signage within the westbound lanes of the GW Parkway.
  - Replacement of guide signing for the GW Parkway on the Capital Beltway to include new sign elements with brown backgrounds.
  - Location of the Virginia toll signing outside of the park boundary.

### 3.8 SECTION 4(F)

Under the provisions of Section 4(f) of the U.S. Department of Transportation Act of 1966 (49 USC §303 I), FHWA may approve the use of land from publicly owned parks or recreation areas, publicly owned wildlife or waterfowl refuges, or historic sites that are listed in, or eligible for listing in, the NRHP for federal-aid highway projects if it determines that there is no feasible and prudent avoidance alternative and

the action includes all possible planning to minimize harm to the property. FHWA also may approve the use of land from such properties if it determines that that use of the property, including any measure(s) to minimize harm (such as any avoidance, minimization, mitigation, or enhancement measures) committed to by the applicant would have a *de minimis* impact, as identified in 23 CFR §774.17, on the property. A “use” of a Section 4(f) property occurs:

- (1) when land is permanently incorporated into a transportation facility;
- (2) when there is a temporary occupancy of land that is adverse in terms of the statute’s preservation purpose; or
- (3) when there is a constructive use of a Section 4(f) property.

### 3.8.1 Existing Conditions

Eight Section 4(f) properties have been identified in the study area associated with the I-495 NEXT project, and are summarized in the text below. These sites are listed on **Table 3-4**, and the historic architecture sites are shown on **Figure 3-22**.

- **George Washington Memorial Parkway**—The GW Parkway and its associated parks and trails are owned by the United States and administered by the NPS and total 7,600 acres in size. The GW Parkway was originally set aside by Congress as a “comprehensive park, parkway, and playground system of the National Capital” (NPS, 2019). The GMWP was listed on the NRHP in June 1995 under the Multiple Property documentation “Parkways of the National Capital Region, 1913 to 1965.” The GW Parkway is noteworthy for its example of parkway construction and early 1950’s and 1960’s engineering and transportation innovations, landscape architecture, dramatic drive characterized by gentle curves and rolling forested hills and bluffs, views to the Potomac River Gorge, rustic stone masonry guardwalls, and historical and commemorative associations with George Washington. The GW Parkway was designed to lie lightly on the land, with the utmost care given to the preservation of the Potomac Palisades, the Potomac River Gorge, and various runs and ravines that drain into the Potomac River.

The Potomac Gorge can also be found within the boundaries of the GW Parkway. The entire Potomac Gorge is a 15-mile river shoreline of public parkland that is documented as one the country’s most biologically diverse areas with over 1,400 plant species identified and at least 30 distinct vegetation communities. The Potomac Gorge is also known for its unique geology as rainwater from an 11,500 square mile area upstream is funneled through a constricted passageway, where plants have adapted the ability to survive in the face of intense flood scouring (The Nature Conservancy, 2005). The Potomac Gorge has been identified as a Section 4(f) resource as part of the GW Parkway.

- **Scott’s Run Nature Preserve**—Scott’s Run Nature Preserve is a 336-acre preserve located in McLean, north of Georgetown Pike and west of the I-495 corridor. The Preserve is operated by the FCPA and is a publicly owned and publicly accessible recreational area.
- **Georgetown Pike / Route 193**—A portion of the Georgetown Pike (Route 193) roadbed is listed on the NRHP.
- **McLean Hamlet Park**—McLean Hamlet Park is an 18-acre neighborhood park that is owned and maintained by the FCPA.



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- **Potomac Heritage National Scenic Trail**—The Potomac Heritage National Scenic Trail (Potomac Heritage Trail) is an approximately 830-mile network of locally managed trails on both sides of the Potomac River between its mouth at the Chesapeake Bay and the Allegheny Highlands in the upper Ohio River Basin. The evolving Potomac Heritage Trail network is managed by various governmental agencies and nonprofit organizations. This trail network’s primary purpose is non-motorized recreation.
  - **Scotts Run Trail\***—The FCPA has also acquired an easement within The Preserve at Scotts Run Homeowners Association parcel for the future “Scotts Run Trail” as identified on Fairfax County’s Trail Buddy website (Fairfax County, 2020b).

*\*Please note that the Scotts Run Trail falls within the boundary of a privately owned conservation easement. Approximately 7.69 acres of the conservation easement is within the study area with 7.56 of those acres encompassed within the LOD. Due to the conservation easement being privately owned, it is not subject to Section 4(f).*

- **Timberly Park**—Timberly Park, owned and maintained by FCPA, is a 23-acre community park located in McLean, west of I-495 and south of Old Dominion Drive.
- **Dead Run Ridges Archaeological District**—The Dead Run Ridges Archaeological District (Site 44FX3922) is located within GW Parkway property. In September 2020, NPS concurred with the MSHA that the Dead Run Ridges Archaeological District is eligible for the NRHP. Although the LOD and study area for the I-495 NEXT project extends within the boundaries of the Dead Run Ridges Archaeological District, none of the archaeological resources that contribute to the NRHP eligibility of the district would be impacted by the project. Please note that due to the sensitivity of this resource, the location is not shown on **Figure 3-22**.

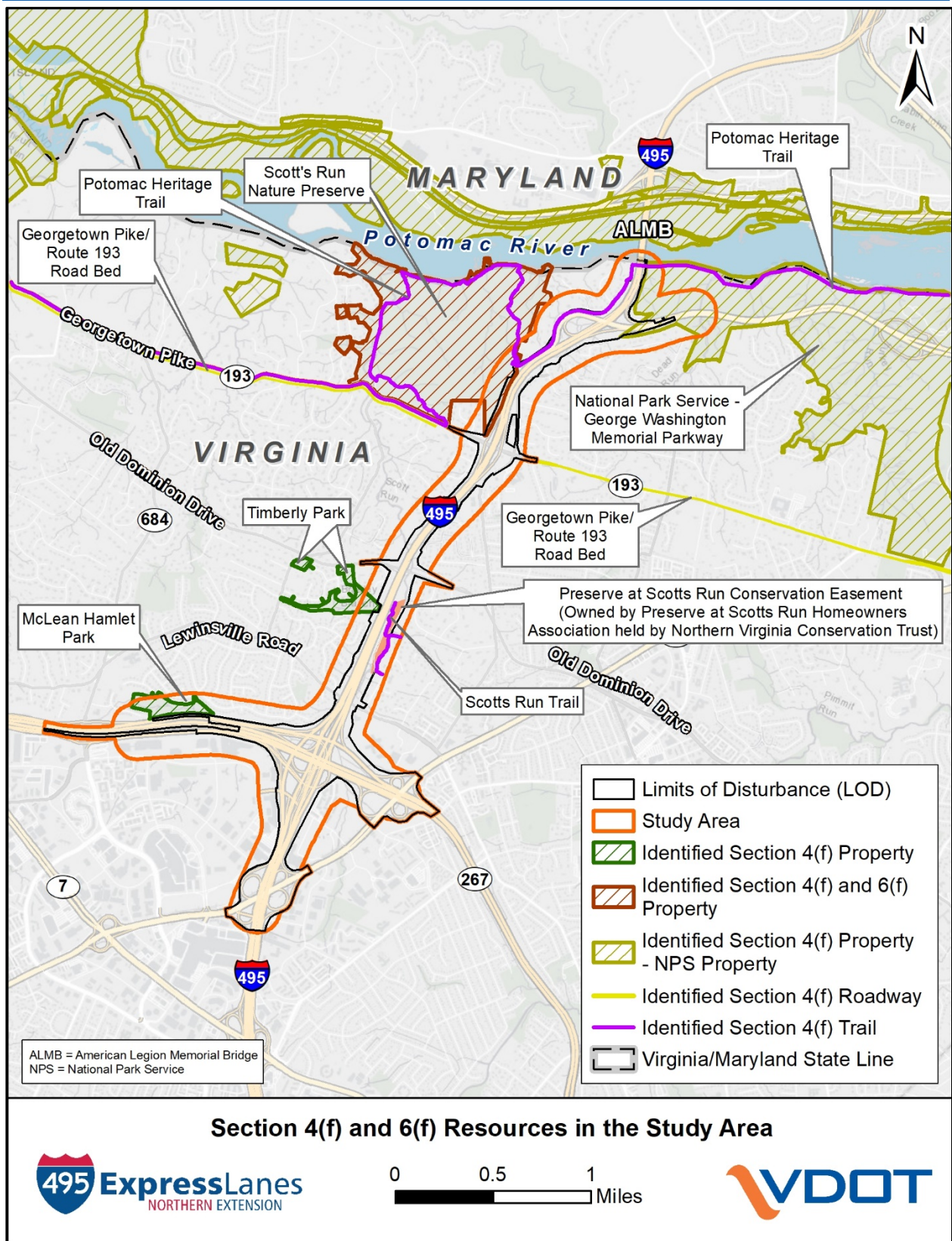


Figure 3-22. Section 4(f) and 6(f) Resources in the Study Area

**Table 3-4. Identified Potential Section 4(f) Properties Within the Study Area**

Identified Section 4(f) Properties within the Study Area	Official with Jurisdiction	Type of Facility
George Washington Memorial Parkway	National Park Service and Virginia Department of Historic Resources	NRHP Listed – Historic Property Recreation Area- Scenic Recreational Driving, Parks, Athletic Fields, Wildlife Viewing, Scenic Views of the Potomac River, Potomac Gorge and the Potomac Palisades
Potomac Heritage National Scenic Trail	Various Government and Non-Profit Organizations	Trail
Scott’s Run Nature Preserve	Fairfax County Park Authority	Regional Park
Scotts Run Trail	Fairfax County Park Authority	Trail
Georgetown Pike / Route 193	Virginia Department of Historic Resources	NRHP Listed – Historic Property
McLean Hamlet Park	Fairfax County Park Authority	Local Park
Timberly Park	Fairfax County Park Authority	Local Park
Dead Run Ridges Archaeological District	National Park Service and Virginia Department of Historic Resources	NRHP Eligible – Historic Property

Source: Fairfax County Property Map, 2018; VDHR V-CRIS GIS Data, 2018

<sup>1</sup> Also an All-American Road

NRHP = National Register of Historic Places

### 3.8.2 Environmental Consequences

#### ***No Build Alternative***

The No-Build Alternative requires no right-of-way acquisition and has no direct adverse impacts to any Section 4(f) protected properties. Therefore, there would be no use of Section 4(f) properties.

#### ***Build Alternative***

The Build Alternative would potentially require the use of land from both the GW Parkway and the Scott’s Run Nature Preserve (see **Table 3-5**). The *I-495 Revised Section 4(f) and 6(f) Technical Memorandum* (VDOT, 2021d) in **Appendix A** contains more detailed information on the other potential Section 4(f) properties, the properties that are potentially impacted, the potential impacts, coordination efforts between agencies, and avoidance and minimization measures.

The public and the Officials with Jurisdiction (OWJ) over both the Scott’s Run Nature Preserve (FCPA) and the GW Parkway (NPS and the SHPO) have been notified of FHWA’s intention to make a *de minimis* impact determination with respect to the Build Alternative’s use of land from both the GW Parkway and



Scott’s Run Nature Preserve. NPS and FCPA provided their concurrence with the *de minimis* impact determination on May 6, 2021 and May 17, 2021 respectively (see **Appendix D**).

**Table 3-5. Impacted Section 4(f) Properties Within the LOD**

Impacted Section 4(f) Property	Type of Section 4(f) Property	Total Size of Section 4(f) Property within Study Area (acres)	Permanent Impact Amount within LOD (acres)	Temporary Easement Amount within LOD (acres)
George Washington Memorial Parkway	Historic Property and Recreation Area	60	0.9	1.3
Scott’s Run Nature Preserve	Recreation Area	25	1.10	3.01

Note: Following conclusion of the Section 4(f) review and the issuance of the NEPA decision document, the NPS is anticipated to issue VDOT a Special Use Permit for any temporary construction impacts within the GW Parkway. For permanent impacts, a Highway Easement Deed would be executed between FHWA and VDOT in accordance with 23 CFR 107.

Source: Fairfax County Property Map, 2018; VDHR V-CRIS GIS Data, 2018

LOD = Limits of Disturbance

**3.8.3 Trails and Bike Facilities within the Study Area**

Section 4(f) does not apply to trails, paths, bikeways, and sidewalks (see 23 CFR 774.13(f)(3)(4)) that occupy a transportation right-of-way without limitation to any specific location within the right-of-way, so long as the continuity of the trail, path, bikeway, or sidewalk is maintained, or these facilities are part of the local transportation system which function primarily for transportation.

A full list of trails and bicycle/pedestrian facilities is in **Section 3.2.2**. Since the portions of these facilities within the study area are located within the transportation right-of-way, as there is no known easement (or other instrument) requiring the facilities to be in their specific location and the existing continuity and use of the trails would be maintained, the aforementioned provision is applicable with respect to the permanent impacts. Additionally, as these facilities would remain open and operational during construction, the provision is also applicable to any temporary (construction) impacts related to the proposed action. VDOT maintains safe pedestrian access where it currently exists on roadway projects, and project-specific maintenance of traffic plans would be developed accordingly.

**3.9 SECTION 6(F)**

The Land and Water Conservation Fund Act of 1965 (Public Law 88-578) was enacted to preserve, develop, and assure accessibility to outdoor recreation resources by:

- Providing funds for and authorizing federal assistance to the states in planning, acquisition, and development of needed land and water areas and facilities, and

- Providing funds for the federal acquisition and development of certain lands and other areas.

The Act authorized the establishment of the Land and Water Conservation Fund (LWCF) which is funded by the revenue from fees paid to the federal government for offshore drilling, surplus property sales, motorboat fuels tax, and other revenues. The program is administered by the NPS through regulations 36 CFR 59.

Section 6(f) (as codified under 36 CFR 59.3) prohibits the conversion of property acquired or developed with grants from this fund to a non-recreational purpose without the approval of the NPS. The NPS can approve such conversion only if it is in accordance with the existing comprehensive statewide outdoor recreation plan and only upon such conditions as deemed necessary to “assure the substitution of other recreational properties of at least equal fair market value and of reasonably equivalent usefulness and location” (36 CFR 59.3). Protection of lands under Section 6(f) includes all parks and other sites that have been the subject of LWCF grants to states and localities whether for acquisition of parkland, development, or rehabilitation of facilities.

The Section 6(f) conversion process is conducted jointly by the Virginia Department of Environment and Conservation (VDCR) and the NPS following the completion of the NEPA process. Information on Section 6(f) resources in Fairfax County was obtained by contacting the FCPA.

### 3.9.1 Existing Conditions

The Scott’s Run Nature Preserve was developed with money from the LWCF. Therefore, the Preserve is afforded additional protection under Section 6(f) of the Act.

### 3.9.2 Environmental Consequences

#### *No Build Alternative*

The No Build Alternative requires no right-of-way acquisition and has no direct adverse impacts to any Section 6(f) resources.

#### *Build Alternative*

Under the Build Alternative, a conversion of Section 6(f) land is anticipated to occur as a result of construction of the I-495 NEXT project. The estimated impact of approximately 4.11 acres of the Scott’s Run Nature Preserve is a worst-case estimate based on best available design information (see **Figure 3-23**). Of the 4.11 acres of the Scott’s Run Nature Preserve within the LOD, approximately 3.01 acres of land would be subject to a temporary conversion to a non-recreational use lasting less than six months. The remaining 1.10 acres of the Scott’s Run Nature Preserve within the LOD would be a permanent incorporation of recreational land to a transportation use and would require replacement in accordance with Section 6(f).

Land that would be permanently converted from the Scott’s Run Nature Preserve abuts existing I-495 right-of-way and is currently wooded with no pedestrian or recreational use. Therefore, no changes to the current trail network configuration within the Preserve are anticipated. Minor changes in noise levels and visual quality could occur. Access to the Preserve would not be impacted by the Build Alternative and would remain as it currently exists.

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During early coordination efforts, as well as on-going Section 4(f) coordination activities, the FCPA noted that the Scott's Run Nature Preserve was acquired and developed with assistance from the LWCF and requested that VDOT facilitate the identification of Section 6(f) replacement land. A search of available replacement land near the existing Scott's Run Nature Preserve has been conducted to identify Section 6(f) replacement property.

The *I-495 Revised Section 4(f) and 6(f) Technical Memorandum* (VDOT, 2021d) in **Appendix A** contains more detailed information on Section 6(f) impacts and the on-going coordination efforts between VDOT, FCPA, VDCR and the NPS. Potential replacement land has been identified at the corner of Balls Hill Road and Georgetown Pike and is approximately 1.48 acres in size. Currently, the parcel is owned by VDOT, used as an unpaved maintenance staging area with access provided from Balls Hill Road. VDOT proposes to transfer ownership of the parcel to the FCPA for future use as additional parking for individuals visiting the Scott's Run Nature Preserve. The construction of improvements to create a parking lot and supporting infrastructure (drainage, sidewalks, etc.) on the proposed parcel is excluded from the project and would be performed by others. Sidewalk connections along Georgetown Pike, proposed as part of the Build Alternative, would connect the parking lot directly to the Scott's Run Nature Preserve east entrance.

Prior to the transfer of ownership from VDOT to the FCPA, VDCR and NPS must both agree that the replacement land is adequate for permanent impacts related to the Scott's Run Nature Preserve. This process is on-going and would be completed following an FHWA NEPA decision.



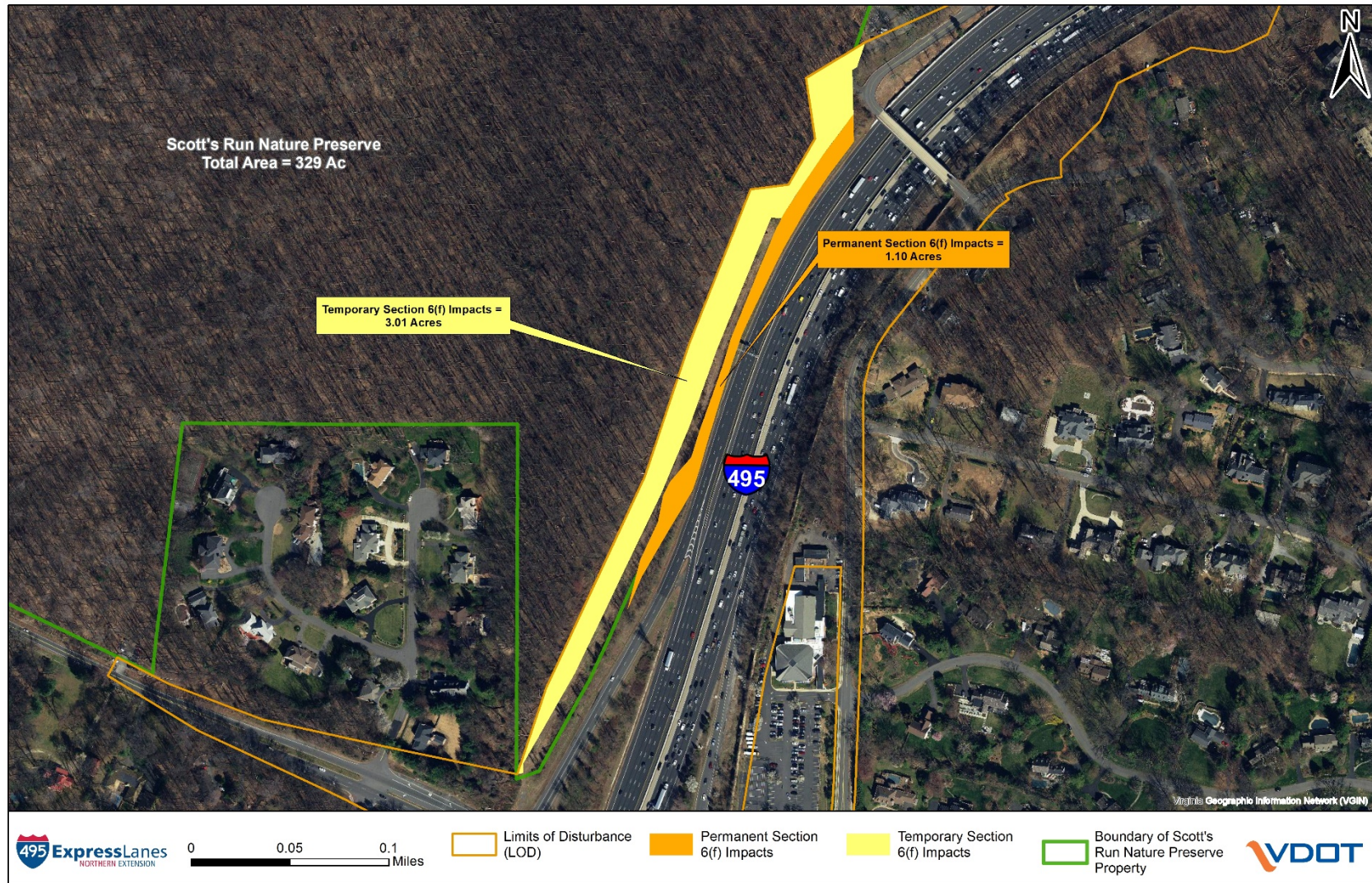


Figure 3-23. Section 6(f) Impacts Related to the Scott's Run Nature Preserve



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### 3.10 AIR QUALITY

Under NEPA, federal agencies must consider the effects of their decisions on the environment before making any decisions that commit resources to the implementation of those decisions. Changes in air quality, and the effects of such changes on human health and welfare, are among the effects to be considered. A project-level air quality analysis is performed to assess the potential air quality impacts of the project, document the findings of the analysis, and make the findings available for review by the public and decision-makers.

Pursuant to the Federal Clean Air Act of 1970 (CAA), the USEPA is required to set National Ambient Air Quality Standards (NAAQS) for pollutants considered harmful to public health and welfare. Federal actions must not cause or contribute to any new violation of any standard, increase the frequency or severity of any existing violation, or delay timely attainment of any standard or required interim milestone. USEPA designates geographic regions that do not meet the NAAQS for one or more criteria pollutants as “non-attainment areas”. Areas previously designated as non-attainment, but subsequently re-designated to attainment because they no longer violate the NAAQS, are reclassified as “maintenance areas” subject to maintenance plans to be developed and included in a state’s SIP.

Changes in air quality, and the effects of such changes on human health and welfare, are among the effects to be considered in an environmental assessment. A project-level air quality assessment of the I-495 NEXT project indicates the project would meet all applicable air quality requirements of NEPA and federal and state transportation conformity regulations. As such, the project would not cause or contribute to a new violation, increase the frequency or severity of any violation, or delay timely attainment of the NAAQS established by the USEPA. The methodologies and findings for the air quality analysis are summarized below and described in detail in the *I-495 Revised Air Quality Technical Report (2021a)*.

#### 3.10.1 Existing Conditions

The Virginia Department of Environmental Quality (VDEQ) provides general comments in regard to ambient air quality issues, and for the jurisdiction in which the project is located (Fairfax County) it states the following:

*This project is located within a Marginal 8-hour Ozone Nonattainment area, and a volatile organic compounds (VOC) and nitrogen oxides (NOx) Emissions Control Area. As such, all reasonable precautions should be taken to limit the emissions of VOC and Nox. In addition, the following VDEQ air pollution regulations must be adhered to during the construction of this project: 9 Virginia Administrative Code (VAC) 5-130, Open Burning restrictions; 9 VAC 5-45, Article 7, Cutback Asphalt restrictions; and 9 VAC 5-50, Article 1, Fugitive Dust precautions.*

Due to this project’s location within the Washington DC, Maryland, and Virginia Marginal 8-Hour Ozone non-attainment area, federal and state transportation conformity requirements apply. Otherwise, the region is classified as attainment for all other NAAQS, with any former maintenance requirements having either been fulfilled or revoked.

### 3.10.2 Environmental Consequences

#### Project Status in the Regional Transportation Plan and Program:

40 CFR Part 93 Subpart A stipulates the Federal conformity requirements, including specifically 40 CFR 93.114<sup>3</sup> (which requires a currently conforming transportation plan and program at the time of project approval) and 40 CFR 93.115<sup>4</sup> (which requires the project to be from a conforming plan and program), apply as the area in which the project is located is designated as nonattainment for ozone. Accordingly, there must be a currently conforming transportation plan and program at the time of project approval, and the project must come from a conforming plan and program (or otherwise meet criteria specified in 40 CFR 93.109(b))<sup>5</sup>. As of the date of preparation of this analysis, the project was included in the currently conforming Visualize 2045 Long Range Transportation Plan (LRTP) and fiscal year (FY) 2019-2024 Virginia Transportation Improvement Program (TIP). The LRTP and TIP are developed by the National Capital Region Transportation Planning Board (NC RTPB), whose members include VDOT<sup>6</sup>.

Since the approval of the LRTP and TIP, VDOT has proposed changes to the project. To ensure that these changes would have no impact on the conformity finding, NC RTPB performed a sensitivity analysis that they documented in a June 30, 2019 letter to VDOT<sup>7</sup>. Based on the results of the sensitivity analysis, NC RTPB drew the following conclusions<sup>8</sup>:

*“Since the analysis shows that the proposed changes to the project would (1) result in non-substantive amount of change in regional emissions; (2) result in decreased emissions; and (3) result in emissions that are within the mobile budgets for the 2025 forecast year, we believe it is reasonable to conclude that the pollutant levels for other forecasts years (2030, 2040 and 2045) will also be within the mobile budgets.”*

These and other regional changes were included in the updated air quality conformity analysis of the 2020 Amendment to the Visualize 2045 Plan and the FY2021-2024 TIP. The 2020 amendments to the Visualize 2045 Plan and the FY2021-2024 TIP included changes to better represent the proposed project in its final form and were approved at the March 18, 2020 M WCOG Transportation Planning Board meeting. The analysis demonstrated that the incremental impact of the Build Alternative on mobile source emissions, when added to the emissions from other past, present, and reasonably foreseeable future actions,

<sup>3</sup> See: <https://www.gpo.gov/fdsys/pkg/CFR-2014-title40-vol20/xml/CFR-2014-title40-vol20-sec93-114.xml>

<sup>4</sup> See: <https://www.gpo.gov/fdsys/pkg/CFR-2014-title40-vol20/xml/CFR-2014-title40-vol20-sec93-115.xml>

<sup>5</sup> See: <https://www.gpo.gov/fdsys/pkg/CFR-2014-title40-vol20/xml/CFR-2014-title40-vol20-sec93-109.xml>

<sup>6</sup> See: <http://www.mwcog.org/transportation/tpb/>.

<sup>7</sup> Letter from Kanathur Srikanth, Director, Department of Transportation Planning, Metropolitan Washington Council of Governments to Norman Whitaker, Transportation Planning Director, VDOT Northern Virginia District, June 30, 2019. See: [https://www.mwcog.org/events/2019/?F\\_committee=194](https://www.mwcog.org/events/2019/?F_committee=194), July Item 3 Letter, or <https://www.mwcog.org/file.aspx?&A=aG2FDR8gA2Pj7stqM1MdqSjsI3CpsnEBd9V1uocMps%3d>

<sup>8</sup> These results may also be considered to support application of 40 CFR 93.122(g), “Reliance on previous emissions analysis” for regional conformity demonstrations, given that the modeled de minimis changes in emissions (of 0.0%, as reported in the June 30, 2019 NC RTPB letter) by definition may be considered to be not significant.



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is in conformance with the State Implementation (Air Quality) Plan (SIP) and would not cause or contribute to a new violation, increase the frequency or severity of any violation, or delay timely attainment of the National Ambient Air Quality Standards established by the USEPA.

### **Carbon Monoxide (CO)**

A worst-case modeling approach was applied throughout this analysis including the project-level CO air quality assessment. This very conservative approach by design uses worst-case assumptions for modeling inputs so that the results (modeling estimates for emissions and ambient concentrations) will be significantly worse than (i.e., in excess of) what may reasonably be expected for the project. If the applicable NAAQS for CO are still met despite the worst-case modeling assumptions, then there is a high level of confidence that the potential for air quality impacts from the project would be minimal.

All modeling conducted for this project was consistent with applicable federal requirements and guidance as well as the VDOT Project-Level Air Quality Resource Document. USEPA guidance, which is more detailed and technically only required for conformity applications, was also applied for this project for purposes of increased transparency.

Given the downward trend in CO emission from mobile sources, it was ascertained that the year of highest emissions in the project area would be the opening year of the project, 2023. However, the traffic forecasting and operational analysis was done for 2025. This was done deliberately to allow three years for adoption of the Express Lanes to ramp-up, a phenomenon previously observed on similar projects within the Commonwealth.

Using FHWA recommended procedures, three intersections were identified as most likely to have the highest CO concentrations. Since this project is primarily a freeway project, an additional analysis was done for the highest volume interchange within the project limits. The locations evaluated were as follows:

- The intersection of Route 123 and Tysons Boulevard
- The intersection of Route 123 and Capital One Tower Drive/ Old Meadow Road
- The intersection of Route 123 and Scotts Crossing Boulevard/ Colshire Drive
- The interchange of I-495 and Dulles Toll Road (SR 267)

Emission rates were developed using Motor Vehicle Emission Simulator (MOVES) 2014b and input files from the latest conformity determination at the time of the analysis. The opening year of the project (2023) was not an analysis year for the conformity determination and accurate input files for 2023 specifically could not be easily generated. As CO emission rates will trend significantly downward in the coming years, it was decided to develop emission rates using already assembled MOVES input data for 2021. Emissions and ambient concentrations drop significantly over time (through the opening and design years) due to continued fleet turnover to vehicles constructed to more stringent emission standards. Rather than using forecasted traffic volumes, the theoretical maximum volume of 1,230 vehicles/hour/lane for the arterial roadways and 2,400 vehicles/hour/lane for freeways were used, far exceeding the volume that the any location would realistically experience in any analysis year. These are the most prominent worst-case assumptions used in the analysis. Additional worst-case assumptions are documented in full in the *I-495 Revised Air Quality Technical Report* (VDOT, 2021a).

The Air Quality modeling (dispersion modeling) of CO concentrations was performed using USEPA's CAL3QHC model. In all scenarios, forecast peak concentrations for CO are well below the respective one- and eight-hour NAAQS of 35 and 9 ppm respectively.

### Mobile Source Air Toxics (MSAT)

FHWA most recently updated its guidance for the assessment of MSATs in the NEPA process for highway projects in 2016. The updated guidance states that "EPA identified nine compounds with significant contributions from mobile sources that are among the national and regional-scale cancer risk drivers or contributors and non-cancer hazard contributors from the 2011 National Air Toxics Assessment (NATA)."

This project is best characterized as one with "higher potential MSAT effects" as defined in the FHWA guidance since projected design year traffic is expected to exceed the 140,000 to 150,000 Average Annual Daily Traffic (AADT) criteria. Specifically, the 2025 Build scenario is expected to have combined traffic volumes on the I-495 general purpose and Express Lanes reaching 189,600 Annual Daily Traffic (ADT) at the southern project boundary to as high as 261,400 ADT just south of the American Legion Bridge. As a result, a quantitative assessment of MSAT emissions was conducted consistent with FHWA guidance.

The MSAT analysis pivoted off the regional travel demand modeling performed for project which included traffic forecasts for the 2018 base year, 2025 "opening year" No Build and Build alternatives, and 2045 design year No Build and Build alternatives. Similar to the CO analysis, the assumed opening year of the project was 2023, but modeling was done for 2025 to allow for a ramp-up period. The combination of the higher 2025 traffic volumes with the higher 2021 MOVES 2014b emission rates yielded conservative (high) estimate of total MSAT emissions.

Total emissions were calculated using the links identified as the "affected network" for the project. FHWA in their NEPA training materials recommends the following criteria for identifying the extent of the affected network:

- The affected network is based on traffic projections for the base, opening year and design years
- The segments within the study limits were included by default
- Changes of  $\pm 5\%$  or more in AADT on congested highway links of level of service (LOS) D or worse
- Changes of  $\pm 10\%$  or more in AADT on uncongested highway links of LOS C or better
- Changes of  $\pm 10\%$  or more in travel time
- Changes of  $\pm 10\%$  or more in intersection delay

Any obvious "modeling artifacts" – i.e. isolated links which meet the criteria but are likely the result of the model's variability, were excluded from consideration. The extent of the affected network is shown in **Figure 3-24** and the results of the MSAT evaluation are summarized in **Table 3-6**.

Technical shortcomings of emissions and dispersion models and uncertain science with respect to health effects prevent meaningful or reliable estimates of MSAT emissions and effects of this project at this time. While it is possible that localized increases in MSAT emissions may occur as a result of this project, emissions would likely be lower than present levels in the design year of this project as a result of USEPA's national control programs that are projected to reduce annual MSAT emissions by over 80 percent between 2010 and 2050. Although local conditions may differ from these national projections in terms of fleet mix

and turnover, Vehicle Miles of Travel (VMT) growth rates, and local control measures, the magnitude of the USEPA-projected reductions is so great (even after accounting for VMT growth) that MSAT emissions in the study area are likely to be lower in the future in nearly all cases.

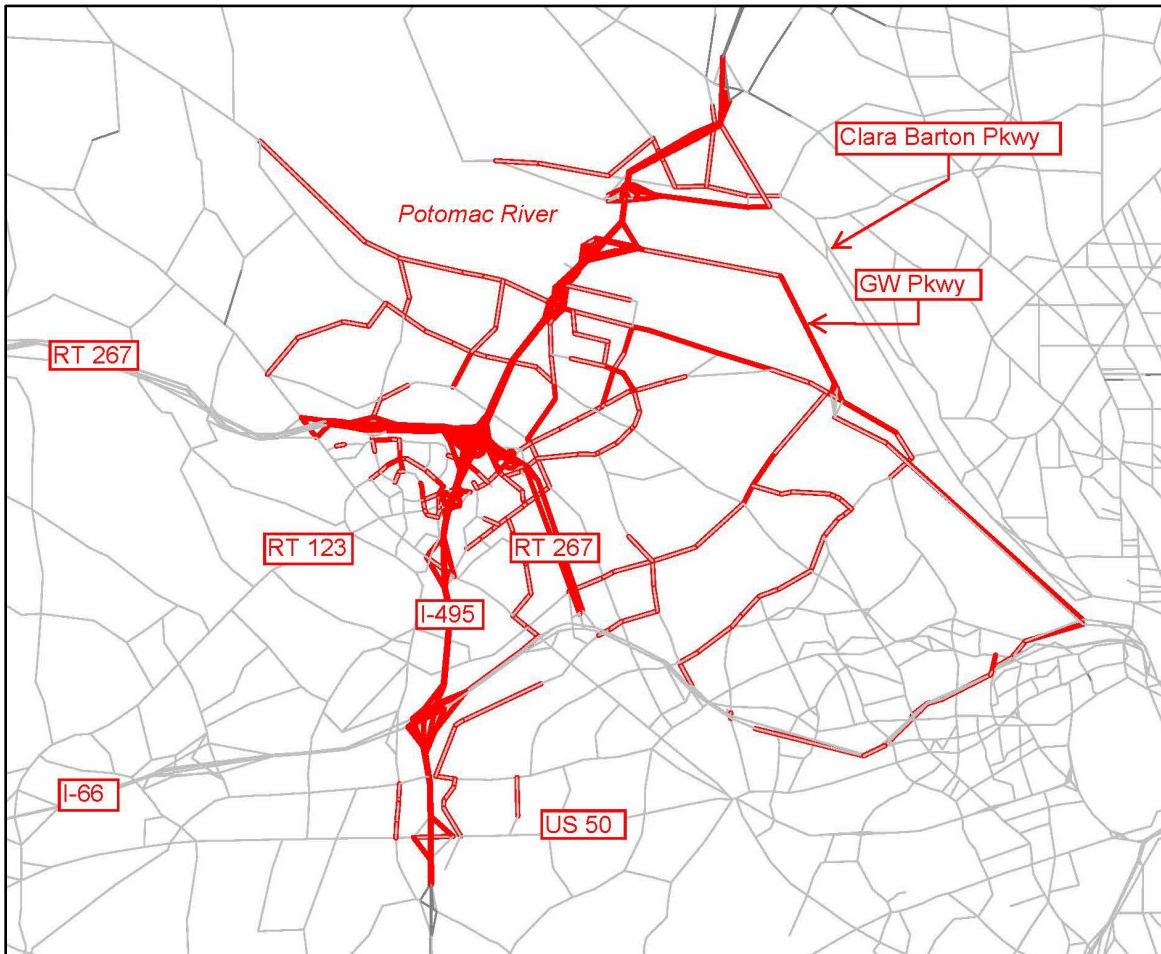


Figure 3-24. MSAT Affected Network shown on 2025 Build Network

Table 3-6. Annual MSAT Emissions by Year, Scenario and Pollutant on the Affected Network

Pollutant	2018 (tpy)	2023 (tpy)		2045 (tpy)	
	Base Year	No Build	Build	No Build	Build
Diesel PM	3.687	2.283	2.235	0.549	0.523
Benzene	0.456	0.346	0.341	0.121	0.115
1,3-Butadiene	0.046	0.026	0.025	0.001	0.001
Formaldehyde	0.729	0.575	0.531	0.279	0.265
Acrolein	0.048	0.035	0.033	0.013	0.012



Pollutant	2018 (tpy)	2023 (tpy)		2045 (tpy)	
	Base Year	No Build	Build	No Build	Build
POM	0.035	0.025	0.023	0.006	0.006
Naphthalene	0.078	0.058	0.054	0.022	0.021
Ethyl Benzene	0.263	0.205	0.207	0.109	0.103
Acetaldehyde	0.340	0.257	0.238	0.099	0.094
VMT (million VMT)	1,400.6	1,523.5	1,545.4	1,791.6	1,713.7

MSAT = Mobile Source Air Toxics; tpy = tons per year; VMT = Vehicles Miles of Travel

### Greenhouse Gases (GHG)

There are currently no explicit federal requirements pertaining to transportation project-related greenhouse gas (GHG) emissions, although a qualitative GHG assessment was completed to help support an informed decision. In the absence of federal requirements, VDOT is currently evaluating options to address GHG emissions and climate change impacts in environmental documents. Virginia's participation in the Transportation and Climate Initiative may also result in future GHG emission reductions.

GHG emissions from vehicles using roadways are a function of distance travelled (expressed as vehicle miles travelled, or VMT), vehicle speed, fuel type and road grade. GHG emissions are also generated during roadway construction and maintenance activities. Although vehicle miles traveled (VMT) is anticipated to increase between 2018 and 2045 (consistent with national and local trends over the past several decades), VMT is expected to be lower in the 2045 Build scenario compared to the 2045 No Build scenario. This is attributed to a number of factors. The Express Lanes would directly encourage carpooling and improve I-495 bus operations, both of which are anticipated to reduce VMT and GHG emissions. While the I-495 NEXT project would result in some localized re-routing of traffic due to the new Express Lanes being available (e.g., from the local arterial network back onto I-495), it is not anticipated to induce much new demand upstream or downstream of the project. The project is also anticipated to shift demand in Virginia from parallel arterial facilities to the freeway network, which would result in more direct (shorter-distance) trips being taken. The managed lane system in Maryland is assumed to be in place for the future No Build and Build scenarios, including managed lanes across the ALMB, and this represents a more substantial capacity improvement to the overall regional roadway network than Virginia's 495 NEXT project. The qualitative GHG analysis relied on the same traffic used in the quantitative MSAT analysis, which generally focuses on roadways where ADT is expected to change by +/- 5% as a result of the project, consistent with FHWA guidance.

A major factor in mitigating the increase in VMT between 2018 and 2045 is EPA's GHG emission standards, implemented in concert with national fuel economy standards. The Energy Information Administration (EIA) estimated that fuel economy will improve by 65% between 2018 and 2050 for all light-duty vehicles. This improvement in vehicle emissions rates is more than sufficient to offset the increase in VMT over this period. Thus, the project area would see a net reduction in GHG emissions under the 2045 Build Alternative compared to the 2045 No Build Alternative or the 2018 existing conditions. The recent rollback of some light-duty vehicle fuel economy standards may reduce the EIA's projections of future fuel economy benefits, but improvements in GHG emission rates are still planned for light, medium,

and heavy-duty vehicles in the coming years. Therefore, the recent rollback is not reasonably expected to change the conclusions of the qualitative GHG analysis in the *I-495 Revised Air Quality Technical Report* (VDOT, 2021a).

Construction and subsequent maintenance of the project would generate additional GHG emissions. Typically, construction emissions associated with a new roadway accounts for a relatively minor amount of the total 20-year lifetime emissions from the roadway, although this can vary widely with the extent of construction activity and the number of vehicles that use the roadway.

The addition of new roadway miles within the study area would also increase the energy and GHG emissions associated with maintaining the additional lane miles in the future. The total roadway lane miles that need to be maintained on an ongoing basis would increase by approximately 20% on I-495 relative to the No Build Alternative (based on the increase from a 10 to 12 lane cross section.) The increase in maintenance needs due to the additional lane miles would be partially offset by the reduced traffic on alternate routes that drivers would otherwise take in the No Build Alternative.

Finally, extending the I-495 Express Lanes creates new opportunities for buses, carpools, and other transit use by providing faster and more reliable travel. Increasing the use of these modes of transport is anticipated to reduce VMT and result in a decrease in GHG emissions.

### Construction Emissions

Construction activities have historically been considered temporary in nature and have not met the conformity criterion (five-years at one location) to be addressed in project-level air quality analyses. As a result, construction-related emissions are not typically addressed in project-level analyses. If and when the conformity criterion is met, construction-related emissions would be estimated following applicable regulatory requirements and as appropriate guidance.

### Air Quality Mitigation

The VDEQ provides general comments for projects by jurisdiction. Their comments in part address mitigation. For Fairfax county, VDEQ comments relating to mitigation are<sup>9</sup> “...all reasonable precautions should be taken to limit the emissions of VOC and Nox. In addition, the following VDEQ air pollution regulations must be adhered to during the construction of this project: 9 VAC 5-130, Open Burning restrictions<sup>10</sup>; 9 VAC 5-45, Article 7, Cutback Asphalt restrictions<sup>11</sup>; and 9 VAC 5-50, Article 1, Fugitive Dust precautions<sup>12</sup>.”

The I-495 NEXT project would follow all state and federal regulations, including on-site regulations for workers related to fugitive dust. With these measures in place, it is not expected that fugitive dust would migrate to areas where the public frequents, including adjacent residential areas. All construction activities

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<sup>9</sup> Spreadsheet entitled: “DEQ SERP Comments rev8b”, March 2017, downloaded from the online data repository for the VDOT Resource Document. [http://www.virginia.gov/projects/environmental\\_air\\_section.asp](http://www.virginia.gov/projects/environmental_air_section.asp)

<sup>10</sup> See: <https://law.lis.virginia.gov/admincode/title9/agency5/chapter130/section100/>

<sup>11</sup> See: <http://leg1.state.va.us/cgi-bin/legp504.exe?000+reg+9VAC5-45-760>

<sup>12</sup> See: <http://leg1.state.va.us/cgi-bin/legp504.exe?000+reg+9VAC5-50-60>

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will be required to adhere to VDEQ’s fugitive dust regulation (9 VAC 5-50, Article 1, et seq.), which would have the effect of minimizing all fugitive construction dust. Mitigation measures to be used during construction could include:

- Use water trucks to minimize dust
- Cover trucks when hauling soil, stone, and debris
- Minimize land disturbance
- Use dust suppressants if environmentally acceptable
- Stabilize or cover stockpiles
- Construct stabilized construction entrances per construction standard specifications
- Regularly sweep all paved areas including public roads
- Stabilize onsite haul roads using stone
- Temporarily stabilize disturbed areas per VDOT erosion and sediment standards

Silica dust is a type of fugitive dust. The Occupational Safety and Health Administration (OSHA) has published a silica fact sheet<sup>13</sup> consistent with standard 29 Code of Federal Regulations (CFR) 1926.1153<sup>14</sup>. Table 1 in 29 CFR 1926.1153 provides effective dust control methods for a list of 18 common construction tasks. The OSHA fact sheet lists alternative exposure control methods for employers who do not fully implement the control methods on Table 1 of 29 CFR 1926.1153.

### Air Quality Conclusions

The proposed improvements were assessed for potential air quality impacts and compliance with applicable air quality regulations and guidance. All models, methods/protocols and assumptions applied in modeling and analyses were made consistent with those provided or specified in the VDOT Resource Document. The assessment indicates that the project would meet all applicable NEPA air quality requirements and federal and state transportation conformity regulations. As such, the project would not cause or contribute to a new violation, increase the frequency or severity of any violation, or delay timely attainment of the NAAQS established by the USEPA.

### 3.11 NOISE

Existing and predicted future noise levels within the limits of the noise study under the Build Alternatives were evaluated in accordance with FHWA’s Procedures for Abatement of Highway Traffic Noise and Construction Noise (23 C.F.R. §772) and VDOT’s *Highway Traffic Noise Impact Analysis Guidance Manual* (updated February 2018). All traffic noise modeling for this study was conducted using the latest federally required version of the FHWA Traffic Noise Model (TNM). For additional information, refer to the *I-495 Noise Technical Report* (VDOT, 2020c).

To determine the degree of impact noise will have on human activity, the FHWA established Noise Abatement Criteria (NAC) for different categories of land use. If noise levels are predicted to approach or exceed the absolute FHWA/VDOT NAC for the design year build scenario at any receptor, then an impact is said to occur, and a noise abatement evaluation is warranted. VDOT defines the word “approach” in

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<sup>13</sup> See <https://www.osha.gov/Publications/OSHA3681.pdf>

<sup>14</sup> See: <https://www.osha.gov/silica/SilicaConstructionRegText.pdf>



“approach or exceed” as within 1 decibel. The NAC are measured in decibels and denoted as dB(A). The following NAC categories were identified within the limits of the noise study:

- *Category B* – exterior residential. For uses included within Category B, noise impact would occur wherever project noise levels are expected to approach within one decibel or exceed 67 dB(A);
- *Category C* – exterior recreational or institutional, including areas such as campgrounds, libraries, parks, active sport areas, places of worship, and medical facilities. For uses included within Category C, noise impact would occur wherever project noise levels are expected to approach within one decibel or exceed 67 dB(A);
- *Category D* – interior institutional uses which may be noise sensitive, such as auditoriums, day care centers, institutional structures, and public meeting rooms. For Category D uses, noise impact would occur where predicted project-related interior noise levels approach or exceed 52 dB(A); and
- *Category E* – exterior commercial areas, including hotels, restaurants and bars, offices, and similar developed lands, properties, or activities. For Category E (commercial) land use, noise impact is assumed to occur where predicted exterior noise levels approach or exceed 72 dB(A).

Consistent with FHWA/VDOT noise policy and guidance, the noise study limits defined in the *I-495 Noise Technical Report* (VDOT, 2020c) (i.e., noise study area) is limited to 500 feet from the proposed edge of pavement. The noise study area is shown on **Figure 3-25** along with the locations of potential noise barriers that were determined to be feasible and reasonable. Predicted noise levels for the Existing Conditions and the future design year Build Alternative (2045) were only evaluated at noise sensitive receptors within the limits of the noise study area.

For purposes of the noise study, the Build Alternative is defined as the future design year Build Alternative (2045), which was used to identify noise impacts, including the evaluation and design of potential noise barriers, where warranted. As a result, the Build Alternative (as defined in the *I-495 Noise Technical Report* [VDOT, 2020c]) includes all of the proposed roadway improvements associated with the I-495 NEXT project, and the following No-Build Projects (i.e., Projects Constructed by Others):

- I-495/I-270 Managed Lanes Study – SHA;
- I-495 Interchange Ramp Phase II, Ramp 3 Dulles Airport Access Road (DAAR);
- I-495 Capital Beltway Auxiliary Lanes; and
- DAAR/I-495 Capital Beltway Interchange Flyover Ramp Relocation (Phase IV DAAR).

FHWA and VDOT require that noise barriers be both “feasible” and “reasonable” to be recommended for construction. To be feasible, a barrier must reduce noise levels at noise sensitive locations by at least five dB(A), thereby “benefiting” the property. VDOT requires that at least 50 percent of the impacted receptors receive five dB(A) or more of noise reduction from the proposed barrier. Additionally, constructability issues such as safety, barrier height, topography, drainage, utilities, maintenance of the barrier, and access to adjacent properties must be assessed. In addition to any potential engineering conflicts that are evaluated, VDOT’s noise policy states that noise barrier panels cannot exceed the maximum allowable panel height of 30 feet.

Barrier reasonableness is based on three factors: cost-effectiveness, ability to achieve VDOT’s noise reduction design goal, and voting results of the benefited receptors. To be “cost-effective,” a barrier’s

surface area cannot exceed 1,600 square feet per benefited receptor. The second reasonableness criterion is the ability to achieve VDOT's noise reduction design goal of seven dB(A) for at least one of the impacted receptors. The third reasonableness criterion requires that 50 percent or more of the benefited receptors (owners and residents of the potentially benefited properties) vote in favor of the barrier for it to be considered reasonable to construct. In order to assess community views, a survey of benefited receptors would be conducted during the final design phase.

Note, this preliminary analysis was performed with conceptual engineering data; a more detailed review will be completed during detailed design. As such, noise barriers that were found to be feasible and reasonable during the preliminary design phase (Preliminary Noise Analysis) may be found to be not feasible and/or not reasonable during the Final Design Noise Analysis (FDNA) to be documented in the Noise Abatement Design Report (NADR). Conversely, noise barriers that were not considered feasible and reasonable during preliminary design may meet the established criteria during detailed design and be recommended for construction. Thus, any conclusions derived in the *I-495 Noise Technical Report* (VDOT, 2020c) should be considered preliminary in nature and subject to change.

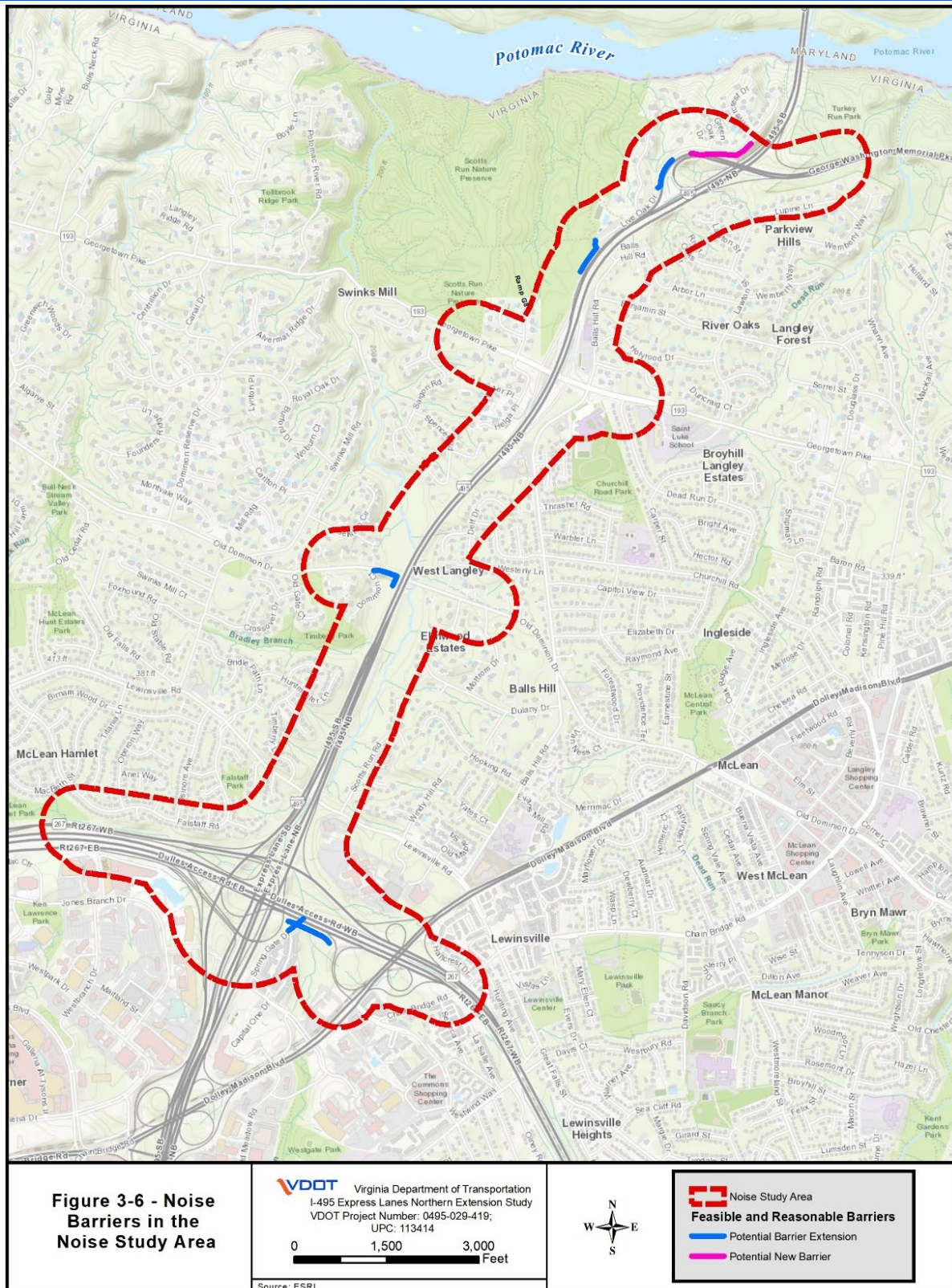


Figure 3-25. Noise Receivers in the Study Area



### 3.11.1 Existing Conditions

To assess existing noise conditions within the noise study area, short-term and long-term noise monitoring was conducted to assess the existing noise environment and validate the TNM. Short-term noise monitoring was performed at 28 locations; these sites were used solely for noise model validation. The monitored noise levels in the noise study area ranged from 54.6 dB(A) to 74.5 dB(A). Traffic noise from I-495, GW Parkway, Dulles Toll Road (DTR), and Route 123 were identified as the dominant sources of noise within the noise study area. Long-term (24-hour) noise monitoring was conducted at five sites to assist with the selection of the loudest hour and evaluate the rail noise contribution associated with the Washington Metropolitan Area Transit Authority's (WMATA) Silver Line.

Within the noise study area, a total of 1,115 noise receivers were modeled to represent 1,441 noise receptors to predict how the proposed improvements would affect the noise levels throughout the noise study area. The 1,441 receptors included 1,263 residential receptors (NAC B), 131 recreational receptors (NAC C), seven interior receptors (NAC D), and 40 commercial receptors (NAC E). Specific receptor placement was generally based on exterior areas where there is frequent human use. The noise study area also includes 13 existing noise barriers and WMATA's Silver Line, which were included in the noise evaluation.

For all modeled receptors, the Existing Conditions noise levels are predicted to range from 42 to 72 dB(A), with impacts predicted at 115 receptors including 92 residential receptors, 20 recreational receptors, and three commercial receptors.

### 3.11.2 Environmental Consequences

#### *No Build Alternative*

Under NEPA requirements, the No Build Alternative analysis assists with making informed decisions on whether future increases in noise levels would be considered significant. However, noise level increases within interstate corridors are generally less than 3 dB(A) due to the nature of the facility and can be mitigated through noise abatement measures such as noise barriers. In addition, future design year noise level increases of 3 dB(A) or more over the Existing Conditions are not common along existing and heavily traveled Interstate corridors. Therefore, it was not anticipated that a 3 dB(A) increase over the Existing Conditions would occur. The FHWA considers changes in noise levels of 3 dB(A) or less to be barely perceptible to the human ear, under normal conditions. As a result, No Build Alternative noise levels were not predicted for receptors within the noise study area.

#### *Build Alternative*

The loudest-hour of the day for the Build Alternative was determined to be 12:00 p.m. to 1:00 p.m. Noise levels are predicted to range from 43 to 74 dB(A), with a total of 148 noise sensitive receptors including 123 residences and 25 recreational sites were predicted to be impacted under the Build Alternative. On average for all receptors, sound levels are predicted to increase from the Existing Conditions by approximately one dB(A). This increase is due primarily to the roadway improvements allowing slightly higher traffic volumes in the loudest-hour periods. Noise barriers were evaluated for all areas where noise impacts were predicted.

Five (5) new noise barriers were evaluated for areas predicted to be impacted by traffic noise under the Build Alternative. Only one of the evaluated noise barriers (Barrier C) met the feasible and reasonable criteria. While Barrier System U met the acoustical feasible criterion, the barrier system was determined to

be not feasible, due to engineering constraints. **Table 3-7** summarizes the total length, estimated cost and benefits that would be provided by the barriers evaluated, with a feasible and reasonable determination.

**Table 3-7. Summary of Proposed Noise Barrier Details**

Barrier Name	Barrier Length (ft.)	Barrier Height Range (ft.)	Barrier Surface Area (SF)	Surface Area per Benefited Receptor (MaxSF/BR)	Barrier Cost (\$42/sq.ft.)	Feasible and Reasonable <sup>1</sup>
C	1036	10-22	18,793	1,566	\$789,306	F&R
G	1,303	6-22	16,623	5,541	\$698,166	F&NR
O	1,713	10-30	35,302	2,522	\$1,482,684	F&NR
S	343	30	10,322	N/A	N/A	NF
U	784	20-30	22,612	N/A	N/A	NF

<sup>1</sup> Barriers are shown as Feasible and Not Reasonable (F&NR), Feasible and Reasonable (F&R), or Not Feasible (NF)

Of the 13 existing noise barriers identified within the noise study area, nine would be physically impacted and would be required to be replaced in-kind. As such, in-kind barrier replacement analyses will be evaluated during final design for each individual project and/or phase for all affected existing noise barriers and the in-kind barrier analysis will be consistent with *Sections 6.3.5* and *6.3.6* of the *Highway Traffic Noise Impact Analysis Guidance Manual* (VDOT, 2018) and modified as appropriate. Noise barrier extensions were determined to be feasible and reasonable for three of the four of the in-kind replacement barriers. **Table 3-8** summarizes the existing and total barrier heights and lengths of barriers that were evaluated for in-kind extensions, with a feasible and reasonable determination.

**Table 3-8. Summary of In-Kind Noise Barrier Extension Details**

Barrier Name	Existing Barrier Surface Area (SF)	Existing Barrier Length (ft.)	Total Barrier Surface Area (SF) – with In-Kind Extension	Total Barrier Length (ft.) – with In-Kind Extension	Surface Area per Benefited Receptor (MaxSF/BR)	Feasible and Reasonable <sup>1</sup>
Barrier 9 (EXT)	51,568	2,629	73,365	3,648	1,747	F&NR
Barrier 10(EXT)	17,391	1,355	39,458	2,446	669	F&R
Barrier 13B (EXT)	87,624	3,665	99,706	4,177	1,342	F&R
Barrier 12A2 (EXT)	32,505	1,583	61,211	2,636	373	F&R

<sup>1</sup> Barriers are shown as Feasible and Not Reasonable (F&NR), Feasible and Reasonable (F&R), or Not Feasible (NF)

Lastly, construction activity may cause intermittent fluctuations in noise levels. During the construction phase of the project, reasonable measures would be taken to minimize noise impact from these activities.

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### 3.12 WATERS OF THE U.S.

Water resources are federally regulated by the U.S. Environmental Protection Agency (USEPA) and the U.S. Army Corps of Engineers (USACE) under the Clean Water Act (CWA). Section 404 of the CWA specifically regulates dredge and fill activities affecting Waters of the United States (WOUS), which can be defined as all navigable waters and waters that have been used for interstate or foreign commerce, their tributaries and associated wetlands, and any other waters, including lakes, rivers, streams, ponds, impoundments, territorial seas, etc., that, if impacted, could affect the former (USEPA, 2019a). Water resources within the study area are summarized below; more detail is in the *I-495 Revised Natural Resources Technical Report* (VDOT, 2021c).

#### 3.12.1 Existing Conditions

The study area lies within the Middle Potomac-Catoctin watershed (Hydrologic Unit Code [HUC] 02070008) (VDCR, 2019a). The study area is also within the following subwatersheds:

- Potomac River-Difficult Run (HUC 0207000810)
- Potomac River-Nichols Run-Scott Run (HUC 020700081005)

An investigation to identify the boundaries of WOUS within the study area was performed in August 2018, May 2019, and September 2019 and was confirmed by USACE in December 2019.

A total of 49 streams and 42.4 acres of wetlands were identified in the study area (shown on **Figure 3-26** and **Figure 3-27**). These features are throughout the study area but are most notably between Route 267 and Old Dominion Drive, and around the I-495/GW Parkway interchange. Most streams and wetlands within VDOT right-of-way are fragmented in nature and show signs of historic alteration. This alteration is primarily caused by the routing of streams through culverts and underground pipes, and under bridges which weave throughout the road network. More detailed information regarding streams and wetlands in the study area is in the *I-495 Revised Natural Resources Technical Report* (VDOT, 2021c).



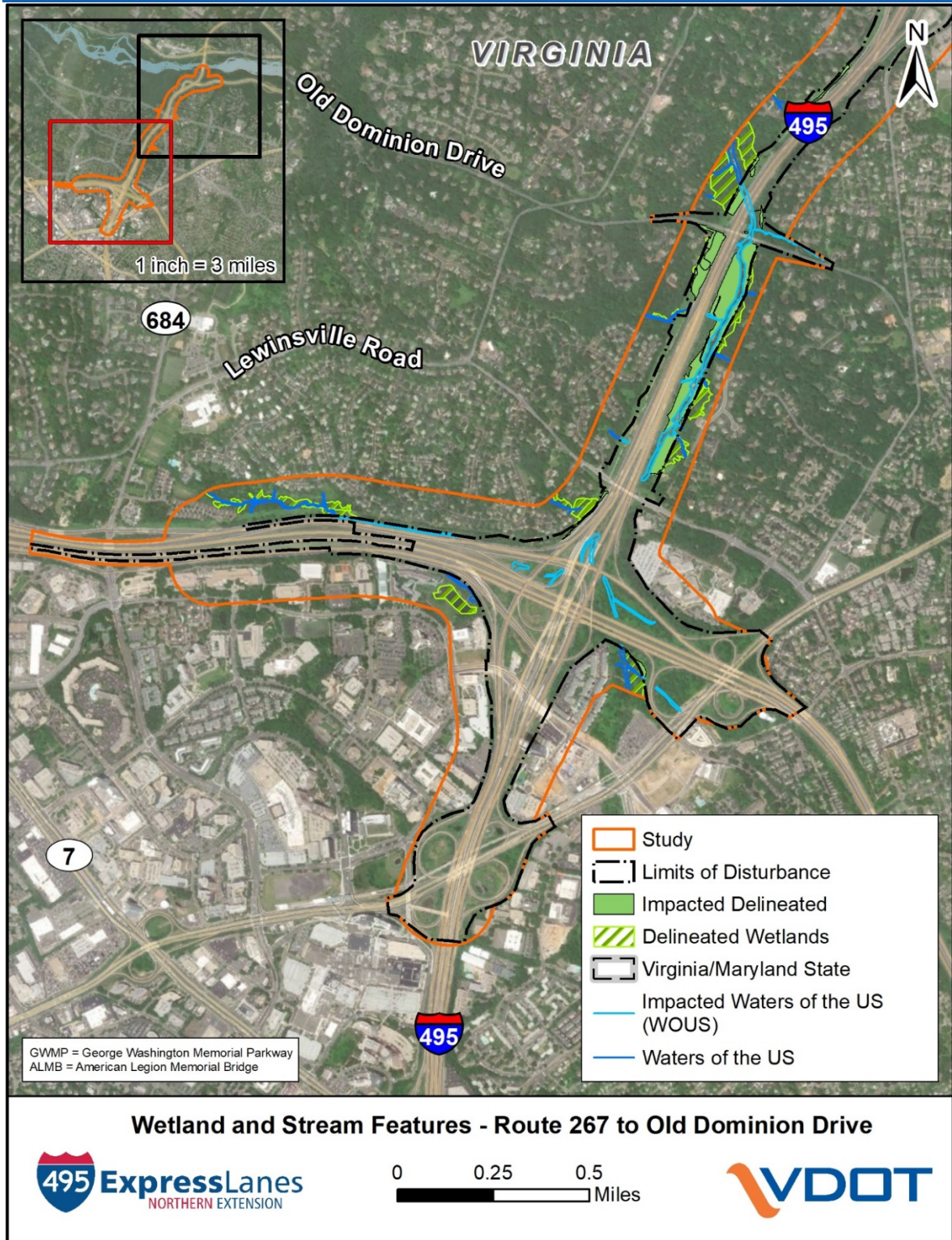


Figure 3-26. Streams and Wetland Features – Route 267 to Old Dominion Drive



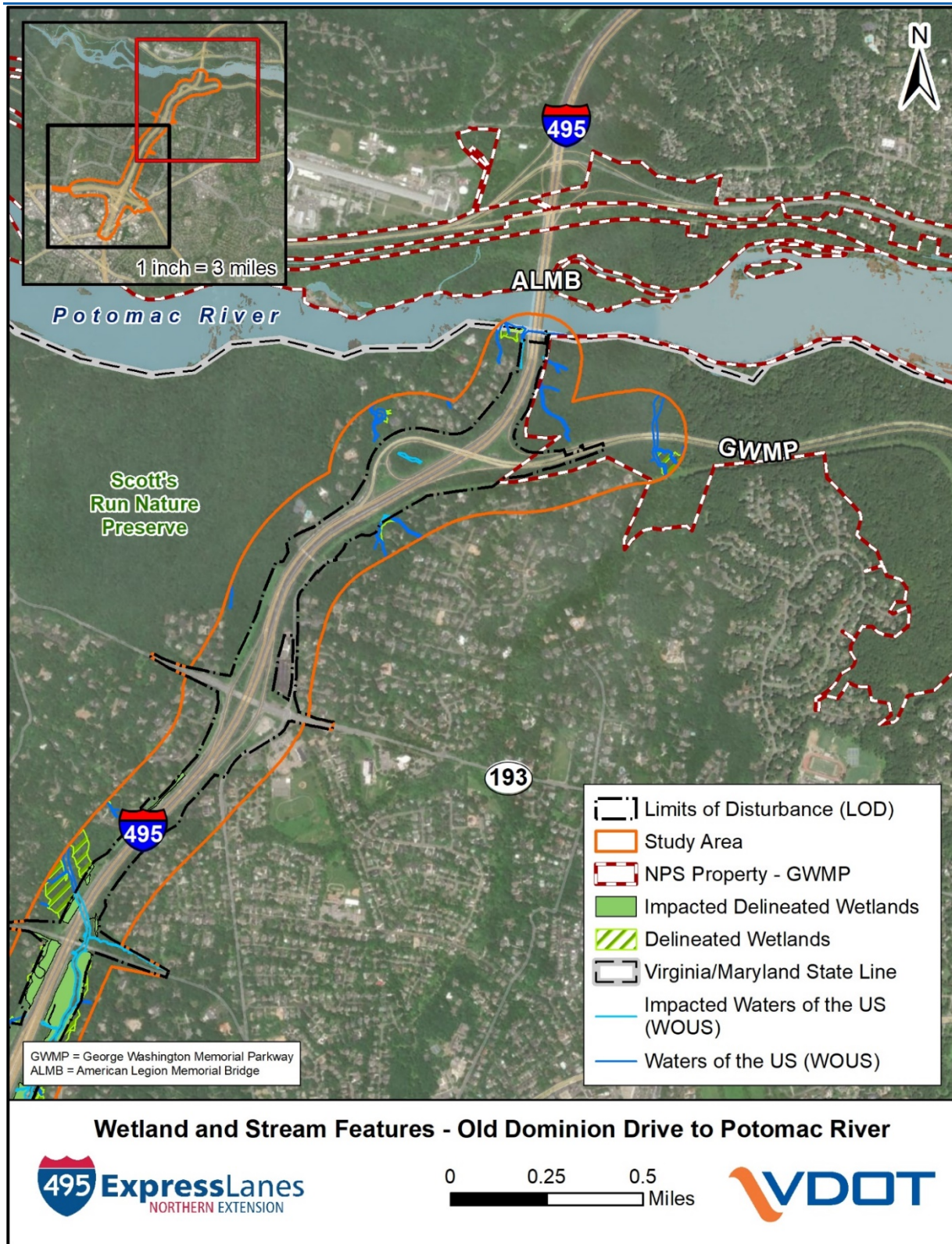


Figure 3-27. Streams and Wetland Features – Old Dominion Drive to Potomac River

### 3.12.2 Environmental Consequences

#### **No Build Alternative**

Under the No Build Alternative, no project-related construction would occur, and therefore no changes to streams or wetlands would result.

#### **Build Alternative**

Under the LOD, a total of 26 streams totaling 12,821 linear feet and 19.8 acres of wetlands would be directly impacted by the proposed improvements. This total includes permanent impacts and temporary impacts, which takes into consideration impacts from potential stream relocations, though decisions regarding relocations of streams would not be considered until more detailed design and permitting. A worst-case scenario was assumed for the purpose of these calculations by the assumption of no bridging or minimization of impacts. During final design and permitting, the impacts to these streams and wetlands would be avoided and minimized to the greatest extent practicable through bridging and other avoidance and minimization efforts. **Table 3-9** summarizes the total streams and wetlands in the study area, the anticipated impacts within the LOD, and the potential compensatory mitigation credits required. These would continue to be refined through final design and coordination with permitting agencies.

**Table 3-9. Streams and Wetlands in Study Area and Estimated Impacts of the Build Alternative**

	Wetlands (acres)	Streams (Linear Feet)
<b>Total in the Study Area</b>	42.4	28,959
<b>Total Impacted within the LOD</b>	19.8	12,821
<b>Total Potential Compensatory Mitigation Credits Required</b>	33.3	15,439

Source: I-495 Revised Natural Resources Technical Report (VDOT, 2021c)

LOD = Limits of Disturbance

The potential impacts to wetlands within the LOD due to roadway construction would likely include discharges of fill material for culverted stream crossings, bridge approaches and abutments, and roadway cut and fill slopes. The portions of these wetlands within the LOD would either lose all wetland functions or have reduced functions due to a conversion in wetland type or hydraulic alteration or isolation. Potential impacts to streams and wetlands are unavoidable due to the necessity of the improvements to be adjacent and parallel to the existing I-495 roadway. Impacts would occur primarily due to fill resulting from roadway widening and appurtenant features, interchange reconfiguration, culvert extensions, drainage improvements, bridge and roadway expansions, stormwater management facilities, noise barriers, and construction access. The majority of potential impacts are associated with mainline improvements.

Avoidance and minimization would be considered during the permitting and design process, via adjustments in construction means and methods to reduce the length of permanent and temporary stream impacts. Minor alignment shifts in localized areas could be employed to avoid lateral encroachments on particular streams or wetlands; however, because the Build Alternative primarily involves expanding an existing roadway, opportunities are dependent upon the current positioning of the WOUS relative to the roadway crossing.



Unavoidable impacts to WOUS would require submittal of a Joint Permit Application to request permits from USACE, VDEQ, Virginia Marine Resources Commission (VMRC), and Local Wetlands Board as applicable. Based on the conceptual LOD, it is anticipated that Individual Permits would be required from the USACE, VDEQ, and VMRC for the Build Alternative.

In accordance with federal and state permitting requirements, compensatory mitigation is required for all unavoidable permanent impacts to WOUS. A total of up to 15,439 compensation credits for stream impacts and 33.3 compensation credits for wetland impacts may be required for the Build Alternative as currently proposed. For the purposes of this Revised EA, the compensation calculations assume that all WOUS within the LOD would be permanently impacted. However, impacts to streams and wetlands would be further avoided and minimized during final design, so the required compensation is likely to decrease. More information regarding access to and obtaining compensation credits is included in the *I-495 Revised Natural Resources Technical Report* (VDOT, 2021c).

On January 9, 2020, USACE's Regulatory In Lieu Fee and Bank Information Tracking System (RIBITS) was queried to identify mitigation bank credits available for purchase within the same or adjacent HUC, watershed, and service area as the project. Approximately 2,245 stream credits and 3.98 wetland credits are available from approved private mitigation banks in the primary service area of the study area (USACE, 2019). Avoidance and minimization would be considered throughout the permitting and design process. If, at the time of project permitting and construction, there are not enough compensatory mitigation credits available, the remaining credits would be purchased from an approved in-lieu fee fund. Further consideration of how many credits would be required would come during more detailed design and permitting when considerations can be made of temporary impacts and stream relocations.

### 3.13 WATER QUALITY

In compliance with Sections 303(d), 305(b), and 314 of the Federal Water Pollution Control Act (i.e., 1972 Clean Water Act amended in 1977, or CWA) and the Safe Drinking Water Act, VDEQ has developed a prioritized list of water bodies that currently do not meet state water quality standards (VDEQ, 2019b). Water quality standards are set based on the designated use for a given waterbody. All Virginia waters are designated for one of the following primary uses:

- Recreational uses, such as swimming and boating
- The propagation and growth of a balanced, indigenous population of aquatic life, including game fish, which might reasonably be expected to inhabit them
- Wildlife
- The production of edible and marketable natural resources, such as fish and shellfish (VDEQ, 2019i)

Virginia's water quality standards (9 VAC 25-260) define the water quality needed to support each of these primary uses by establishing numeric physical and chemical criteria. If a water body fails to meet the water quality standards for its designated use, it is considered to be impaired and placed on the 303(d) list, as required by Section 303(d) of the CWA (VDEQ, 2019a). The 303(d) list is updated on a biennial basis. State waters can be added to or removed from the 303(d) list with each new list publication.

The Chesapeake Bay Preservation Act (CBPA) was enacted by the Virginia General Assembly in 1988 to protect and manage Virginia's coastal zone. The CBPA is designed to improve water quality in the portion

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of the Chesapeake Bay watershed that falls within the state of Virginia through effective land management and land use planning. According to the Fairfax County Chesapeake Bay Preservation Ordinance (CBPO), Resource Protection Areas (RPA) include tidal wetlands, tidal shores, water bodies with perennial flow, and non-tidal wetlands connected by surface flow and contiguous to tidal wetlands or perennial water bodies, as well as a 100-foot vegetated buffer area located adjacent to and landward of these features and any land within major floodplains associated with these features (VDEQ, 2019c). The following section summarizes water quality and RPAs within the study area; more detail is in the *I-495 Revised Natural Resources Technical Report* (VDOT, 2021c).

### 3.13.1 Existing Conditions

Of the 49 streams that were identified in the study area, Dead Run and the Potomac River are the only designated impaired waters under Section 303(d) of the CWA (see **Figure 3-28**). Dead Run is listed as “impaired” due to an impaired macroinvertebrate community (VDEQ, 2018). Although the Potomac River is technically in Maryland, it is addressed in this report because a small portion falls within the study area, and the LOD extends to the edge of the river to accommodate the outfall transporting clean, treated water to the river. The Potomac River is on Maryland’s impaired waters list due to excess nutrient and sediment inputs (MDE, 2019).

Pursuant to the federal Coastal Zone Management Act (CZMA) of 1972, as amended, and its implementing regulations in Title 15, Code of Federal Regulations, Part 930, federal activities, including permits, licenses, and federally funded projects, located in Virginia’s Coastal Management Area or those that can have reasonably foreseeable effects on Virginia’s coastal uses or coastal resources must be conducted in a manner which is consistent, to the maximum extent practicable, with the enforceable policies of the Virginia Coastal Zone Management Program. The VDEQ Office of Environmental Impact Review coordinates the review of federal consistency determinations among these agencies. Federal consistency review would be conducted concurrently with the permitting process during final design.

According to available data, there are approximately 152.6 acres of RPA lands within the study area. Waterways subject to RPAs include the Potomac River, Scott Run, Dead Run, Bradley Branch, and their respective tributaries. More information regarding the location of waterways subject to RPAs and the acreage of RPA lands per waterway within the study area can be seen in the *I-495 Revised Natural Resources Technical Report* (VDOT, 2021c).

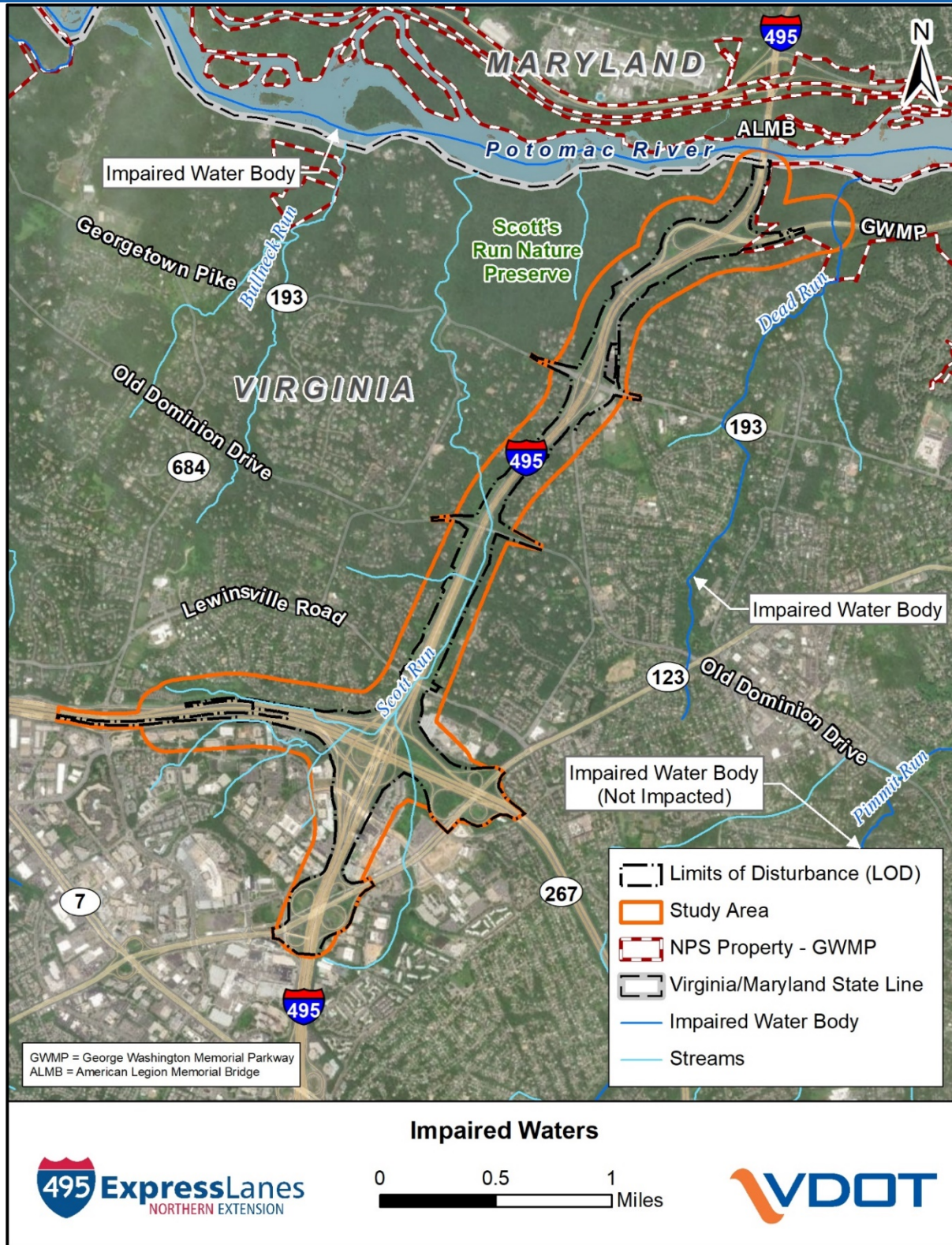


Figure 3-28. Impaired Waters



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### 3.13.2 Environmental Consequences

#### ***No Build Alternative***

Under the No Build Alternative, no project-related construction would occur, and therefore no changes in water quality would result. Areas along the I-495 corridor where stormwater management features are absent or outdated would not be improved under the No Build Alternative. No changes to RPAs or any associated resources would result.

#### ***Build Alternative***

No direct project impacts would be within the physical footprint of Dead Run, as it is not within the LOD. Although the mainstem Potomac River is on the 303(d) list for the state of Maryland, it is not within the LOD and is not expected to be impacted. There are several tributaries of the Potomac River that are within the study area, but besides Dead Run, none of these are on the 303(d) list.

The I-495 NEXT project is required to comply with the administration, implementation, and enforcement of the Virginia Stormwater Management Act. In accordance with the Virginia Administrative Code (9VAC25-870), stormwater management infrastructure would be provided to address runoff from new impervious surfaces. Water quality best management practices (BMP) would mitigate the nutrient impact from the new impervious surfaces. Water quantity would be addressed through the implementation of stormwater management facilities, adequate outfall, and channel and flood protection requirements.

Although RPAs are protected resources, public roads are conditionally exempt from regulation under Virginia Administrative Code (9 VAC 25-830-150). More information about this exemption and potential impacts to RPAs is described in the *I-495 Revised Natural Resources Technical Report* (VDOT, 2021c).

### 3.14 FLOODPLAINS

Several federal directives regulate construction in floodplains to ensure that consideration is given to avoidance and mitigation actions that can be taken to preserve natural floodplain services. These federal directives include the National Flood Insurance Act of 1968, Executive Order 11988, and U.S. Department of Transportation (USDOT) Order 5650.2, entitled “Floodplain Management and Protection.” Floodplains within the study area are summarized below; more detail is in the *I-495 Revised Natural Resources Technical Report* (VDOT, 2021c).

The 100-year flood, or base flood, is the area covered by a flood that has a one percent chance of occurring in any given year; this is commonly referred to as the 100-year floodplain. The 100-year floodplain includes the floodway, which is the area that experiences the deepest water and highest velocities.

#### **3.14.1 Existing Conditions**

Approximately 94.1 acres of 100-year floodplains are located within the study area. **Table 3-10** details the number of acres of floodplains associated with each waterway in the study area. Floodplains associated with three waterways are currently crossed by the existing I-495 facilities. The approximate locations of the floodplain limits are provided in **Figure 3-29**. No designated floodways were identified within the study area.

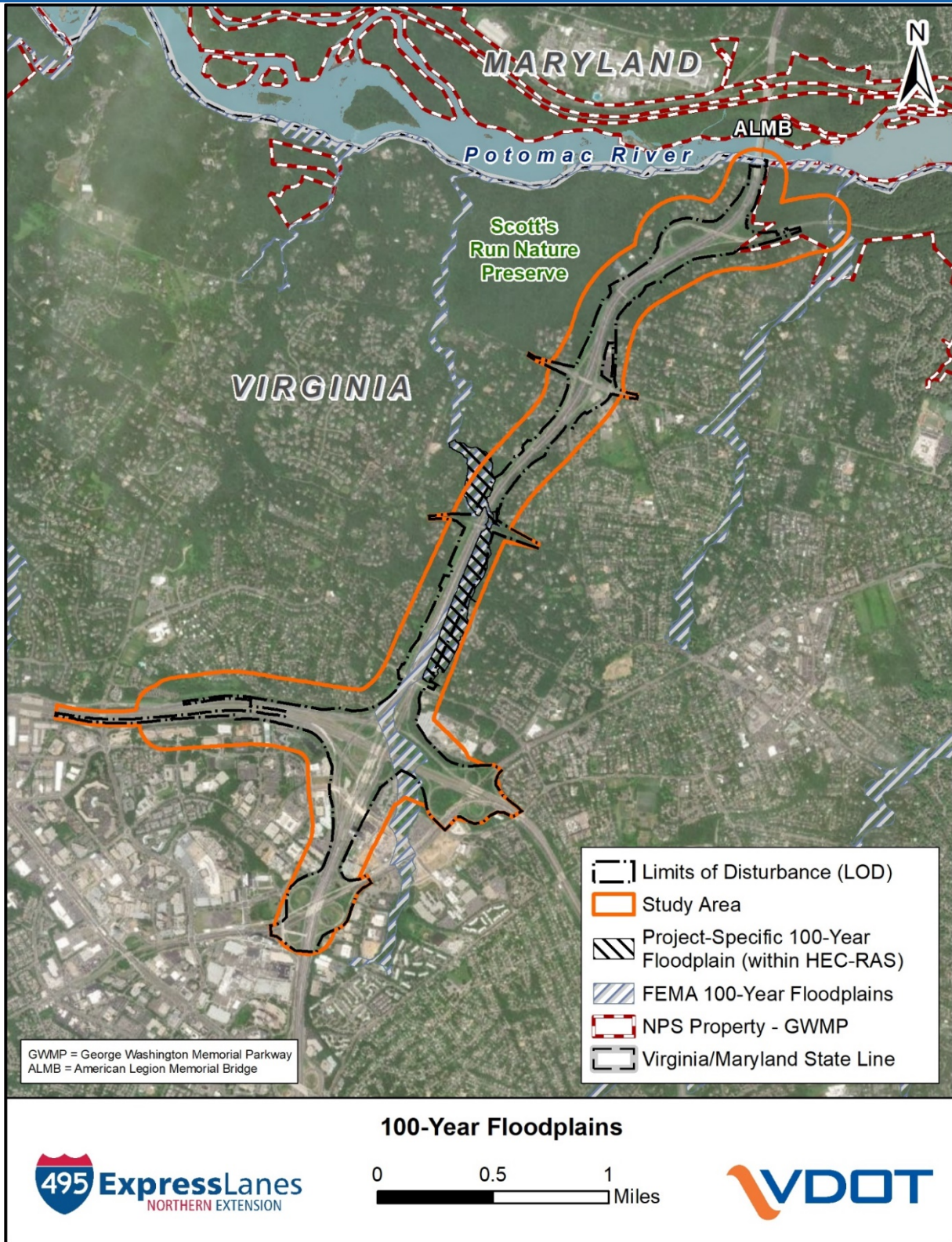


Figure 3-29. 100-Year Floodplains

Floodplain data reflected in the figure includes a combination of project-specific floodplain analysis results along the primary I-495 corridor and Federal Emergency Management Agency floodplain data within the remainder of the LOD. The floodplain modeling would be updated during the final design process.

### 3.14.2 Environmental Consequences

#### *No Build Alternative*

Under the No Build Alternative, no project-related construction would occur, and therefore no changes to floodplains would result.

#### *Build Alternative*

Approximately 60 acres of floodplains that are located within the LOD (see **Table 3-10**). A worst-case scenario was assumed by running calculations assuming no bridging or minimization of impacts and including impacts due to stream relocations. During final design and permitting the impacts within these floodplains would be reduced to the greatest extent practicable through bridging and other avoidance and minimization efforts. Once stream relocations are designed, impacts within the floodplains would be further evaluated. All floodplains within the LOD are associated with Scott Run which runs through the center of the study area between Old Dominion Drive and through the Route 267 interchange, and Dead Run which is located within NPS land in the northeast corner of the study area.

**Table 3-10. 100-Year Floodplains in Study Area and Estimated Impacts of the Build Alternative**

Waterway	100-Year Floodplains Present in Study Area (Acres)	Estimated LOD Within 100-Year Floodplain (Acres)
Potomac River	3.6	0.0
Dead Run	4.3	0.0
Scott Run*	86.2	60.0
<b>Total</b>	<b>94.1</b>	<b>60.0</b>

\*These values are expected to decrease after additional project-specific floodplain analysis is completed during final design.  
LOD = Limits of Disturbance

Filling in floodplains can result in loss of floodplain functions. Floodplain encroachment can potentially alter the hydrology of the floodplain, which can indirectly result in more severe flooding in terms of flood height, duration, and erosion. However, the Build Alternative would not increase flood levels and would not increase the probability of flooding or the potential for property loss and hazard to life. Further, the Build Alternative would not be expected to have substantial effects on natural and beneficial floodplain values. The Build Alternative would be designed so as not to encourage, induce, allow, serve, support, or otherwise facilitate incompatible base floodplain development. It is anticipated that the potential encroachment into the floodplain would not be a “significant encroachment” (as defined in 23 CFR 650.105(q)) because:

- It would pose no significant potential for interruption or termination of a transportation facility that is needed for emergency vehicles or that provides a community’s only evacuation route;
- It would not pose significant flooding risks; and
- It would not have significant adverse impacts on natural and beneficial floodplain values.



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Efforts to minimize floodplain encroachment would be considered during final design to avoid or minimize impacts on natural and beneficial floodplain values.

### 3.15 WILDLIFE AND HABITAT

Habitat is defined as the essential elements that a given wildlife species needs to survive, including food, water, and shelter (VDWR, 2019a). Development projects can lead to habitat fragmentation and loss of critical habitat for both terrestrial and aquatic species. Habitat loss can have serious consequences for the survivability of wildlife populations.

The U.S. Fish and Wildlife Service (USFWS) and Virginia Department of Wildlife Resources (VDWR, formerly Virginia Department of Game and Inland Fisheries [VDGIF]) act as consulting agencies under the United States Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.), and provide environmental analysis of projects or permit applications coordinated through the Federal Energy Regulatory Commission, USACE, and other state or federal agencies (VDWR, 2020). Their role in these procedures is to determine likely impacts on fish and wildlife resources and their habitats, and to recommend appropriate measures to avoid, reduce, or compensate for those impacts.

Wildlife and available wildlife habitat within the study area are summarized below; more detail is in the *I-495 Revised Natural Resources Technical Report* (VDOT, 2021c).

#### 3.15.1 Existing Conditions

Several types of available wildlife habitat are located within the study area and are classified by the Virginia Geographic Information Network (VGIN) as: forest, tree, hydro, turfgrass, pasture, scrub/shrub, and NWI/Other (VGIN, 2016). Similar types were combined in **Figure 3-30** to indicate similar habitat types. Available wildlife habitat accounts for approximately 641 acres of the study area, and approximately 35% of this habitat is within existing VDOT right-of-way and is therefore reserved for transportation purposes. The available wildlife habitat in the right-of-way is within or immediately adjacent to the active I-495 corridor; therefore, the quality of the habitat has been impacted by this use.

Scotts Run Stream Valley Park, Westgate Park, Ken Lawrence Park, McLean Hamlet Park, Falstaff Park, McLean Knolls Park, Timberly Park, Churchill Road Park, Cooper Intermediate School Site, Langley Oaks Park, and Scott's Run Nature Preserve are natural areas occurring within or in close proximity to the study area which feature a mix of natural lands and recreational facilities (Fairfax County, 2019). Parks owned by the FCPA or the United States and administered by NPS can be seen in **Figure 3-30**.

The forestlands remaining in the study area are typical of oak-hickory forest and provide habitat for many of the typical terrestrial urban wildlife species inhabiting this region. However, extensive portions of the study area adjacent to the existing roadway have been developed for residential, commercial, or industrial purposes which has led to less natural forest cover and an increase in impervious surfaces and turfgrass. The existing roadway forms major habitat fragmentation of forested areas posing a virtually impenetrable barrier to crossings by terrestrial species due to vehicle strikes and the presence of fence lines that bound the highway.

The VDCR Natural Heritage Data Explorer identified the Potomac Gorge (which generally follows the boundary of the Potomac River) as a conservation site within the study area, and Timberly Park, Scotts Run Stream Valley, and McLean Hamlet as locally managed conservation lands (VDCR, 2019b). VDCR also

identified the Legion Bridge Cave located along the Potomac River, on the edge of the study area boundary but outside of the LOD. This feature is about 15 feet from the edge of the river at normal flow. The cave is a pocket formed in the boulder pile at the bottom of a prominent cliff and appears to have been used as a shelter by people in the past, likely anglers.

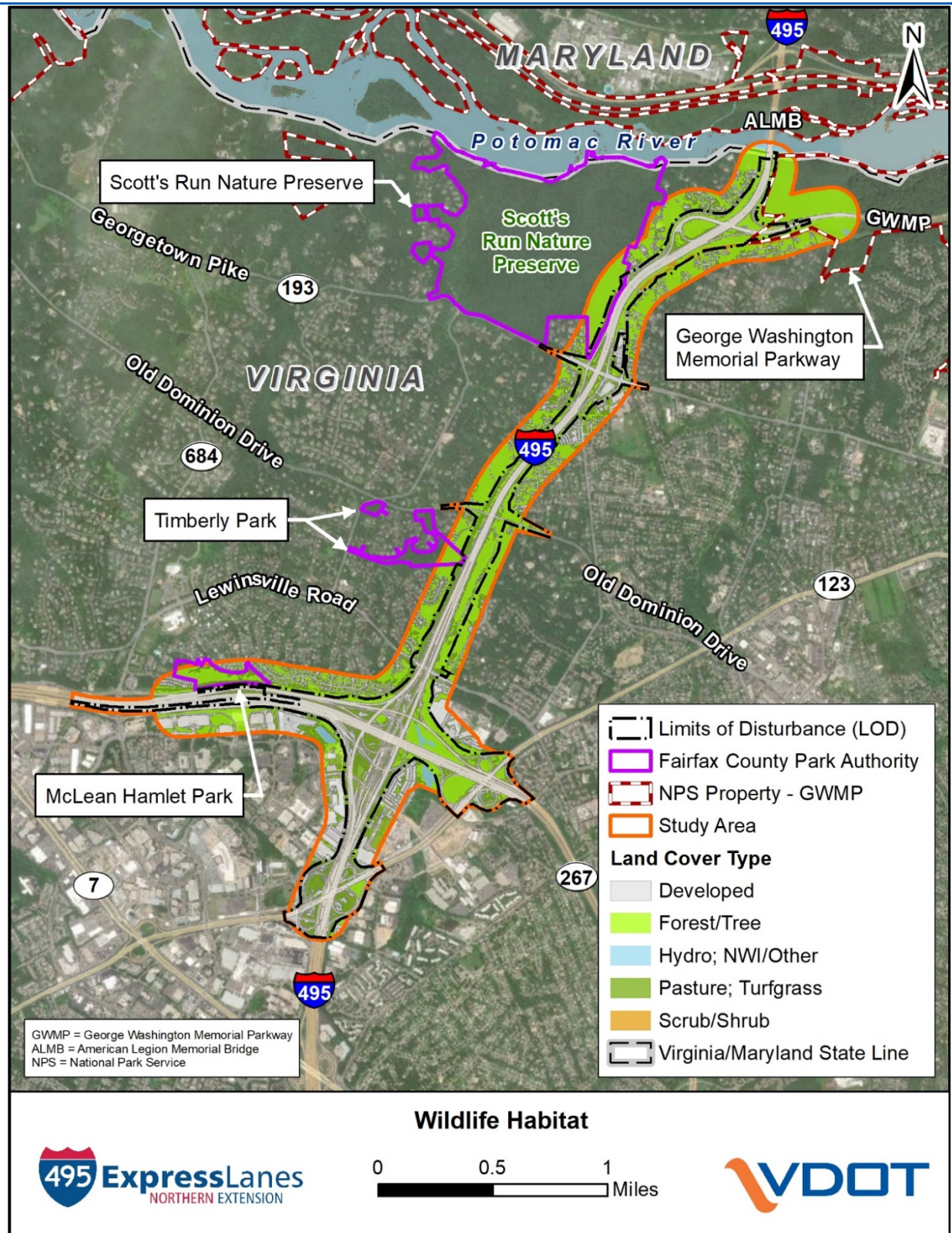


Figure 3-30. Available Wildlife Habitat



Culverts connecting streams under roadways offer limited passage, and the habitat fragments result in low-quality edge habitat. The edge habitat along the highway in the right-of-way, in interchange loops, and the area in the median is poor habitat for wildlife due to access restrictions posed by the travel lanes. The wildlife species most capable of adapting to habitat fragmentation outside of the fence line of the existing roadway are primarily species that are adapted to urban environments.

Based on the VDWR Virginia Fish and Wildlife Information Service (VaFWIS) database, there are 68 species likely to occur or confirmed to occur within a two-mile radius of the study area as detailed in the *I-495 Revised Natural Resources Technical Report* (VDOT, 2021c). Based on a review of scientific research papers recently made available by the NPS, there are more species likely to occur within the study area than those identified on the VDWR VaFWIS database. These species include 115 species of sawflies, 125 species of rove beetles, 41 species of leaf beetles, 2 species of cicada parasite beetles, 76 species of caddisflies, six species of aquatic snails, 27 species of fungus beetles, four species of ant-like leaf beetles, 222 moth species documented, ten species of checkered beetles, 110 species of ground beetle, 22 species of land snails and slugs, 37 species of longhorned beetles, 5 species of metallic wood-boring beetles, and 14 species of soldier beetles, all which are documented to occur within Turkey Run Park, a part of the GW Parkway which generally spans between I-495 and the CIA interchange on the GW Parkway<sup>15</sup> and is therefore partially within the LOD.

Of the species above that are found in Turkey Run Park, there is one species of sawfly (Smith, 2009), 25 species of rove beetles (Steury, 2017; Brattain et al., 2019; Steury and Brattain, 2020), one species of cicada parasite beetle (Evans and Steury, 2012), two caddisfly species (Flint, 2011), four species of fungus beetles (Steury 2018a), one species of ant-like leaf beetle (Steury, 2019), one species of moth (Steury et al., 2007), two species of ground beetle (Steury and Messer, 2014), five species of longhorned beetle (Steury, 2018b; Steury and MacRae, 2014), and seven species of soldier beetles (Steury et al., 2018) that are new to Virginia. There is one species of soldier beetle new to science that is known in the world only from Turkey Run Park (Steury, 2020). There are also five fly species (Mathis et al., 2009; Mathis and Zatwarnicki, 2010), one species of caddisfly (Flint and Kjer, 2011), and one amphipod species (Holsinger, 2009), newly discovered and described by science that occur in the project area<sup>17</sup>. Turkey Run Park has innumerable resources, some not known from anywhere else in the world, and others still awaiting discovery. According to the *Natural Heritage Resources of Virginia: Rare Animals* (Roble, 2020), the Appalachian springsnail (*Fontigens bottimeri*) is state listed as endangered and is documented to occur within Turkey Run Park (Steury, 2014). The Appalachian springsnail is discussed in more detail in **Section 3.16.1** due to its status as state endangered. Also, according to the *Natural Heritage Resources of Virginia: Rare Animals* (Roble, 2020), no other animal species listed above that have been documented within Turkey Run Park, besides the Appalachian springsnail, are state or federally listed as threatened or endangered. The *Natural Heritage Resources of Virginia: Rare Plants* (Townsend, 2021) was also evaluated and none of the species listed above that have been documented within Turkey Run Park are state or federally listed as threatened or endangered.

A Rare, Threatened, and Endangered (RTE) Plant Survey was completed in November 2020 by SHA as part of the I-495 and I-270 Managed Lanes Study (SHA, 2020). This portion of this survey conducted in

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<sup>15</sup> References for the scientific papers from which this information was obtained are included in Chapter 5.

Virginia identified two RTE species, buttercup scorpion-weed (*Phacelia covillei*) and Carey's sedge (*Carex careyana*). These species were identified within the lower upland terrace above the active floodplain of the Potomac River. According to the VDCR (VDCR, 2020), buttercup scorpion-weed is ranked as critically imperiled (S1) and Carey's sedge is ranked as vulnerable (S3) within Virginia. Neither of these species are federally or state listed in Virginia.

### 3.15.2 Environmental Consequences

#### *No Build Alternative*

Under the No Build Alternative, no project-related construction would occur, and therefore no changes to available wildlife habitat, existing land use, or habitat fragmentation levels would result. The existing width of the right-of-way corridor and highway barriers would remain unchanged.

#### *Build Alternative*

Approximately 233 acres of available wildlife habitat would be impacted, and 80% of this habitat is within existing right-of-way. The remaining affected area is adjacent to the existing transportation facility. There would be approximately 118 acres of tree clearing associated with the construction of the project due to the widening of the roadway, ramps, and interchange re-configurations, noise barriers, stormwater management facilities, and all other appurtenant structures. The loss of trees may result in reduced oxygen production and an increased temperature of microclimate due to the loss of canopy cover. Increasing the width of the roadway corridor would result in reduced habitat, although is not likely to increase habitat fragmentation as forested land would not be newly separated from contiguous forest. No elimination of existing wildlife passages is anticipated. The existing highway facility and other barriers currently prevent terrestrial wildlife from crossing the travel lanes, and currently existing corridors would be maintained by extending culverts and bridges, therefore no elimination of existing wildlife passages is anticipated. **Table 3-11** depicts available habitat types that are found within the LOD.

**Table 3-11. Available Wildlife Habitat in Study Area and Estimated Impacts of the Build Alternative**

Wildlife Habitat Type	Available Habitat (Acres)	Estimated Impacts to Available Habitat in LOD (Acres)
Forest/Tree	400.5	117.8
Hydro/NWI/Other	9.2	1.6
Turfgrass/Pasture	223.5	110.5
Scrub/Shrub	7.8	3.5
<b>Total</b>	<b>641.0</b>	<b>233.4</b>

Source: VGIN, 2016

Note: Where appropriate, some land cover types were combined to reflect similar types in total.

LOD = Limits of Disturbance; NWI = National Wetlands Inventory

Of the 233.4 acres of available habitat that is within the LOD, approximately 80% (187.9 acres) of consists of maintained or previously disturbed vegetation within the existing I-495 right-of-way. Because these maintained or previously disturbed lands may still provide some habitat function, impacts to all potential

wildlife habitat would be avoided and minimized to the maximum extent practicable. Only approximately 3% (7.3 acres) of the available wildlife habitat within the LOD is contained within protected lands that are adjacent to the I-495 corridor, including Scott's Run Nature Preserve managed by the FCPA and the GW Parkway managed by the NPS.

During agency scoping, the Potomac Gorge was identified as a conservation site by VDCR National Heritage Data Explorer. This resource generally follows the boundary of the Potomac River in both Maryland and Virginia. Work within this site may impact the natural heritage resources that are supported there. VDCR recommends limiting the project footprint in these areas to the maximum extent possible, and to conduct surveys to identify resources within areas proposed for disturbance so potential impacts can be more accurately evaluated. Necessary surveys and agency coordination would be completed later in project development and impacts to this resource would be avoided and minimized to the maximum extent practicable during more detailed design and permitting. VDCR also identified the Legion Bridge Cave located on the study area boundary along the Potomac River. VDCR recommended avoidance of this feature, stabilization of the soil around the site during every phase of the project, and that standard erosion control measures appropriate for the site be used at all times to help reduce any potential impact. This feature is not within the LOD, therefore impacts to the cave are not anticipated.

Turkey Run Park is located partially within the LOD as it generally spans between I-495 and the CIA interchange on the GW Parkway. As Turkey Run Park is part of the GW Parkway, impacts to the GW Parkway and Turkey Run Park would be minimized to the maximum extent practicable to avoid impacts to the rare and unique resources that have been documented within Turkey Run Park. Although minimal impacts are expected to the GW Parkway, numerous coordination meetings and letters between VDOT, NPS and the SHPO have occurred to minimize the visual and physical impacts to the GW Parkway, while incorporating elements of design that creates a gateway entrance to the GW Parkway off I-495. See **Section 3.7.3** for more information regarding coordination efforts for this resource.

### **3.16 THREATENED, ENDANGERED, AND SPECIAL STATUS SPECIES**

The Endangered Species Act (ESA) of 1973 and subsequent amendments and regulations define basic protections for federally-listed wildlife and plants that are considered threatened, endangered, or species of greatest conservation need. The law also affords protections to prescriptive habitat critical for protected species' survival, and applies to all federal, state, and privately-authorized projects or actions. The USFWS and the National Marine Fisheries Service (NMFS) are responsible for listing, protecting, and managing federally-listed threatened and endangered species. Under Section 7 of the ESA, federal agencies are required to consult with USFWS and NMFS to ensure that their undertakings do not adversely affect listed species and designated critical habitats.

The Virginia Endangered Species Act and the Endangered Plant and Insect Species Act of 1979 protect species that are listed as threatened or endangered at the state level. VDWR and Virginia Department of Agriculture and Consumer Services (VDACS) are responsible for administering and enforcing these regulations. In addition, a cooperative agreement with the USFWS, signed in 1976, recognizes VDWR as the designated state agency with regulatory and management authority over federally-listed animal species and provides for federal/state cooperation regarding the protection and management of those species (VDWR, 2019a; Gagnon et al., 2010). VDACS holds authority to enforce regulations pertaining to plants



and insects (VDACS, 2019). Species information for the study area is summarized below; more detail is in the *I-495 Revised Natural Resources Technical Report* (VDOT, 2021c).

### 3.16.1 Existing Conditions

Information on documented occurrences of federally-listed and state-listed threatened and endangered species was obtained through searches of the USFWS Information for Planning and Consulting (IPaC), the VDWR VaFWIS, and VDCR Department of Natural Heritage (DNH) online databases (and additional resources Roble, 2020 and Townsend, 2021). **Table 3-12** presents the species with confirmed occurrences within a 2-mile radius of the study area, along with each species' listed status and the source(s) of its listing. Potential habitat was verified in the study area for these species. The search results from the USFWS IPaC database show no critical habitat within the study area (USFWS, 2019a). The *Natural Heritage Resources of Virginia: Rare Animals* (Roble, 2020) was reviewed to identify the global ranks (G1-G3), state ranks (S1-S3), and federal or state listed status of threatened or endangered animal species with confirmed occurrences within a 2-mile radius of the study area, see **Table 3-12**. More information regarding the state and global rankings is included in the *I-495 Revised Natural Resources Technical Report* (VDOT, 2021c). According to the USFWS IPaC, no federally listed threatened or endangered plant species were identified to occur within the study area. According to VDCRDNH online databases, no state or federally listed threatened or endangered plant species were identified within a 100-foot buffer of the study area.

**Table 3-12. Threatened and Endangered Species Occurrences in Study Area**

Species*	Global Rank	State Rank	Status	Database	Additional Resources	Estimated Habitat Acres
Northern Long-Eared Bat ( <i>Myotis septentrionalis</i> )	G1G2	S1S3	FT, ST	VaFWIS, USFWS IpaC	Roble, 2020	401
Little Brown Bat ( <i>Myotis lucifugus</i> )	G3	S1S3	SE	VaFWIS	Roble, 2020	401
Tri-Colored Bat ( <i>Perimyotis subflavus</i> )	G2G3	S1S3	SE	VaFWIS	Roble, 2020	401
Wood Turtle ( <i>Glyptemys insculpta</i> )	G3	S2	ST	VaFWIS, VDCR-DNH	Roble, 2020	178

Species*	Global Rank	State Rank	Status	Database	Additional Resources	Estimated Habitat Acres
Appalachian Springsnail ( <i>Fontigens bottimeri</i> )	G2G3	S2S3	SE	Steury, 2014**	Roble, 2020	<1**

Source: VDWR, 2019b; USFWS, 2019d; VDCR, 2019g; VGIN, 2016; Roble, 2020; Townsend, 2021

\*The bald eagle is not included in this table because there are no confirmed or historic observations of these species within the study area. The rusty patched bumble bee is not included because its high and low potential areas have been identified outside of the study area.

\*\*An occurrence of the Appalachian springsnail was documented in Turkey Run Park in a scientific research paper made available by NPS. As this species is newly identified in Virginia, it was not listed by the VDWR VaFWIS database nor does VDWR provide a description of this species typical habitat.

G1/S1 = Critically imperiled; G2/S2 = Imperiled; G3/S3 = Vulnerable; FT = Federally Threatened; SE = State Endangered; ST = State Threatened; USFWS IPaC = United States Fish and Wildlife Service Information for Planning and Consultation; VaFWIS = Virginia Fish and Wildlife Information Service; VDCR-DNH = Virginia Department of Conservation Resources-Department of Natural Heritage

USFWS expressed no concerns regarding species identified in the study area during coordination with them in December 2018 or December 2019. DCR identified the Potomac Gorge as a conservation site within the study area but did not identify any threatened or endangered species (see **Section 3.15.1**). VDWR recommended performing an updated search of bald eagle nests using the Center for Conservation Biology (CCB) website, adhering to protocols for bat habitat assessment and protection, and distributing standard awareness guidance for the state threatened wood turtle to all VDOT staff and contractors.

*Bald Eagle*—Review of USFWS Virginia Field Office mapping (USFWS, 2019b) and the Center for Conservation Biology (CCB) Virginia Eagle Nest Locator database indicate that the study area is not within or adjacent to any bald eagle concentration areas or bald eagle nest locations (CCB, 2019). The closest known bald eagle nest to the study area is located approximately 3.3 miles east of the study area. As the study area does not intersect with a bald eagle concentration area and it is not anticipated that project-related activities would disturb nesting bald eagles, no Eagle Act Permit is required for this project.

*Northern Long-Eared Bat (NLEB)*—While no documented occurrences of NLEB were identified in the VDWR VaFWIS report, the study area is within the range of the federally threatened NLEB. The study area is not within the vicinity of any known hibernacula or maternity roosts, with the nearest hibernaculum located 86.5 miles away (VDWR, 2019b). However, suitable summer habitat for the NLEB is present throughout the study area as depicted in **Figure 3-31** and quantified in **Table 3-12**.

*Little Brown Bat and Tri-colored Bat*—The VDWR VaFWIS report identified documented occurrences of the little brown bat and the tri-colored bat, both state-listed as endangered, within a two-mile radius of the study area (VDWR, 2019d). The study area is not within the vicinity of any known hibernacula or maternity roosts, and therefore, per VDWR protocols, no habitat assessment is required for these bat species, and incidental take of these species is not prohibited (VDWR, 2019d). Suitable summer habitat for the little brown bat and the tri-colored bat is present throughout the study area as depicted in **Figure 3-31** and quantified in **Table 3-12**.

*Rusty Patched Bumble Bee (RPBB)*—VDCR-DNH identified the federally-listed endangered RPBB as historically occurring within the study area (VDCR, 2019b), and the USFWS RPBB Map did not identify

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the study area as being an area where the RPBB may be present. Fairfax County is considered to be part of the RPBB historic range, although no observations of RPBB have been documented since before 2000.

*Wood Turtle*—According to the VDWR VaFWIS the wood turtle has been documented within several streams within a 2-mile radius of the study area, including Turkey Run, Difficult Run, and Pimmit Run. Suitable habitat for this species within the study area includes riparian areas along the Potomac River, Dead Run, Turkey Run, and Scott Run, as depicted in **Figure 3-31**, and the estimated total acreage of this species' potential habitat in the study area is included in **Table 3-12**.

*Appalachian Springsnail*—Based on a review of scientific research papers provided by the NPS, the Appalachian springsnail (*Fontigens bottimeri*) is also listed as state endangered and has been documented to occur within Turkey Run Park, a part of the GW Parkway and located partially within the LOD. As this species is newly identified in Virginia, it was not listed by the VDWR VaFWIS database nor does VDWR provide a description of this species typical habitat. The aquatic snail was identified along seeps and edges of small streams in Turkey Run Park (Steury, 2014), while Hershler and colleagues identified caves and small springs as typical habitat (Herschler, 1990).

### 3.16.2 Environmental Consequences

#### *No Build Alternative*

Under the No Build Alternative, no project-related construction would occur, and therefore no changes to populations of threatened or endangered species, or their respective habitats, would result.

#### *Build Alternative*

The total impacts to threatened and endangered species habitat are shown in **Table 3-13**. Information regarding each species specifically and how they may be impacted by the Build Alternative is discussed below.

*Bald Eagle*—No impacts to bald eagles are anticipated. This conclusion would be reviewed again if and when a federal permit is requested for this project. If a bald eagle nest is identified at a later date, appropriate agency coordination would occur to determine if an Eagle Act permit from the USFWS would be required.

*Northern Long-Eared Bat*—The Build Alternative would result in the clearing of approximately 118 acres of forested areas that serve as suitable summer habitat for the federally-listed threatened NLEB. The majority of tree clearing would occur within 300 feet of existing roadways, with the exception of the proposed relocation of Scott Run south of Old Dominion Drive. Forest clearing along the edge of the existing right-of-way would result in minimal reduction in forested cover and quality of forested habitat. Clearing of forested habitat within interchanges and smaller fragmented forest areas would result in the removal of sub-optimal habitat that has a low potential for roosting and generally does not provide suitable commuting and foraging corridors for the NLEB. No confirmed maternity roosts or hibernacula are located within a two-mile radius of the study area (VDWR, 2019b), further limiting the potential effects on this species. Conservation and protection measures for the NLEB would be in accordance with the Final 4(d) Rule and the Programmatic Biological Assessment for Transportation Projects in the Range of the NLEB. The Final 4(d) Rule modifies protections to the NLEB in areas affected by white-nose syndrome (WNS) and is designed to protect the species while minimizing regulatory requirements for landowners, land managers, government agencies, and others within its range. Because Fairfax County is located in the



NLEB’s range and WNS Zone (per Final 4(d) Rule updated July 10, 2020, to include the NLEB’s entire range), additional coordination with the USFWS Virginia Field Office regarding impacts to the NLEB would be required before construction to ensure the project operates in accordance to the regulatory provisions for the NLEB within the WNS Zone.

*Little Brown Bat and Tri-Colored Bat*—Tree clearing could impact potential summer habitat for the state-listed endangered little brown bat and tri-colored bat. Forest clearing along the edge of the existing right-of-way would result in minimal reduction in forested cover and quality of forested habitat. Clearing of forested habitat within interchanges and smaller fragmented forest areas would result in the removal of sub-optimal habitat that has a low potential for roosting and generally does not provide suitable commuting and foraging corridors for these species. No confirmed maternity roosts or hibernacula are located within a two-mile radius of the study area (VDWR, 2019e).

Therefore, incidental take of these species is not anticipated. Prior to construction, additional coordination would be undertaken with VDWR to identify any necessary conservation measures to minimize impacts to these species.

*Rusty Patched Bumble Bee*—The study area is not designated as an area where this species may be present. If RPBBs are identified within the LOD at a later date, appropriate agency coordination would be required.

*Wood Turtle*—As discussed in **Section 3.12.2** and **3.14.2**, the Build Alternative would result in impacts to streams, wetlands and floodplains that contain potential habitat for the wood turtle. VDWR’s Virginia Fish and Wildlife Information Service identified confirmed observations of the wood turtle within a 2-mile radius of the study area, but no known observations within the study area. During coordination with VDWR in February 2020, they recommended distributing standard awareness guidance for the wood turtle to all VDOT staff and contractors.

To reduce potential impacts to threatened and endangered species and their respective habitats, efforts to minimize the construction footprint would be considered. Construction practices would avoid the removal of existing vegetation to the greatest extent possible and include the implementation of best management practices for erosion and sediment control, as well as stormwater management, to reduce potential impacts to adjacent habitats, terrestrial and aquatic species, and properties.

**Table 3-13. Estimated Threatened and Endangered Species Potential Impacts Within LOD**

Species*	Estimated Habitat (Acres)	Approximate Potential Impacts (Acres)
Little Brown Bat	400.5	118.0
Tri-Colored Bat	400.5	118.0
Northern Long-Eared Bat	400.5	118.0
Wood Turtle	123.0	70.0

Source: VGIN, 2016

\*The rusty patched bumble bee, the bald eagle and migratory birds are not included in this table because there are no confirmed observations of these species within the study area.

LOD = Limits of Disturbance

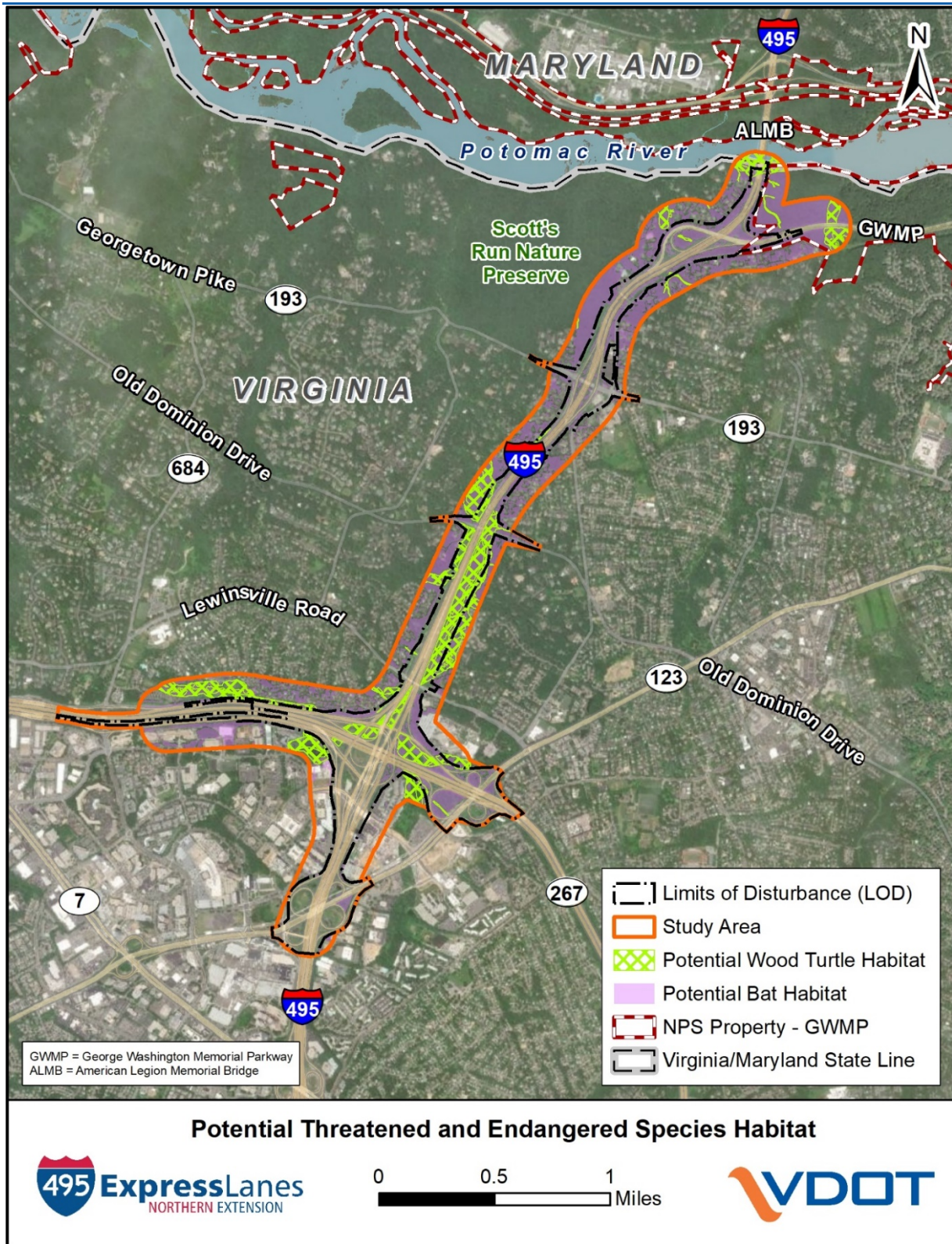


Figure 3-31. Potential Habitat for Threatened and Endangered Species within the Study Area

### 3.17 HAZARDOUS MATERIALS

#### 3.17.1 Existing Conditions

Environmental Data Resources, Inc. (EDR) was utilized to perform a search of state and federal regulatory agency databases within a half-mile radius from the study area (Hazardous Materials Study Area) and the results were compiled in a Corridor Report (EDR, 2018). A total of two High Priority sites, 29 Moderate Priority sites, and 108 Low Priority sites were identified, as shown in **Figure 3-32**. For additional information, refer to the *I-495 Hazardous Materials Technical Memorandum* (VDOT, 2020b).

#### 3.17.2 Environmental Consequences

##### *No Build Alternative*

Under the No Build Alternative, no project-related construction would occur, and therefore no impacts to hazardous material sites would result.

##### *Build Alternative*

Further assessment of Moderate and High Priority sites and the correlation to the final design limits of disturbance would be conducted. Low priority sites would not be studied further due to the low level risk of impacts based on the type or classification of the hazardous material site. The future assessment would include a review of reasonably ascertainable documentation pertaining to the Moderate and High Priority sites, including but not limited to submitting Freedom of Information Act requests to relevant agencies and reviewing the documentation provided. The purpose of this further assessment is to characterize in greater detail the nature of the potential concerns and to determine if further investigation is warranted, namely Phase II Environmental Assessment activities including soil and groundwater sampling. Any future assessment of Moderate and High Priority sites and any necessary remediation would be conducted in compliance with federal and state environmental laws and would be coordinated with the USEPA, VDEQ, and other regulatory agencies, as necessary. The potential impacts would not influence FHWA's NEPA decision. Undocumented hazardous materials that are encountered during construction efforts would be managed, handled, and disposed of in accordance with federal, state, and local regulations.

Nine low priority sites, four moderate priority sites, and two high priority sites were identified within the LOD.

##### Low Priority Sites

- 7900 Westpark Drive, McLean
- 7918 Jones Branch Drive, McLean
- 1680 Capital One Drive, McLean
- 7950 Jones Branch Drive, McLean
- 1764 Old Meadow Lane, McLean
- 1760 Old Meadow Road, McLean
- 1750 Old Meadow Road, McLean
- 1200 Old Dominion Court, McLean
- 1550 Tysons McLean Drive, McLean

##### Medium Priority Sites

- 7705 Lear Road, McLean
- 7701 Lear Road, McLean
- 1575 Anderson Road, McLean
- 7920 Jones Branch Drive, McLean

##### High Priority Sites

- 7900 Westpark Drive, McLean
- 7926 Jones Branch Drive, McLean



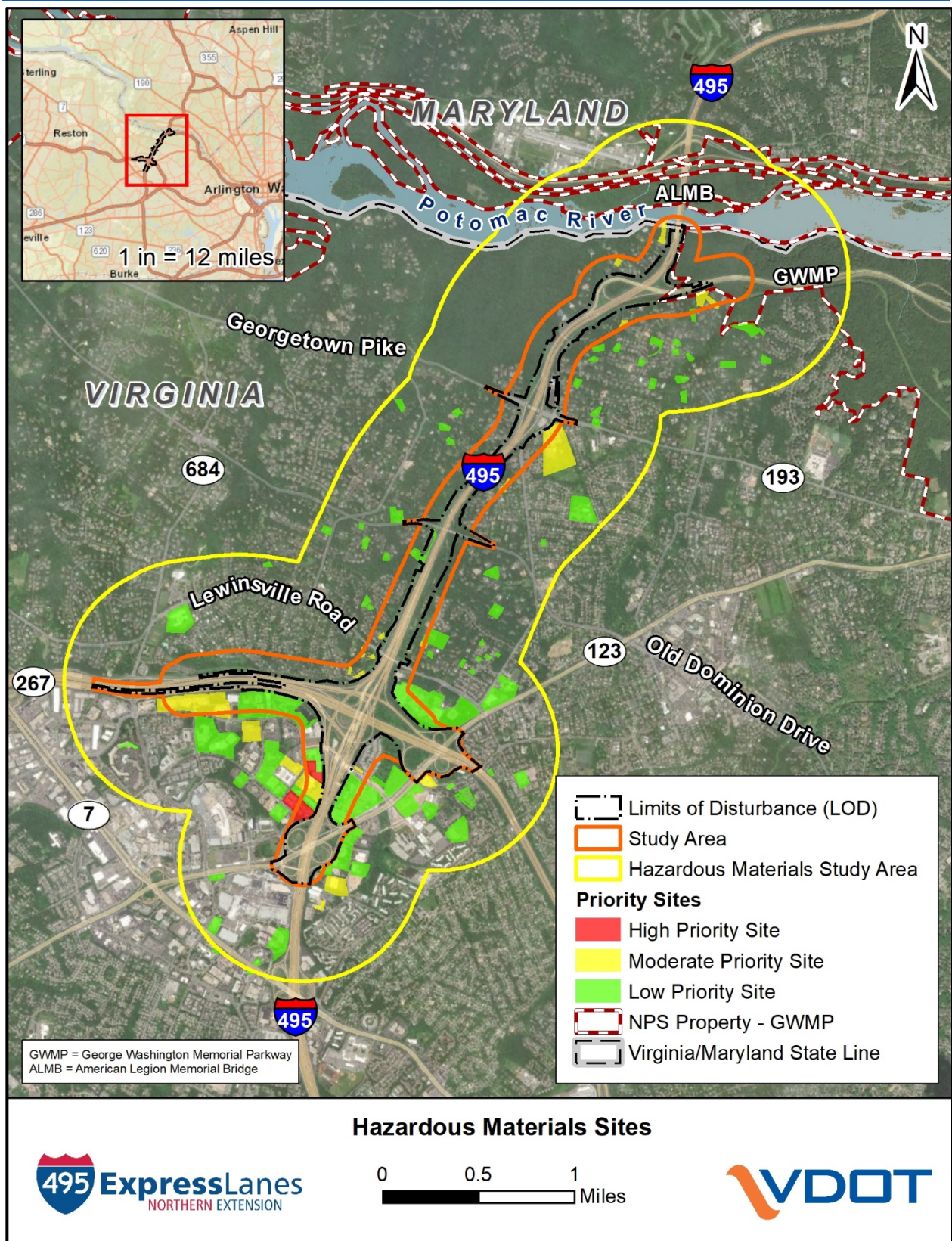


Figure 3-32. Hazardous Materials Sites

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### 3.18 INDIRECT AND CUMULATIVE EFFECTS

The NEPA legislation does not mention indirect effects or cumulative impacts; however, the Council on Environmental Quality (CEQ) regulations for implementing NEPA address federal agency responsibilities applicable to indirect and cumulative considerations, analysis, and documentation (40 CFR 1508.25) in the content requirements for the environmental consequences section of an Environmental Impact Statement (EIS) (40 CFR 1502.16) (FHWA, 2003). In addition to CEQ’s regulations, indirect and cumulative effects must be evaluated in accordance with the requirements and processes outlined in other regulations and guidance documents such as the FHWA regulations for *Environmental Impact and Related Procedures* (23 CFR Part 771), *Position Paper on Secondary and Cumulative Impact Assessment* (FHWA, 1992), and others.

For additional information on methodology or findings, refer to the *I-495 Revised Indirect and Cumulative Effects Technical Report* (VDOT, 2021b).

#### 3.18.1 Indirect Effects

CEQ defines indirect effects as “...effects which are caused by the action and are later in time or farther removed in distance but are still reasonably foreseeable. Indirect effects may include growth-inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems” (40 CFR 1508.8(b)). These induced actions are those that may or may not occur without the implementation of the proposed project.

Specific study areas were developed to evaluate indirect effects for each of the following resource categories: induced growth, socioeconomic resources, natural resources, and historic resources. The limits of these Indirect and Cumulative Effects (ICE) study areas are shown on **Figure 3-33** and the results of this analysis is discussed below. Other impacts that could be considered to be indirect—such as visual and aesthetic viewshed changes—are included in the discussion within each resource topic as applicable.



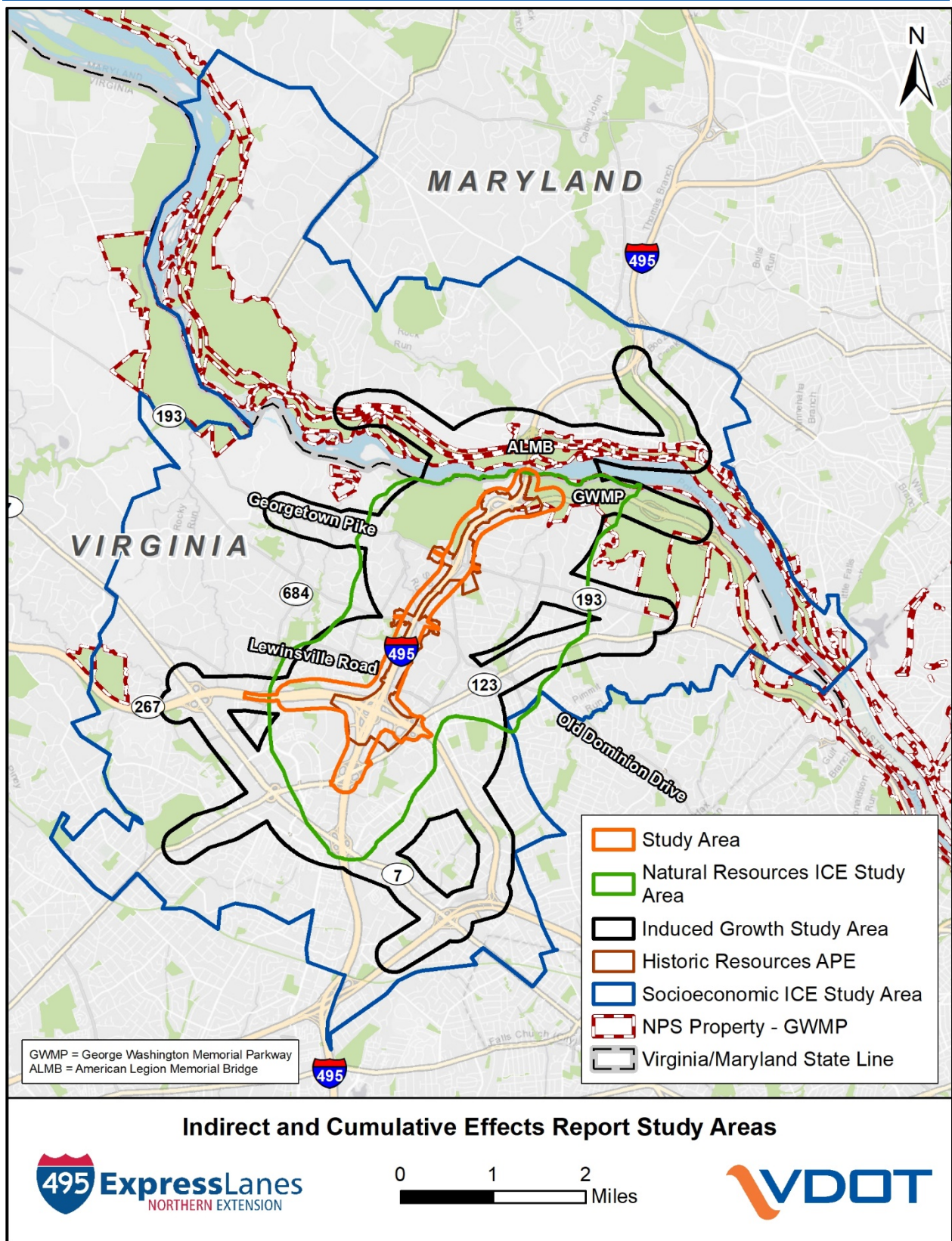


Figure 3-33. Indirect and Cumulative Effects Report Study Areas



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**No Build Alternative**Effects to Socioeconomic Resources

Congestion and travel unreliability currently affect travelers on I-495 as well as the communities adjacent to I-495 because overflow traffic often uses alternate local routes during times of heaviest congestion. The No Build Alternative would not address congestion and travel unreliability needs, and therefore resulting issues are expected to continue, including delayed delivery of goods and services, restricted access to commercial activities, and lost economic productivity due to workers and the local community being delayed by traffic congestion. Existing congestion on I-495 may ultimately make Tysons and other commercial centers near the study area less attractive to potential employees, shoppers, and diners. Increased congestion would also result in more visual, noise, and air impacts that could reduce community mobility and reduce access to community facilities and recreation areas that would be borne by all users of the corridor.

No induced growth would be expected as a result of the No Build Alternative. The Socioeconomic Resources ICE Study Area and surrounding localities are already developing and are planning the area for continued development. Land near existing interchanges may also become less desirable due to continued traffic congestion and diminishing travel reliability. Therefore, no effects from induced growth are anticipated.

Effects to Natural Resources

Existing development within the watersheds could continue to contribute to overall surface water impairments within the project's study area. No induced growth would be expected as a result of the No Build Alternative.

Effects to Historic Resources

Access to certain historic properties that are open to public visitation could also become more difficult, such as the GW Parkway, making them less attractive for the public to visit.

**Build Alternative**Effects to Socioeconomic Resources

*Land Use:* The temporary and permanent right-of-way requirements would be limited primarily to narrow strips adjacent to existing I-495 in the study area. Proposed right-of-way acquisition would not change overall land use in the area; therefore, the Build Alternative would have minimal indirect effects on land use. The Build Alternative is not anticipated to encourage or accelerate land use changes that are not already expected by the localities within the study area. The construction of the Build Alternative is unlikely to create pressure on public officials to make changes to land use plans or allow types of development in areas not currently approved for it or to allow greater development densities since improvements to I-495 have been studied for several decades. Per the *Fairfax County Comprehensive Plan*, Tysons may experience an increase in density, but these increases are anticipated regardless of improvements on I-495.

*Communities and Community Cohesion:* The Build Alternative does not include any new lanes or accesses to the community and would not result in new fragmentation or isolation of any communities. In addition, extending the Express Lanes would not increase the separation distance between communities located on either side because the lanes would be mostly constructed within the existing road right-of-way. Local

roadways that parallel the improved I-495 study area could see traffic volume reductions, as drivers divert from existing surface streets onto the improved I-495 corridor where they could find better travel conditions. This could result in an indirect benefit to communities from the Build Alternative.

*Economy:* Users on I-495 in the Socioeconomic Resources ICE Study Area would experience improved travel time and travel reliability. This would benefit people and businesses by reducing lost productivity from sitting in congested traffic. In addition, increases in job opportunities could be expected due to short-term construction hiring and long-term operation and maintenance of the new improvements. Employment opportunities near the study area would become more attractive to qualified workers in a greater geographic area who were previously deterred by long travel times, boosting employment growth and productivity within the study area and the region as a whole.

The Build Alternative would extend Express Lanes, requiring single-occupancy vehicles and other vehicles not meeting HOV occupancy requirements to pay a variable toll to use the Express Lanes. The existing GP lanes would remain free for travelers using the facility. In addition, the extension of the managed lanes system may encourage carpooling in the area, allowing HOV users to take advantage of the Express Lanes for free.

*Environmental Justice (EJ):* The transportation improvements would positively impact all communities, including EJ populations. Since the tolled lanes are being added and not converted from existing general-purpose use, the project is anticipated to benefit users of both the Express Lanes and GP lanes. This reduction in travel time may also result in air quality impacts which would positively impact all communities. Transit users along the corridor would receive additional benefits since these buses would travel toll free along the Express Lanes. Therefore, a disproportionately high or adverse impact is not anticipated on EJ communities.

*Induced Growth:* No induced growth would be expected as a result of the Build Alternative because this project does not propose new access points to undeveloped land and is located within an almost completely built-out urban environment.

#### Effects to Natural Resources

*Water Resources:* Direct impacts to streams and wetlands may also result in indirect impacts to offsite streams and wetlands due to hydrologic alteration or isolation. Portions of wetlands or streams which extend outside of the LOD may be subject to indirect impacts if their hydrology is altered due to direct impacts occurring within the LOD. If hydrology is maintained to the portions outside of the LOD, these wetlands would likely retain proper functions such as providing habitat, water quality benefits, and biogeochemical services. Culvert extensions and piping of existing streams would straighten existing flow patterns, remove vegetation, and eliminate other in-stream features such as riffles and plunge pools, which could potentially increase stream velocity and cause erosion and scouring downstream. Culvert extensions would prevent full habitat fragmentation by maintaining habitat corridors through already fragmented areas.

The increase in impervious surface area has the potential to adversely affect water quality, streams, wetlands, floodplains, aquatic habitats, and anadromous fish use waters occurring in the Natural Resources ICE Study Area. Increased impervious surface from the Build Alternative can increase runoff volume and velocity. Runoff from roadways could contain heavy metals, salt, organic compounds, and nutrients, which could facilitate the degradation of nearby terrestrial and aquatic habitat through deposition of sediments or

contamination from chemical pollutants. This can result in accelerated changes in the microbenthic community structure and composition, which in turn can affect the fish and amphibian populations that rely on them as a food source, as well as the birds and aquatic mammals that prey on the fish and amphibians. Potential indirect impacts to natural resources during construction include erosion and sedimentation or accidental spills of hazardous materials from construction equipment. Modern temporary and permanent stormwater management measures, including ponds, sediment basins, vegetative controls, and other measures would be implemented, in accordance with the Virginia Stormwater Management Program and applicable guidance, to minimize potential degradation of water quality due to increased impervious surface and drainage alteration. These measures would reduce or detain discharge volumes and remove many pollutants before discharging into the receiving impaired water.

*Floodplains:* Construction of the Build Alternative could potentially cause long-term minor adverse indirect impacts to floodplains by altering existing drainage patterns and flood flows. However, with adequately sized culverts and bridges, no indirect effects to floodplains would be anticipated.

*Wildlife Habitat:* Portions of wetlands or streams which extend outside of the LOD may be subject to indirect impacts if their hydrology is altered due to direct impacts occurring within the LOD and may contribute to habitat fragmentation.

Based on the VDWR VaFWIS database, there are 68 species likely to occur or confirmed to occur within a two-mile radius of the study area. Based on a review of scientific research papers provided by the NPS, there are more species likely to occur within the study area than those identified on the VDWR VaFWIS database, many of which have been documented to be in Turkey Run Park, part of the GW Parkway.

The right-of-way is located within an already developed area, with extensive portions developed for residential, commercial, or industrial purposes which has led to less natural forest cover and an increase in impervious surfaces and turfgrass. The existing roadway forms major habitat fragmentation of forested areas posing a virtually impenetrable barrier to crossings by terrestrial species due to vehicle strikes and the presence of fence lines that bound the highway. Culverts connecting streams under roadways offer limited passage, and the habitat fragments result in low-quality edge habitat. Due to this existing fragmentation along the corridor, no additional fragmentation is expected to occur under the Build Alternative. As vegetation is cleared along the outside edges of the current I-495 travel lanes, the Build Alternative would extend into already fragmented forested areas. Therefore, the Build Alternative would not create any additional fragmented forested areas but reduce the amount of available forested land within the overall footprint of the study area itself, and the existing fragmented condition would remain.

Increases in impervious surface area has the potential to adversely affect both aquatic and terrestrial wildlife habitat by increasing runoff volume and velocity. Runoff from roadways can contain a variety of pollutants which can contribute to the degradation of nearby habitats through the deposition of sediments or contamination from chemical pollutants. However, construction of stormwater facilities would serve to neutralize the pollution impacts.

*Threatened, Endangered, and Special Status Species:* Impacts to threatened, endangered, and special status species would be similar to the impacts described to wildlife, except that the life history characteristics of threatened, endangered, and special status species tend to render them less resilient when faced with habitat loss or alteration or competition from invasive species. Even so, the indirect effects would be minor, given that there is anticipated to be minimal direct impacts to potentially suitable habitat for threatened,



endangered, or special status species and no known occurrences of these species have been documented within the LOD (see the *I-495 Revised Natural Resources Technical Report* [VDOT, 2021c] for more information). In addition, any known occurrences of these species are far enough away from the LOD that any indirect effects would be negligible.

As discussed above, there is no causal relationship between the Build Alternative and induced growth or development. Therefore, no indirect impacts to water resources, floodplains, threatened, endangered, special status species, and wildlife can be attributed to induced growth as a result of this project. Should future growth and development in the vicinity of the Build Alternative interchanges and feeder roads impact any of the above, individual development would be subject to review, approval, and permits from local, state, or federal agencies (including the USACE) before any impacts would occur. New development in previously developed areas could be required to replace outdated stormwater control and drainage systems and replace impervious surfaces with more permeable surfaces, lessening impacts to water quality that may otherwise occur.

#### Effects to Historic Resources

During construction, access to historic properties could be temporarily impacted by temporary road closures, detours, and loss of parking, potentially affecting visitation. These construction effects would be short term and therefore minor.

As discussed above, there is no causal relationship between the Build Alternative and induced growth or development. Therefore, no indirect impacts to cultural resources can be attributed to induced growth as a result of this project. Development projects funded, permitted, or on lands controlled by federal and state agencies must take into account effects on historic properties by complying with Section 106 of the NHPA and the Virginia Antiquities Act and Burial Law, respectively. These processes would reduce the potential adverse effects to historic properties from future growth and development within the study area.

#### **3.18.2 Cumulative Effects**

CEQ defines cumulative effects as “the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions. Cumulative effects can result from individually minor but collectively significant actions taking place over a period of time” (40 CFR 1508.7). Cumulative effects include the total of all impacts, direct and indirect, experienced by a particular resource that have occurred, are occurring, or would likely occur as a result of any action or influence, including effects of a federal activity (USEPA, 1999).

#### ***No Build Alternative***

The No Build Alternative would not contribute to cumulative impacts. Under the No-Build Alternative, existing water surface impairments would continue as well as the continued loss of natural resources due to present and ongoing developments but would not result from implementation of the No Build Alternative. Without adding capacity to I-495, congestion would continue to increase and may negatively impact adjacent and parallel routes. This may also lead to negative economic and social consequences as drivers may reduce trips in the area or completely avoid the area due to the congestion. Therefore, the No Build Alternative would likely have a minor adverse cumulative effect on communities, community facilities, and

EJ populations. This lack of improvement would be felt by all residents, including minority populations, and thus would not impact minority populations disproportionately.

### ***Build Alternative***

Past growth and development have diminished natural resources, and intensification of land use in the region has resulted in adverse impacts to water quality; loss of wetlands, streams, and floodplains; wildlife population loss from overexploitation and loss of habitat; fragmented habitat; and degraded habitat quality. This has led to some species becoming threatened and endangered with extinction. Federal, state, and local regulations enacted over the last 50 years have done much to slow the loss of remaining wildlife and wildlife habitat, improve wildlife habitat and water quality, and recover protected species. These regulations require consideration of avoidance, minimization, and mitigation of adverse impacts to natural resources. Conservation efforts have also positively contributed to natural resources in the region, such as Scott's Run Nature Preserve, the GW Parkway, local parks, RPAs, and other conservation easements and holdings.

The Build Alternative is anticipated to support continued growth and development in and around the study area. The Build Alternative's contribution to cumulative effects for community facilities and recreational resources would be minor because the direct and indirect effects would be minor. It is also anticipated that the Build Alternative would have no effect on community cohesion since no new physical barriers to neighborhood connectivity would be introduced.

The Build Alternative could result in short-term reduced water quality, floodplain impacts, and forestland and wetland impacts, but should be minimized by implementation of state-mandated BMPs and conformance with current stormwater regulations. Therefore, the Build Alternative is unlikely to substantially contribute to the further impairment of any impaired waterbody. The Build Alternative's cumulative effect on protected species and their habitat would be mitigated through coordination with permitting agencies and minimized with avoidance measures.

It is anticipated that the Build Alternative would have a minor cumulative contribution to adverse impacts to protected species in the study area through use of these measures.

All effects to archaeological and historic architectural properties, including indirect effects, have been considered. Projects to improve or maintain historic resources have taken place, such as the NPS preserving natural stone guard walls and adding new walls with a similar character along the GW Parkway. Adjacent developments may detract from the viewshed of the resources, though these would be done in coordination with the NPS when these projects are state or federally funded. Transportation improvements may also increase visitation to historic properties open to the public, sustaining historic resources tourism and providing incentives for preservation.

Since the region is already developed, protected (e.g., government owned land, parkland, and conservation lands) or already expected to be developed by the encompassing localities, overall cumulative effects of the Build Alternative are expected to be minimal. In addition, current regulatory requirements and planning practices are helping to avoid or minimize the contribution of present and future actions to adverse cumulative effects for socioeconomic, natural, and historic resources.

## Chapter 4.0 COORDINATION AND COMMENTS

### 4.1 AGENCY COORDINATION

Pursuant to 23 CFR § 771.111 and the Council on Environmental Quality (CEQ)'s Memorandum for General Counsels, National Environmental Policy Act (NEPA) Liaisons, and Participants in Scoping, the Virginia Department of Transportation (VDOT), in cooperation with the Federal Highway Administration (FHWA), has coordinated with local, state, and federal entities, as well as engaged in public involvement efforts throughout the development of the Environmental Assessment (EA) and this Revised EA. Scoping activities began in June 2018 when the EA was initiated. During that time, VDOT mailed scoping letters and questionnaires to state, federal, and local agencies and organizations to obtain pertinent information and data, as well as to identify key issues regarding the potential environmental impacts for this study. The letters and questionnaires related to issues within the recipient's purview were mailed to the following government agencies:

#### 4.1.1 Federal/Regional

- Metropolitan Washington Airports Authority
- Metropolitan Washington Council of Governments, Department of Transportation Planning
- National Oceanic and Atmospheric Administration
- United States Army Corps of Engineers
- United States Coast Guard
- United States Department of Agriculture, Natural Resource Conservation Service
- United States Department of Homeland Security, Federal Emergency Management Agency
- United States Department of Housing and Urban Development
- United States Department of the Interior, Fish and Wildlife Service
- United States Department of the Interior, National Park Service
- United States Department of the Interior, Office of Environmental Policy and Compliance
- United States Department of Transportation, Federal Aviation Administration
- United States Department of Transportation, Federal Highway Administration
- United States Environmental Protection Agency
- Washington Metropolitan Area Transit Authority

#### 4.1.2 State

- Chesapeake Bay Local Assistance Department
- Virginia Department of Agriculture and Consumer Services
- Virginia Department of Aviation
- Virginia Department of Conservation and Recreation
- Virginia Department of Emergency Management
- Virginia Department of Environmental Quality
- Virginia Department of Forestry
- Virginia Department of Wildlife Resources (formerly the Virginia Department of Game and Inland Fisheries)
- Virginia Department of Health



- Virginia Department of Historic Resources
- Virginia Department of Housing and Community Development
- Virginia Department of Mines, Minerals, and Energy
- Virginia Department of Rail and Public Transportation
- Virginia Economic Development Partnership
- Virginia Marine Resources Commission
- Virginia Outdoors Foundation
- Virginia State Police

**4.1.3 Local Government**

- Fairfax County
  - Chair of the Board of Supervisors
  - County Executive
  - Director of the Department of Transportation
  - Executive Director of the Park Authority
- Fairfax County Economic Development Authority
- Fairfax Water
- Maryland Department of Transportation State Highway Administration (SHA)
- Montgomery County, Department of Transportation
- Northern Virginia Regional Park Authority
- Northern Virginia Soil and Water Conservation District

**4.1.4 Other**

- Chesapeake Bay Foundation
- The Nature Conservancy
- Transurban

**4.2 AGENCYSCOPING RESPONSES**

In response to the scoping letters, VDOT received responses from a number of agencies identifying transportation needs, environmental resources, and other relevant factors to be analyzed in the EA. **Table 4-1** provides a summary of the responses received. Copies of the correspondence are provided in **Appendix B**.

**Table 4-1. Agency Scoping Responses**

Agency	Scoping Response
<b>DEQ Division of Land Protection and Revitalization (DLPR)</b>	July 2018 – Response from DLPR identified 21 petroleum releases within the project area which might impact the project. DLPR recommends that these cases be further evaluated by the project engineer or manager to establish the exact location, nature and extent of the petroleum release.

Agency	Scoping Response
<b>DEQ Office of Environmental Impact Review (OEIR)</b>	June 2018 – Response indicated that the OEIR is responsible for coordinating Virginia’s review of federal environmental documents prepared pursuant to NEPA and responding to appropriate federal officials on behalf of the Commonwealth. OEIR also coordinates Virginia’s review of federal consistency documents prepared pursuant to the Coastal Zone Management Act. A list of databases that may be helpful in the preparation of a NEPA document was included.
<b>Fairfax County Board of Supervisors</b>	June 2018 – Response indicated that the County is not aware of any organized opposition to the project. Noted the project is consistent with the <i>Fairfax County Transportation Plan</i> ; although some of the impacts would occur in existing and planned residential use, mixed use and/or park areas, it is a high priority project for the County. The proposal should meet Comprehensive Plan Environmental Policies to reduce disturbance in environmentally sensitive areas. Strongly recommended upholding stormwater management and water quality controls above the minimum requirements.
<b>Fairfax County Land Development Services</b>	July 2018 – Response identified natural resources within the project area and described regulations administered by Land Development Services relating to the work. Indicated that designs meeting the requirements of the Code of Fairfax County are anticipated to have no significant environmental impacts.
<b>Fairfax County Park Authority (FCPA)</b>	August 2018 – Response indicated a very high-level review of the project which identified Scotts Run Nature Preserve, Timberly Park, and McLean Hamlet Park are located within the project area, as well as Falstaff Park which is located just outside the project area. Impacts to trail connections and noise impacts were two concerns expressed. Addressed in the letter was guidance on applicable permits and recommendations regarding historic sites, Section 4(f), and Section 6(f). VDOT must acquire a Letter of Permission and/or Easement from FCPA to do any clearing and grading or drainage improvement on adjacent parkland.
<b>Fairfax Water</b>	July 2018 – Response identified Washington Aqueduct’s Little Falls intake downstream of the project area, of which Fairfax is a wholesale customer. Potential for contamination of public water supply include spills from vehicles using the highway and application of de-icing chemicals. Fairfax Water is not aware of any known public health issues related to this project.

Agency	Scoping Response
<p><b>Metropolitan Washington Airports Authority (MWAA)</b></p>	<p>July 2018 – Response expressed two projects related to MWAA that may be affected by the proposed project:</p> <ul style="list-style-type: none"> <li>• Widening of the Dulles Airport Access Road (DAAR) to three lanes in each direction.</li> <li>• Construction of Ramp 3 as referenced in the Memorandum of Agreement between VDOT and MWAA for the improvement of access between the Dulles Toll Road (DTR) and DAAR and Capital Beltway dated May 7, 2010.</li> </ul> <p>The project would not require an update to the Dulles Airport Layout Plan (ALP). VDOT will need to coordinate with MWAA if any changes to the existing DTR MS4 stormwater discharge permit are required and may require a construction permit from MWAA if any work will occur on federal land under lease to MWAA.</p>
<p><b>National Oceanic and Atmospheric Administration (NOAA)</b></p>	<p>August 2018 – Response indicated that no aquatic resources under jurisdiction of NOAA will be affected by the project. Expressed that they participate in interagency VDOT meetings concerning projects such as this and are available to discuss the project should water work be proposed.</p>
<p><b>Northern Virginia Soil &amp; Water Conservation District</b></p>	<p>September 2018 – Response emphasized the importance of implementing and maintaining adequate erosion and sediment controls before and through construction and expressed willingness to help with the development and review of stormwater runoff and erosion control plans. Indicated some concerns including potential adverse effects to natural resources within Scott’s Run Watershed and potential changes to outer limits of Scott’s Run Nature Preserve due to increased impervious areas. Noted previous community controversy related to loss of vegetative screening during construction of the prior I-495 NEXT project from I-95 to Tysons. Also, recommended specific seed mix options which would not include invasive or exotic plant species.</p>
<p><b>U.S. Department of Agriculture – Natural Resources Conservation Service (NRCS)</b></p>	<p>July 2018 – The project area is identified as urban and would not be considered prime or unique farmland. The project would increase potential soil erosion and stormwater runoff. Recommended use of straw mulches or temporary nurse crops until permanent seedlings become established, as well as holding and sediment basins to store and slow release of stormwater from pavement to alleviate flooding issues.</p>



Agency	Scoping Response
<p align="center"><b>United States Army Corps of Engineers (USACE)</b></p>	<p>July 2018 – Response requested the USACE participate as a cooperating agency in the preparation of the EA and designated FHWA as the lead federal agency. The response also indicated the following recommendations and comments:</p> <ul style="list-style-type: none"> <li>• The study area should be large enough to include any indirect downstream effects or cumulative effects the watershed has experienced.</li> <li>• VDOT should obtain information regarding impaired waters including the basis for their designation as impaired, which may provide helpful information for establishing a geographic study area for the analysis of potential indirect and cumulative effects to streams.</li> <li>• VDOT should consider dates of construction of the interstate systems and any adjacent highways in setting a past date for evaluating cumulative effects.</li> <li>• There are valid permits and the potential for preliminary jurisdictional determinations of delineated wetlands and/or waters of the U.S. within the proposed project area.</li> <li>• The environmental document should discuss avoidance and minimization measures considered in the design development.</li> <li>• Recommend coordination with local VDOT district offices to insure identification of any mitigation sites and/or preservation sites within the study area.</li> <li>• Potential induced growth, economic development and investment, and improved stormwater management should be considered as the study is developed.</li> <li>• Recommend coordination with the draft sections of the EA prior to publishing the document.</li> </ul>
<p align="center"><b>United States Department of Housing and Urban Development (HUD)</b></p>	<p>July 2018 – Response indicated that the project would not affect any neighborhood programs, properties, or projects under the jurisdiction of the District of Columbia Field Office. The response provided positive comments regarding improved travel times on I-495 because of the project, and no negative indirect effects were identified. HUD concurred on economic and social data provided and agreed that the target corridor does not appear to negatively impact any protected class communities.</p>

Agency	Scoping Response
<p align="center"><b>United States Department of the Interior – National Park Service (NPS)</b></p>	<p>July 2018 – Response requested Cooperating Agency status on the project due to the project’s proximity and potential impacts to two units of the national park system; George Washington Memorial Parkway (GW Parkway) and Potomac Heritage National Scenic Trail. The response recommended the following:</p> <ul style="list-style-type: none"> <li>• A 600-foot buffer should be used in determining direct, indirect, and cumulative impacts to natural resources.</li> <li>• Traffic analysis should consider traffic impacts to the GW Parkway due to the project.</li> <li>• Area of Potential Effects for cultural resources should consider direct and indirect impacts due to the project.</li> <li>• The rehabilitation of the northern section of the GW Parkway and the rehabilitation of the American Legion Memorial Bridge<sup>1</sup> (ALMB) would both impact traffic along the GW Parkway and should be considered in the traffic analysis and cumulative impact analysis.</li> <li>• The GW Parkway is considered a Section 4(f) property and any impacts would require analysis to determine feasibility and to identify mitigation measures.</li> <li>• Any actions requiring an NPS decision require that the NEPA and National Historic Preservation Act (NHPA) studies and documents be done in a manner easily adoptable by the NPS. Frequent collaboration with the NPS was advised.</li> </ul>
<p align="center"><b>United States Department of Transportation – Federal Aviation Administration (FAA)</b></p>	<p>July 2018 – Response expressed that the project is located outside the defined airport boundary for Washington Dulles International Airport, but within access highway leased to the Metropolitan Washington Airports Authority (MWAA). The project will need to be coordinated with MWAA. Equipment exceeding 200 feet in height would require notification to FAA.</p>
<p align="center"><b>United States Environmental Protection Agency (EPA)</b></p>	<p>July 2018 – The response recommended a clear and robust justification of the purpose and need for the project in the EA, and the alternatives analysis should explain why only one build alternative is being evaluated. Recommended potential impacts to the natural and human environment be described in depth and that adverse impacts be avoided and minimized.</p>
<p align="center"><b>United States Fish and Wildlife Service (USFWS)</b></p>	<p>January 2020 – Response indicated that the office has no further comments on the project and concurs with the determinations made through USFWS and VDWR online databases and geographic information system (GIS) mapping services.</p> <p>July 2018 – Response indicated that the office no longer provides individual responses to requests for environmental reviews, but that their website should be consulted in order to come to the appropriate conclusion regarding minimizing impacts and applying for and receiving appropriate permits.</p>

<sup>1</sup> Please note that the NPS referenced the rehabilitation of the Arlington Memorial Bridge in their scoping response. It is understood that the reference should have been in relation to the American Legion Memorial Bridge.

Agency	Scoping Response
<b>Virginia Department of Agriculture and Consumer Services (VDACS)</b>	July 2018 – VDACS does not anticipate any impacts to farmland because of this project. VDACS suggests that VDOT contact Fairfax County to determine if they have any established agricultural and forestal districts that may be impacted by this project. Response asks that VDOT be mindful of actions that could result in altering the water flow within surrounding agricultural lands and to minimize adverse drainage or erosion issues that may result.
<b>Virginia Department of Aviation</b>	July 2018 – The response indicated no anticipated impacts to any airport in the Commonwealth as a result of the project. If any crane or structure reaches a height of 200’ above ground level, the FAA will require a Form 7460 to be completed.
<b>Virginia Department of Conservation and Recreation (DCR)</b>	December 2019 – DCR has identified the Potomac Gorge Conservation Site within the study area which has several natural heritage resources of concern. DCR recommended limiting the project footprint in these areas to the maximum extent possible, and to conduct surveys to identify resources within areas proposed for disturbance so potential impacts can be more accurately evaluated. DCR noted the proposed project would fragment two C4 Ecological Cores, areas of unfragmented natural cover with at least 100 acres of interior. Recommended minimizing fragmentation to the maximum extent practicable. The project would not affect any documented state-listed plants or insects.
	July 2018 – DCR has identified the Potomac Gorge Conservation Site as being located within the project area. The wood turtle is identified as a natural heritage resource of concern occurring within this conservation site. The rusty patched bumble bee (RPBB) has also been historically documented within the project area. DCR recommends coordination with the Virginia Department of Game and Inland Fisheries for management and protection of the wood turtle, and USFWS voluntary measures for conservation of the RPBB.
<b>Virginia Department of Environmental Quality (DEQ) Air Division</b>	August 2018 – DEQ recommended that emissions of volatile organic compounds and oxides of nitrogen generated from construction activities be minimized, and that state air pollution regulations may be applicable.
<b>Virginia Department of Forestry (VDOT)</b>	July 2018 – Response noted that the primary forestry concern is within the Fairfax County Park Authority and NPS forest resources along the Potomac River at the north end of the project. Recommends minimizing loss of mature trees and increase in impervious surfaces, along with other recommendations to alleviate erosion and stormwater runoff issues. Also recommends eliminating non-native species from its stabilization seed mix.



Agency	Scoping Response
<p><b>Virginia Department of Wildlife Resources (VDWR) – formerly the Virginia Department of Game and Inland Fisheries (VDGIF)</b></p>	<p>February 2020 – Response indicated that due to current staffing limitations VDWR is unable to review and provide comments on projects not currently involved in one of the regulatory review processes for which they are a consultative agency. Recommended performing an updated search of bald eagle nests using the Center for Conservation Biology website, adhering to standard protocols for bat habitat assessment and protection, and distributing standard awareness guidance for the state threatened wood turtle to all VDOT staff and contractors.</p>
	<p>July 2018 – Response indicated that due to current staffing limitations VDWR is unable to review and provide comments on projects not currently involved in one of the regulatory review processes for which they are a consulting agency.</p>
<p><b>Virginia Department of Health Office of Drinking Water</b></p>	<p>July 2018 – Response identified no public groundwater wells within a 1-mile radius and no surface water intakes within a 5-mile radius of the project area. The project is not within the watershed of any public surface water intakes and there are no apparent impacts to public drinking water sources due to the project.</p>
<p><b>Virginia Department of Housing and Community Development</b></p>	<p>July 2018 – Response indicated no impacts to economic development or low-income housing due to the project, and no concerns were expressed regarding economic development in connection with the project.</p>
<p><b>Virginia Department of Rail and Public Transportation</b></p>	<p>July 2018 – Response indicated no existing transit operations within the study area, and that the proposed project could be beneficial to any future bus transit service that may be implemented near the extension. Recommended VDOT consider its own data on the impact to travel times and speeds of the current HOT and express lanes in Northern Virginia.</p>
<p><b>Virginia Outdoors Foundation (VOF)</b></p>	<p>July 2018 – Response referenced no existing or proposed VOF open-space easements within the immediate vicinity of the project.</p>
<p><b>Washington Metropolitan Area Transit Authority (WMATA)</b></p>	<p>July 2018 – Response indicated that the WMATA Silver Line would be directly impacted by the project and that the project design should be coordinated closely with WMATA’s Office of Joint Development and Adjacent Construction to ensure maintenance of WMATA structures. The project may decrease Metrorail ridership by increasing ease of driving, although it may also provide conditions for new transit service across the ALMB in the future. The response also desires minimization of barriers to bike and pedestrian traffic to maintain connectivity around Tysons.</p>

ALP = Airport Layout Plan; DAAR = Dulles Airport Access Road; DCR = Virginia Department of Conservation and Recreation; DLPR = Virginia Department of Environmental Quality Division of Land Protection and Revitalization; DTR = Dulles Toll Road; EA = Environmental Assessment; EPA = Environmental Protection Agency; FAA = Federal Aviation Administration; FCPA = Fairfax County Park Authority; FHWA = Federal Highway Administration; GW Parkway = George Washington Memorial Parkway; HOT = high-occupancy toll; HUD = United States Department of Housing and Urban Development; MWAA = Metropolitan Washington Airports Authority; NEPA = National Environmental Policy Act; NHPA = National Historic Preservation Act; NOAA = National Oceanic and Atmospheric Administration; NPS = National Park Service; NRCS = Natural Resources Conservation Service; OEIR = Virginia Department of Environmental Quality Office of Environmental Impact Review; RPBB = rusty patched bumble bee; USACE = United States Army Corps of Engineers; USFWS = United States Fish and Wildlife Service; VDACS = Virginia Department of Agriculture and Consumer Services; VDGIF = Virginia Department of Game and Inland Fisheries; VDOT = Virginia Department of Transportation; VDWR = Virginia Department of Wildlife Resources; VOF = Virginia Outdoors Foundation; WMATA = Washington Metropolitan Area Transit Authority

### 4.3 STAKEHOLDER TECHNICAL ADVISORY GROUP

A number of agencies participated in the Stakeholder Technical Advisory Group (STAG) (see list below). The STAG met four times prior to the publication of the EA in February 2020: on June 7, 2018, October 22, 2018, May 9, 2019, and February 10, 2020. The first meeting introduced the project background and scope of the study, stakeholder and agency coordination, and the project schedule. The second meeting addressed project goals, existing conditions, a project update, and major milestones in the project schedule. The third meeting presented the preliminary build alternative, draft initial operational results for the 2045 horizon year, a project update, and revised major milestones in the project schedule. The fourth meeting presented updates to the preliminary build alternative, traffic operational results for the 2025 and 2045 horizon years, a project update, and revised major milestones in the project schedule. It also served as a preview of the information to be presented at the Public Hearing originally scheduled for March 12, 2020 and postponed until October 2020 due to the COVID-19 pandemic.

Additional partnering and coordination meetings with local, regional, state, and federal agencies took place throughout the project development process.

#### ***Stakeholder Agencies and Organizations:***

- Capital Beltway Express LLC (Transurban)
- Fairfax County Department of Transportation
- Fairfax County Park Authority
- Federal Highway Administration
- Maryland Department of Transportation
- Metropolitan Washington Airports Authority
- Metropolitan Washington Council of Governments
- National Park Service
- Northern Virginia Transportation Authority
- United States Army Corps of Engineers
- Virginia Department of Rail and Public Transportation

Cooperating agencies include those government and regulatory agencies with jurisdiction by law (e.g., with permitting or land transfer authority) or special expertise with respect to any environmental impact or resource involved in an environmental review or alternative for study. Both the USACE and the NPS requested and are participating as cooperating agencies on the project.

### 4.4 SECTION 106 CONSULTATION

Pursuant to Section 106 of the National Historic Preservation Act (54 U.S.C. §306108) (NHPA) invitations were sent to the following Native American organizations and Indian tribes inviting them to be Section 106 consulting parties for the I-495 NEXT project:

- Chickahominy Tribe
- Chickahominy Tribe Eastern Division
- Delaware Nation
- Monacan Indian Nation
- Nansemond
- Pamunkey
- Rappahannock Tribe

- Upper Mattaponi

No Native American organizations nor Indian tribes responded to the Section 106 consultation request.

Due to the anticipated impacts of the Build Alternative to the GW Parkway – an NPS Park and Section 106 resource – Section 106 Consulting Parties were consulted, including VDOT, NPS, and VDHR (the State Historic Preservation Officer). Meetings that took place in coordination with NPS and meetings considered Section 106 Consulting Party meetings are listed in **Table 4-2**. As part of this Section 106 consultation process, visualizations were prepared to illustrate the proposed changes within GW Parkway property and to the viewshed from points along the GW Parkway. A booklet of these visualizations was included with materials in the October 2020 Public Hearing. Through the Public Hearing process, the public was given the opportunity to provide input on the Section 106 process. Following coordination with the agencies involved in the Section 106 consultation, a determination of “No Adverse Effect” to historic properties was made by VDOT. NPS concurred with this determination in a letter on October 20, 2020, and VDHR concurred with this determination in a letter on January 21, 2021. Both letters are included in **Appendix D**.

**Table 4-2. NPS and Section 106 Consulting Party Meetings**

Date	Meeting	Attendees
4/4/2019	Coordination with NPS	Maryland Department of Transportation (MDOT), NPS
4/22/2019	Meeting with Superintendent of GW Parkway	NPS
6/12/2019	Meeting with NPS	NPS
6/20/2019	Pre-meeting Assessment of Conditions	NPS, MDOT
6/24/2019	Assessment of Conditions - GW Parkway with NPS	NPS, MDOT
8/21/2019	Meeting with NPS and MDOT	NPS, MDOT
10/16/2019	Meeting with Dept Historic Resources	VDHR
10/21/2019	Coordination Meeting with MDOT/VDOT	MDOT, FHWA, NPS
12/16/2019	Meeting with GW Parkway	NPS
1/23/2020	Meeting with NPS	NPS
2/6/2020	Meeting with NPS	NPS
9/14/2020	NPS Permitting Discussion	NPS
1/19/2021	NPS Meeting	NPS

FHWA = Federal Highway Administration; MDOT = Maryland Department of Transportation; NPS = National Park Service; VHDR = Virginia Department of Historic Resources

## 4.5 PUBLIC INVOLVEMENT

Public involvement efforts for the I-495 NEXT project included two Public Information Meetings (PIM) and a Public Hearing. VDOT uses these meetings as public participation tools for certain EAs as a way to keep the public informed of study updates and to provide the public a chance to raise questions and speak with VDOT representatives. Prior to publication of the EA, PIMs were held at Cooper Middle School, 977 Balls Hill Road, McLean, Virginia on June 11, 2018, and May 20, 2019, from 6:30 p.m. to 8:30 p.m.



The project Location and Design Public Hearing was initially scheduled for March 12, 2020 but was postponed due to the COVID-19 pandemic state of emergency declaration. Following publication of the EA, and prior to the rescheduled Public Hearing, VDOT held two virtual public question-and-answer sessions on September 28 and 30, 2020. In October 2020, VDOT hosted a Location and Design Public Hearing with virtual and in-person components (October 5 and 8, 2020, respectively) due to the COVID-19 pandemic, as outlined in **Section 4.5.4**. Additionally, VDOT co-hosted a virtual public meeting in cooperation with the Virginia Department of Rail and Public Transportation (DRPT) and the Maryland Transit Administration (MTA) on November 18, 2020 regarding the separate I-495 American Legion Bridge Transit Study. VDOT also held small group meetings with stakeholders in the project area, such as homeowners' associations, citizens associations, elected officials, and other interested parties. These meetings are outlined in **Appendix G**.

#### **4.5.1 Public Information Meetings**

##### ***June 11, 2018***

The June 2018 PIM was designed to introduce the study to the public, share available information, and gather public input for consideration during the development of the EA (February 2020). Advertisements for the PIM were published in the *Washington Post*, *McLean Connection*, and *El Tiempo Latino*. Additionally, notice for the PIM was given on VDOT's website and all PIM materials were posted to the website at least 15 days prior to the meeting date. Display boards depicting general information on the study, existing conditions, the study background and goals, the scope of the EA, the environmental assessment procedures, and the project schedule were available for review and discussion with project team staff during an open house period, followed by a presentation and a question-and-answer session with VDOT representatives.

Comment sheets and informational brochures were provided at the meeting and were made available on the [495NorthernExtension.org](http://495NorthernExtension.org) project website on June 11, 2018. The public was invited to submit comments at the meeting in writing, individually to a court reporter, verbally during the question-and-answer session, or by regular mail, email, or online form.

The public comment period ended on July 11, 2018. Approximately 76 people attended the meeting and 48 people signed the attendance sheet, including four elected officials, an elected official's aide, and a representative from one media outlet. Nine comment sheets were submitted at the meeting, 12 people spoke during the question-and-answer session, and no individual comments were provided to the court reporter. VDOT received 11 comments through regular mail, email, or online form. Comments expressed questions and concerns regarding coordination with Maryland and the District of Columbia, environmental impacts, nature of the design, traffic impacts, process, and procurement of funds.

##### ***May 20, 2019***

Advertisements for the May 20, 2019 PIM were published in the *Washington Post*, *McLean Connection*, and *El Tiempo Latino*. The May 2019 PIM included an open house period for the public to review displays and ask questions, followed by a presentation and question-and-answer session. The purpose of this meeting was to provide updates on findings of the study, present preliminary design information, and give updates on the EA schedule and project delivery. Comment sheets and informational brochures were provided at the meeting and were made available on the project website ([495NorthernExtension.org](http://495NorthernExtension.org)) on May 20, 2019. The public was invited to submit comments at the meeting in writing, individually to a

court reporter, verbally during the question-and-answer session or by regular mail, email, or online form. The deadline for received comments to be included in the meeting summary was initially set for June 10, 2019, but was extended until June 18, 2019.

Approximately 225 people were in attendance and 207 people signed in, including four elected officials, one elected official's aide, representatives from several media outlets, and representatives from the Maryland Department of Transportation. Seven comment sheets were submitted at the meeting, 23 people spoke during the question-and-answer session, and no individual comments were provided to the court reporter. VDOT received 110 comments were by regular mail, email or online form. Comments and questions received during the comment period (May 1, 2019 to June 18, 2019) covered a broad range of topics including questions about the coordination with Maryland, need for evaluating traffic impacts on surrounding neighborhood roads, need for ALMB improvements, concerns about impacts to Scott's Run Nature Preserve and the GW Parkway, support for bike and pedestrian improvements, effectiveness of express lanes, noise impacts, right of way impacts, and the need for continued public involvement.

A summary of comments and responses to the substantive comments received are included in **Appendix C** as well as individual correspondence from organizations received prior to distribution of the EA.

#### **4.5.2 Distribution of the EA, Technical Reports, and Design Public Hearing Plans**

The EA, supporting Technical Reports, and corresponding Design Public Hearing Plans (the review package) were made available on February 26, 2020 for public review and comment at local libraries, at offices of local elected officials, and on the project website. The review package was also distributed to federal, state, local agencies, and local elected officials.

Access to government buildings was modified multiple times due to the COVID-19 pandemic. After closure of the McLean Governmental Center to the public, materials were moved to the McLean Community Center. Second sets of materials were provided at library locations to accommodate decontamination guidelines for print materials in place at the time for Fairfax County libraries.

Hard copies of the report were made available at the following locations:

- VDOT Northern Virginia District Office (4975 Alliance Drive, Fairfax)
- McLean Governmental Center, Office of Fairfax County Dranesville District Supervisor (materials relocated to McLean Community Center [1234 Ingleside Avenue, McLean])
- Fairfax County Government Center - Department of Transportation (12000 Government Center Parkway, Fairfax)
- Dolley Madison Library (1244 Oak Ridge Avenue, McLean)
- Tysons-Pimmit Regional Library (7584 Leesburg Pike, Falls Church)
- Great Falls Library (9830 Georgetown Pike, Great Falls)

Correspondence received from agencies following distribution of the February 2020 EA is included in **Appendix D** with the responses that were provided by VDOT, and summarized in **Table 4-3**.

Correspondence received from elected officials and organizations following distribution of the EA is included in Appendix E with responses that were provided by VDOT, and summarized in

**Table 4-4.** The Commonwealth of Virginia Secretary of Transportation's recent commitment to providing transit between Virginia and Maryland across the ALMB is a reasonably foreseeable future action. This commitment is detailed in a letter from the Secretary to the Fairfax County Board of Supervisors to the

Fairfax County Board of Supervisors on November 30, 2020 expressing the Commonwealth’s intent to include future transit service as part of the overall I-495 corridor operations, under a separate project (see **Appendix D**). Reference the *I-495 NEXT Indirect and Cumulative Effects Technical Report* for more information on this reasonably foreseeable improvement.

**Table 4-3. Correspondence from Agencies Following Distribution of the EA**

Agency/Organization	Date Received	Subject
Environmental Protection Agency	12/4/2020	EA comments
Fairfax County Park Authority	6/9/2020	Section 4(f) and 6(f)
Fairfax County Park Authority	12/4/2020	EA Comments
Fairfax County Park Authority	5/17/2021	Section 4(f) <i>de minimis</i> Concurrence
National Park Service	4/29/2020	Section 106 determination
National Park Service	10/5/2020	EA comments
National Park Service	5/6/2021	Section 4(f) <i>de minimis</i> Concurrence
Virginia Department of Cultural Resources	10/22/2020	Technical letter
Virginia Department of Historic Resources	1/14/2021	Section 106 determination

**Table 4-4. Correspondence From Local Officials and Organizations Following Distribution of the EA**

Agency/Organization	Date Received	Subject
Adventist HealthCare Letter	10/13/2020	Letter of Support
Alexandria Chamber of Commerce	10/12/2020	Letter of Support
Apartment and Office Building Association of Metropolitan Washington	9/30/2020	Letter of Support
Arlington Chamber of Commerce	10/14/2020	Letter of Support
Capital One	9/22/2020	Letter of Support
Fairfax Alliance for Better Bicycling	12/4/2020	Project Comments
Fairfax County Board of Supervisors	10/8/2020	Public Engagement Period Extension Request
Fairfax County Board of Supervisors	12/3/2020	EA Comments
Fairfax County Board of Supervisors	12/3/2020	Design Comments – Letter to Secretary
Fairfax County Board of Supervisors	2/23/2021	Project Comments
Fairfax County Board of Supervisors	4/13/2021	Endorsement of I-495 NEXT Project
Great Falls Citizens Association	5/3/2020	Project Comments
Great Falls Citizens Association	11/30/2020	Additional Project Comments
Greater Reston Chamber of Commerce	4/6/2020	Letter of Support
Greater Springfield Chamber of Commerce	10/12/2020	Letter of Support



Agency/Organization	Date Received	Subject
Greater Washington Partnership	11/9/2020	Project Comments
Holy Trinity Church	10/2/2020	Property Impacts
Honorable Terence R. McAuliffe	10/5/2020	Letter to Secretary
McLean Citizens Association	9/2/2020	EA Comments
McLean Citizens Association	9/10/2020	Letter to Secretary
Mount Vernon Chamber of Commerce	10/12/2020	Letter of Support
NAIOP Northern Virginia Chapter	3/18/2020	Letter of Support
National Parks Conservation Association	11/24/2020	Project Comments
Northern Virginia Building Industry Association	9/28/2020	Letter of Support
Northern Virginia Chamber of Commerce	3/11/2020	Letter of Support
Northern Virginia Citizens Association	12/4/2020	Project Comments
Northern Virginia Transportation Alliance	10/5/2020	Letter of Support
Prince William Chamber of Commerce	3/11/2020	Letter of Support
Saigon Citizens Association	4/15/2020	Project Comments
Senator Howell	3/11/2020	Letter of Support
Senator Marsden	10/6/2020	Letter to Secretary
Senator Saslaw	10/5/2020	Letter of Support
Sierra Club Great Falls Group	4/17/2020	Project Comments
Sierra Club Great Falls Group	8/27/2020 and 12/3/2020	Comments about Bi-State Accord
Sierra Club Great Falls Group	9/30/2020	Project Comments
Southern Environmental Law Center	5/8/2020	Project and EA Comments
Timberly South Neighborhood	10/5/2020	Project Comments
Tysons Partnership	12/4/2020	Project Comments
Tysons Regional Chamber of Commerce	11/17/2020	Letter of Support
Virginia Chamber of Commerce	10/29/2020	Letter to Secretary
Virginia Transportation Construction Alliance	10/8/2020	Letter of Support
Virginians for Better Transportation	10/15/2020	Letter of Support
Virginia Transit Association	9/30/2020	Letter of Support
Washington Airports Task Force	10/26/2020	Letter of Support

#### 4.5.3 Virtual Question-and-Answer Session on I-495 NEXT Project

Prior to hosting the October 2020 Public Hearing, VDOT held two virtual question-and-answer sessions on September 28 and 30, 2020, from 7 to 9 p.m. for the public to ask questions about the I-495 NEXT project following a brief presentation about the preliminary design and study findings in the EA. The sessions were hosted virtually using WebEx due to the COVID-19 pandemic and were informal in nature. Discussions held during these meetings were not entered into the formal Public Hearing record, as VDOT indicated in at the start and end of both question-and-answer session.

#### **4.5.4 Joint DRPT/VDOT Virtual Public Information Meeting on I-495 American Legion Bridge Transit Study**

Concurrently with the I-495 NEXT project, DRPT and MTA were conducting an ongoing study of the I-495 corridor and ALMB regarding multimodal transportation options to reduce congestion, improve trip reliability and regional connections, and enhance existing and planned multimodal mobility and connectivity on I-495 and the ALMB. VDOT and DRPT hosted an additional virtual public meeting on November 18, 2020, from 7 to 9 p.m. to provide information and answer questions about the I-495 NEXT project and the ongoing study by DRPT and MTA. Although this meeting was not part of the I-495 NEXT project, VDOT presented informational highlights on the I-495 NEXT project (similar to the October 2020 Public Hearing) as part of this meeting, which was held using WebEx.

#### **4.5.5 Location and Design Public Hearing**

VDOT held a Location and Design Public Hearing for this study on October 5 and 8, 2020. The purpose of the hearing was to present the findings of the EA, receive comment from the public, and allow additional discussion between the public and the project team. Due to the COVID-19 pandemic, the Public Hearing held on October 5, 2020, was hosted virtually using WebEx, which also allowed participation online and by phone, as well as viewing live and afterward using YouTube.

The Public Hearing held on October 8, 2020, was held in-person, by appointment only, at the McLean Community Center (1234 Ingleside Avenue, McLean, Virginia) from 4 to 8 p.m. VDOT project team members were available in-person with additional team members available to answer questions through Microsoft Teams. A presentation was provided during both Public Hearing and comments received during both hearing dates were entered into the formal Public Hearing record.

In addition, public comments were accepted until December 4, 2020, which was beyond the minimum 30-day public comment period required following the notice of availability of the EA (on February 26, 2020), and 60 days following the October 5, 2020 Public Hearing. All comments received during the Public Hearing and public comment period became part of the Public Hearing record. A summary of the public comments received and responses to the comments is included in **Appendix F**. Individual comments received, responses to those comments, and meeting transcripts are posted on the project public website at [http://www.495northernextension.org/public\\_meetings/](http://www.495northernextension.org/public_meetings/). Comments received from agencies, elected officials, and organizations are summarized in **Section 4.5.3** and included in **Appendix E**.

#### **4.5.6 Additional Coordination and Public Involvement Efforts**

##### ***Small Group and Agency Coordination Meetings***

Multiple small group meetings were held with coordinating agencies and various other stakeholders throughout the development of the I-495 NEXT project. VDOT has held 23 meetings with elected officials, 109 meetings with stakeholders and agencies, 22 meetings with homeowners and business associations, and 22 one-on-one meetings with property owners. These meetings are listed in **Appendix G**.

##### ***Mailing List***

Three rounds of property access letters were mailed to property owners in the vicinity of the study area. The initial round of letters was sent to all property owners whose parcels were within or intersected the study area. The second round of letters was sent to 43 property owners whose parcels intersected wetland and stream features within the study area that needed to be reexamined to complete the Preliminary

Jurisdictional Determination (PJD) package sent to the USACE. The final round of letters was sent to 104 property owners whose parcels intersected any wetland or stream feature within the study area.

This final round of letters notified property owners of a site visit on December 12, 2019, between USACE and VDOT representatives. These letters informed property owners that an agent of VDOT may need to access their property to survey the area's topographic features and property boundaries; identify wetlands; undertake stream studies; conduct environmental drilling (to collect soil and groundwater samples for analysis); or perform other transportation design-related evaluations and environmental assessments, which could include taking photographs and collecting environmental samples. In the letter, VDOT requested the property owners to notify tenants, if also living or working on the property, about potential activities.

The letter included contact information for the VDOT Project Manager in the event that the property owner had concerns regarding entry or wanted to request advanced notification prior to field work being conducted on the property. Requests for advanced notice or other information was noted by the project team and honored during field visits.

***Website***

Information for the study, including the EA, this Revised EA, and all technical documentation, is available to the public through the following VDOT website:

<https://www.495northernextension.org/>

The website is regularly updated as new information becomes available.



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## CHAPTER 6.0 ACRONYMS

AADT	Average Annual Daily Traffic
AASHTO	American Association of State Highway and Transportation Officials
ADT	Annual Daily Traffic
ALMB	American Legion Memorial Bridge
ALP	Airport Layout Plan
APE	Area of Potential Effects
BG	Block Group
BMP	Best Management Practice
CAA	Clean Air Act
CBPA	Chesapeake Bay Preservation Act
CBPO	Chesapeake Bay Preservation Ordinance
CCB	Center for Conservation Biology
C-D	Collector-Distributor
CO	Carbon Monoxide
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CLRP	National Capital Region Constrained Long Range Plan
CT	Census Tract
CTB	Commonwealth Transportation Board
CWA	Clean Water Act
CZMA	Coastal Zone Management Act
DAAR	Dulles Airport Access Road
DCR	Dulles Connector Road
DEQ	Department of Environmental Quality
DLPR	Division of Land Protection and Revitalization
DRPT	Department of Rail and Public Transportation
DMS	Dynamic Message Signs
DNH	Department of Natural Heritage
DTR	Dulles Toll Road
EA	Environmental Assessment
EDR	Environmental Data Resources
EIA	Energy Information Administration
EIS	Environmental Impact Statement
EJ	Environmental Justice
EPA	Environmental Protection Agency
ESC	Erosion and Sediment Control

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ETL	Express Toll Lanes
FAA	Federal Aviation Administration
FE	Federally Endangered
FEMA	Federal Emergency Management Agency
FCPA	Fairfax County Park Authority
FDNA	Final Design Noise Analysis
FHWA	Federal Highway Authority
FONSI	Finding of No Significant Impact
FT	Federally Threatened
FY	Fiscal Year
GHG	Greenhouse Gas
GIS	Geographic Information System
GP	General Purpose
GW Parkway	George Washington Memorial Parkway
HGM	Hydrogeomorphic
HHS	Health and Human Services
HOV	High-Occupancy Vehicle
HOV-3	High-Occupancy Vehicle with three or more people
HOT	High-Occupancy Toll
HUC	Hydrologic Unit Code
HUD	Housing and Urban Development
ICE	Indirect and Cumulative Effects
IJR	Interchange Justification Report
IPaC	Information for Planning and Consulting
JPA	Joint Permit Application
LEP	Limited English Proficiency
LOD	Limits of Disturbance
LOS	Level of Service
LRTP	Long Range Transportation Plan
LWCF	Land and Water Conservation Fund
MDOT	Maryland Department of Transportation
MIS	Major Investment Study
MOA	Memorandum of Understanding
MOVES	Motor Vehicle Emission Simulator
MSAT	Mobile Source Air Toxics
MSHA	Maryland State Highway Administration
MTA	Maryland Transit Administration
MWAA	Metropolitan Washington Airports Authority

MWCOG	Metropolitan Washington Council of Governments
NAAQS	National Ambient Air Quality Standards
NAC	Noise Abatement Criteria
NADR	Noise Abatement Design Report
NATA	National Air Toxics Assessment
NCRTPB	National Capital Region Transportation Planning Board
NEPA	National Environmental Policy Act
NEXT	Express Lanes Northern Extension
NHD	National Hydrography Dataset
NHDE	Natural Heritage Data Explorer
NHPA	National Historic Preservation Act
NLEB	Northern Long-Eared Bat
NMFS	National Marine Fisheries Service
NOAA	National Oceanic and Atmospheric Administration
NO <sub>x</sub>	Nitrogen Oxides
NPS	National Park Service
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
OEIR	Office of Environmental Impact Review
OSHA	Occupational Safety and Health Administration
OWJ	Officials with Jurisdiction
PEM	Palustrine Emergent Wetland
PFO	Palustrine Forested Wetland
PIM	Public Information Meetings
PJD	Preliminary Jurisdictional Determination
POW	Palustrine Open-Water Wetland
PPTA	Public-Private Transportation Act
RIBITS	Regulatory In Lieu Fee and Bank Information Tracking System
ROD	Record of Decision
RPA	Resource Protection Area
RPBB	Rusty Patched Bumble Bee
RTE	Rare, Threatened, and Endangered
SE	State Endangered
SERP	State Environmental Review Process
SHA	State Highway Administration
SHPO	State Historic Preservation Officer
SIP	State Implementation Plan
ST	State Threatened



STAG	Stakeholder Technical Advisory Group
TAZ	Transportation Analysis Zone
TIP	Transportation Improvement Program
TNM	Traffic Noise Model
TPB	Transportation Planning Board
USDOT	United States Department of Transportation
USACE	United States Army Corps of Engineers
USFWS	United States Fish and Wildlife Service
VAC	Virginia Administrative Code
VaFWIS	Virginia Fish and Wildlife Information Service
VDACS	Virginia Department of Agriculture and Consumer Services
VDCR	Virginia Department of Conservation and Recreation
VDEQ	Virginia Department of Environmental Quality
VDGIF	Virginia Department of Game and Inland Fisheries
VDHR	Virginia Department of Historic Resources
VDOF	Virginia Department of Forestry
VDOT	Virginia Department of Transportation
VDWR	Virginia Department of Wildlife Resources
VGIN	Virginia Geographic Information Network
VMRC	Virginia Marine Resources Commission
VMT	Vehicle Miles of Travel
VOC	Volatile Organic Compounds
VOF	Virginia Outdoors Foundation
WMATA	Washington Metropolitan Area Transit Authority
WOUS	Waters of the United States



# I-495 Express Lanes Northern Extension Revised Environmental Assessment Appendices

May 2021



**Appendix A: Section 4(f) and 6(f) Technical Memorandum  
(Visualization Booklet Attachment to Section 4(f) & 6(f)  
Technical Memorandum is Included as a Separate Volume)**





REVISED ENVIRONMENTAL ASSESSMENT

# Revised Section 4(f) and Section 6(f) Technical Memorandum

May 2021





## TABLE OF CONTENTS

1.0	INTRODUCTION.....	1
1.1	Project Termini.....	1
1.2	Study Area.....	2
1.3	Limit of Disturbance.....	2
1.4	Purpose and Need.....	2
2.0	Alternatives.....	4
2.1	No Build Alternative.....	4
2.2	Build Alternative.....	4
3.0	Section 4(f) Documentation.....	4
3.1	Section 4(f) Properties.....	5
3.2	Section 4(f) Properties Used.....	9
3.2.1	George Washington Memorial Parkway.....	9
3.2.2	Scott’s Run Nature Preserve.....	13
3.3	Section 4(f) De Minimis Impact.....	17
3.4	Temporary Occupancy.....	17
3.5	Section 4(f) applicability TO Trail and Bike Facilities.....	18
3.6	impacts to Section 4(f) properties.....	19
3.6.1	George Washington Memorial Parkway.....	19
3.6.2	Scott’s Run Nature Preserve.....	30
4.0	Section 6(f).....	40
4.1	Section 6(f) Resources.....	40
4.1.1	Section 6(f) Impacts.....	40
4.1.2	Coordination.....	41
5.0	References.....	43

## LIST OF FIGURES

Figure 1-1.	I-495 Express Lanes Northern Extension Project Limits.....	3
Figure 3-1.	Identified Section 4(f)/6(f) Resources.....	8
Figure 3-2.	George Washington Memorial Parkway- National Park Service Map.....	11
Figure 3-3.	George Washington Memorial Parkway within the Study Area and LOD.....	12
Figure 3-4.	Scott’s Run Nature Preserve within the Study Area and LOD.....	14
Figure 3-5.	Scott’s Run Nature Preserve Trail Map- Fairfax County Trail Buddy Website.....	15



Figure 3-6. Existing Virginia Electric Power Company (now Dominion Energy) Easement within the Scott’s Run Nature Preserve.....16

Figure 3-7. Section 4(f) Impacts Related to the George Washington Memorial Parkway.....28

Figure 3-8. 1967 Aerial Photography (Period of Significance) - Option 1 from the February 2020 Visualization Booklet.....29

Figure 3-9. Section 4(f) Impacts Related to Scott’s Run Nature Preserve.....36

Figure 3-10. Proposed Shared Use Path.....37

Figure 3-11. Scott’s Run Nature Preserve - Proposed Replacement Land.....38

Figure 3-12. Scott's Run Nature Preserve- Replacement Land - Potential FCPA Parking Lot Layout Sketch .....39

Figure 4-1. Section 6(f) Impacts Related to Scott’s Run Nature Preserve.....42

**LIST OF TABLES**

Table 3-1. Identified Section 4(f) Properties Within the Study Area..... 7

Table 3-2. Impacts to the George Washington Memorial Parkway.....25

Table 3-3. Impacts to the Scott’s Run Nature Preserve.....33

Table 4-1. Section 6(f) Impacts to the Scott’s Run Nature Preserve.....41

**LIST OF APPENDICES**

Appendix A: George Washington Memorial Parkway Visualizations Booklet (February 6, 2020)

*(Attached by reference as a separate volume)*

Appendix B: Coordination

## **1.0 INTRODUCTION**

The Virginia Department of Transportation (VDOT), in coordination with the Federal Highway Administration (FHWA) as the lead federal agency, is evaluating an extension of the Interstate 495 (I-495) Express Lanes along approximately three miles of I-495, also referred to as the Capital Beltway, from their current northern terminus in the vicinity of the Old Dominion Drive overpass to the George Washington Memorial Parkway (GW Parkway) in the McLean area of Fairfax County, Virginia. Pursuant to the National Environmental Policy Act (NEPA) of 1969, as amended, and in accordance with FHWA regulations<sup>1</sup>, a Revised Environmental Assessment (EA) is being prepared to analyze the potential social, economic, and environmental effects associated with the improvements being evaluated.

The purpose of this *I-495 Revised Section 4(f) and Section 6(f) Technical Memorandum* is to identify Section 4(f) and Section 6(f) properties within the study area and to evaluate potential impacts that could result from implementation of the Build Alternative. Information in this report provides an overview of the regulatory context, methods used to identify existing resources, potentially affected resources identified within the study area, and potential impacts to Section 4(f) and Section 6(f) properties associated with the implementation of the Build Alternative. The findings of this technical report support discussions presented in the EA.

### **1.1 PROJECT TERMINI**

The project includes an extension of the existing Express Lanes from their current northern terminus south of the Old Dominion Drive Overpass to the GW Parkway. Although the GW Parkway provides a logical northern terminus for this study, additional improvements are anticipated to extend approximately 0.3 miles north of the GW Parkway to provide a tie-in to the existing road network in the vicinity of the American Legion Memorial Bridge (ALMB). The project also includes access ramp improvements and lane reconfigurations along portions of the Dulles Toll Road and the Dulles International Airport Access Highway, on either side of the Capital Beltway, from the Spring Hill Road Interchange to the Route 123 interchange. The proposed improvements entail new and reconfigured Express Lanes ramps and general purpose lanes ramps at the Dulles Interchange and Route 123/I-495 interchange ramp connections.

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<sup>1</sup> NEPA and FHWA's regulations for Environmental Impact and Related Procedures can be found at 42 USC § 4332(c), as amended, and 23 CFR § 771, respectively.

## **1.2 STUDY AREA**

In order to assess and document relevant resources that may be affected by the proposed project, the study area for this EA extends beyond the immediate area of the proposed improvements described above. The study area for the EA includes approximately four miles along I-495 between the Route 123 interchange and the ALMB up to the Maryland state line. The study area also extends approximately 2,500 feet east along the GW Parkway. Intersecting roadways and interchanges are also included in the study area, as well as adjacent areas within 600 feet of the existing edge of pavement, as shown in **Figure 1-1**. The study area boundary is a buffer around the road corridor that includes all natural, cultural, and physical resources that must be analyzed in the EA. It does not represent the limits of disturbance (LOD) of the project nor imply right-of-way take or construction impact, but rather extends beyond the project footprint to tie into the surrounding network, including tying into future network improvements.

## **1.3 LIMIT OF DISTURBANCE**

Potential impacts to natural resources described in the following sections of this technical report have been calculated using a conceptual level design of the Build Alternative. The footprint for this conceptual level of design is referred to as the LOD. The LOD accommodates roadway improvements, drainage, stormwater management facilities, utilities, erosion and sediment control, noise control measures, construction methods, and special use permits.

Impact values presented for the evaluated resources represent the worst-case scenarios and assume complete direct impact to the resource occurring in the LOD. As design progresses, measures may be taken to avoid and minimize impacts to environmental resources to the maximum extent practicable. Recommendations for potential minimization and mitigation measures for unavoidable adverse impacts are provided under the Build Alternative sections of each resource that is discussed in this report. At this time, it is not possible to anticipate the exact locations of each proposed activity; impacts outside of the existing study area would be reviewed and documented through future NEPA re-evaluations.

## **1.4 PURPOSE AND NEED**

The purpose and need for the extension of Express Lanes on I-495 between Route 267 and the GW Parkway is to:

- Reduce congestion;
- Provide additional travel choices; and
- Improve travel reliability.

A detailed description of the purpose and need for the proposed project can be found in Chapter 1.0 of the EA.

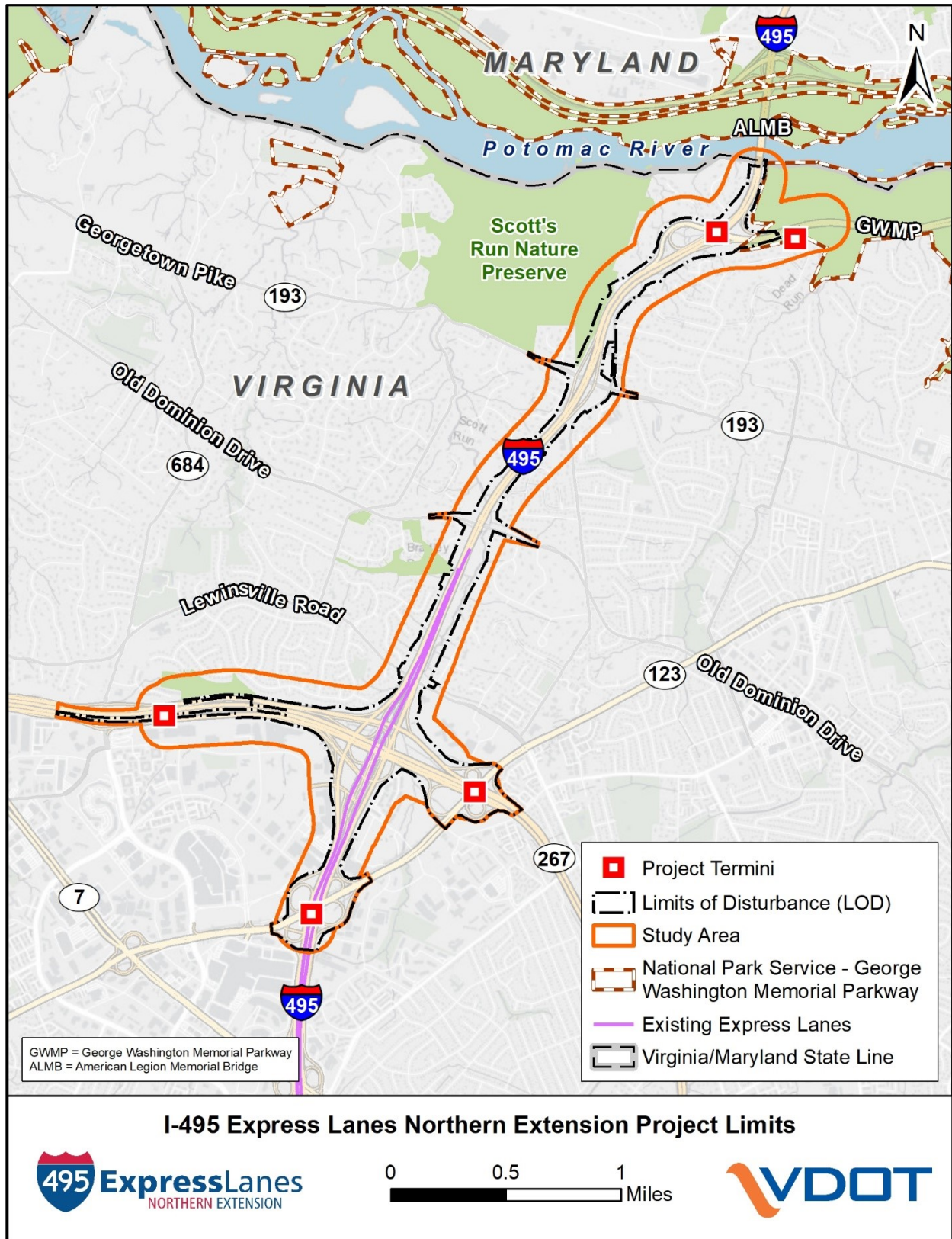


Figure 1-1. I-495 Express Lanes Northern Extension Project Limits



## 2.0 ALTERNATIVES

Two alternatives are being considered in the EA: the No Build Alternative and the Build Alternative, described below. Additional information on the Build Alternative is included in the *I-495 Alternatives Development Technical Memorandum* (VDOT, 2020a).

### 2.1 NO BUILD ALTERNATIVE

Under the No Build Alternative, the Express Lanes would not be extended beyond the current northern terminus at Old Dominion Drive. There would be no change to existing access points, and I-495 would remain in its present configuration. VDOT would continue maintenance and repairs of the existing roadway, as needed, with no substantial changes to current capacity or management activities.

### 2.2 BUILD ALTERNATIVE

The Build Alternative would extend the existing four I-495 Express Lanes from their current terminus between the I-495/Route 267 interchange and the Old Dominion Drive Overpass north approximately 2.3 miles to the GW Parkway.

Additional improvements are anticipated to extend approximately 0.3 miles north of the GW Parkway to tie into the existing road network in the vicinity of the ALMB. The Build Alternative would retain the existing number of general purpose (GP) lanes within the study area.

Direct access ramps would be provided from the I-495 Express Lanes to the Dulles Toll Road and the GW Parkway. Access would also be provided between the I-495 GP and Express Lanes at the Route 267 interchange: from northbound GP lanes to northbound Express Lanes, and from southbound Express Lanes to southbound GP lanes, located within the current interchange footprint. These connections have been accounted for in the LOD and are described in more detail in *I-495 Alternatives Development Technical Memorandum* (VDOT, 2020a) and the *I-495 Traffic and Transportation Technical Report* (VDOT, 2020b).

The Build Alternative includes an approximately 3.1-mile 10-foot-wide shared use path, consistent with the Fairfax County Countywide Trails Plan Map (FCDPZ, 2018), that is not provided under the existing condition.

## 3.0 SECTION 4(F) DOCUMENTATION

Under provisions of Section 4(f) of the US Department of Transportation Act of 1966 (49 USC § 303(c)), FHWA may approve the use of land from publicly owned public parks or recreation areas, publicly owned wildlife or waterfowl refuges, or historic properties that are listed on, or eligible for listing on, the National Register of Historic Places (NRHP) for federal-aid highway projects if it determines that there is no feasible and prudent avoidance alternative and the action includes all possible planning to minimize harm to the property.

FHWA also may approve the use of land from such properties if it determines that the use of the property, including any measure(s) to minimize harm (such as any avoidance, minimization, mitigation, or enhancement measures) committed to by the applicant, will have a *de minimis* impact, as defined in 23 CFR § 774.17, on the property.

A “use” of Section 4(f) property occurs: (1) When land is permanently incorporated into a transportation facility, (2) When there is a temporary occupancy of land that is adverse in terms of the statute's preservation purpose, or (3) When there is a constructive use of a Section 4(f) property.

### **3.1 SECTION 4(F) PROPERTIES**

Eight Section 4(f) properties, listed on **Table 3-1** and shown in **Figure 3-1**, have been identified in the study area associated with the I-495 NEXT project. Two of the Section 4(f) properties, the GW Parkway and Scott’s Run Nature Preserve, are anticipated to be impacted by the Build Alternative. These properties, as well as the six remaining Section 4(f) properties that would not be impacted by the I-495 NEXT project, are summarized in the text below.

- **George Washington Memorial Parkway**—The GW Parkway and its associated parks and trails are owned by the United States and administered by the National Park Service (NPS) and total approximately 7,600 acres in size. The GW Parkway was originally set aside by Congress as a “comprehensive park, parkway, and playground system of the National Capital” (NPS, 2019). The GW Parkway was listed on the NRHP in June 1995 under the Multiple Property documentation “Parkways of the National Capital Region, 1913 to 1965.” The Parkway is noteworthy for its example of parkway construction and early 1950’s and 1960’s engineering and transportation innovations, landscape architecture, dramatic drive characterized by gentle curves and rolling forested hills and bluffs, views to the Potomac River Gorge, rustic stone masonry guardwalls, and historical and commemorative associations with George Washington. The GW Parkway was designed to lie lightly on the land, with the utmost care given to the preservation of the Potomac Palisades, the Potomac River Gorge, and various runs and ravines that drain into the Potomac River. Approximately, 60 acres of the GW Parkway are within the study area and approximately 4.8 acres are within the LOD; therefore, Section 4(f) applies to impacts within the GW Parkway property.

The Potomac Gorge can also be found within the boundaries of the GW Parkway. The entire Potomac Gorge is a 15-mile river shoreline of public parkland that is documented as one the mid-Atlantic’s most biologically diverse areas with over 1,400 plant species identified and at least 30 distinct vegetation communities. The Potomac Gorge is also known for its unique geology as rainwater from an 11,500 square mile area upstream is funneled through a constricted passageway, where plants have adapted the ability to survive in the face of intense flood scouring (The Nature Conservancy, 2005). The Potomac Gorge has been identified as a Section 4(f) resource as part of the GW Parkway, but the project improvements have been designed to avoid impacts to or use of the Potomac Gorge.

In addition, the GW Parkway is designated as an “All-American Road.” According to the FHWA, an “All-American Road” means that the road possesses multiple intrinsic qualities that are nationally significant and have one-of-a-kind features that do not exist elsewhere. FHWA also states that the road or highway must also be considered a “destination unto itself.” That is, the road must provide an exceptional traveling experience so recognized by travelers that they would make a drive along the highway a primary reason for their trip.

- **Scott’s Run Nature Preserve**—Scott’s Run Nature Preserve is a 336-acre preserve located in McLean, north of Georgetown Pike and west of the I-495 corridor. The Scott’s Run Nature Preserve is operated by the Fairfax County Park Authority (FCPA) and is a publicly owned and publicly

accessible recreational area. Approximately 25 acres of the Scott's Run Nature Preserve fall within the study area and approximately 4.11 acres are within the LOD; therefore, Section 4(f) applies to impacts within the Scott's Run Nature Preserve.

- **Georgetown Pike / Route 193**—A portion of the Georgetown Pike (Route 193) roadbed is listed on the NRHP. Approximately 10 acres of the entire Georgetown Pike corridor is within the study area and the LOD, but this section is not within the boundaries of the NRHP nomination and therefore consideration under Section 4(f) is not necessary.
- **McLean Hamlet Park**—McLean Hamlet Park is an 18-acre neighborhood park that is owned and maintained by the FCPA. Approximately, 16 acres of McLean Hamlet Park property are located within the study area; however, none of the McLean Hamlet Park property falls within the LOD and therefore consideration under Section 4(f) is not necessary.
- **Potomac Heritage National Scenic Trail**—The Potomac Heritage National Scenic Trail (Potomac Heritage Trail) is an approximately 830-mile network of locally managed trails on both sides of the Potomac River between its mouth at the Chesapeake Bay and the Allegheny Highlands in the upper Ohio River Basin. The evolving Potomac Heritage Trail network is managed by various governmental agencies and nonprofit organizations. This trail network's primary purpose is non-motorized recreation. Approximately 6,372 linear feet of the Potomac Heritage Trail are within the study area and 5,030 feet of the Potomac Heritage Trail fall within the LOD. It is within the boundary of the NRHP-listed GW Parkway but is not independently listed on the NRHP. The Potomac Heritage Trail has been identified as a Section 4(f) resource, but the I-495 NEXT project has been designed to avoid impacts to or use of the resource. Therefore, consideration under Section 4(f) is not necessary for the trail.
- **Scotts Run Trail\***—The FCPA has acquired an easement within The Preserve at Scotts Run Homeowners Association parcel (Located between Old Dominion Drive and Lewinsville Road) for the future "Scotts Run Trail" as identified on Fairfax County's Trail Buddy website (Fairfax County, 2020b). Approximately 3,061 linear feet of the trail are within the study area, and approximately 1,568 linear feet are within the LOD. The Scotts Run Trail has been identified as a Section 4(f) resource, but the I-495 NEXT project has been designed to avoid impacts to the resource.
- **Timberly Park**—Timberly Park, owned and maintained by FCPA, is a 23-acre community park located in McLean, west of I-495 and south of Old Dominion Drive. Approximately, 4.5 acres of Timberly Park property are located within the study area; however, none of the Timberly Park property falls within the LOD and therefore consideration under Section 4(f) is not necessary.
- **Dead Run Ridges Archaeological District**—The Dead Run Ridges Archaeological District (Site 44FX3922) is located within GW Parkway property. In September 2020, NPS concurred with the Maryland State Highway Administration that the Dead Run Ridges Archaeological District is eligible for the NRHP. Although the LOD and study area for the I-495 NEXT project extends within

*\*Please note that the Scotts Run Trail falls within the boundary a privately owned conservation easement. Approximately 7.69 acres of the conservation easement is within the study area with 7.56 of those acres encompassed within the LOD. Due to the conservation easement being privately owned, it is not subject to Section 4(f).*

the boundaries of the Dead Run Ridges Archaeological District, none of the archaeological resources that contribute to the NRHP eligibility of the district would be impacted by the project. Please note that due to the sensitivity of this resource, the location is not shown on **Figure 3-1**.

**Table 3-1. Identified Section 4(f) Properties Within the Study Area**

Identified Section 4(f) Properties within the Study Area	Official with Jurisdiction	Type of Facility	Section 4(f) Use
George Washington Memorial Parkway <sup>1</sup>	National Park Service and Virginia Department of Historic Resources	Historic Property-NRHP Listed Recreation Area-Scenic Recreational Driving, Parks, Athletic Fields, Wildlife Viewing, Scenic Views of the Potomac River, Potomac Gorge and the Potomac Palisades	Yes
Potomac Heritage National Scenic Trail	Various Government and Non-Profit Organizations	Trail	No
Scott's Run Nature Preserve	Fairfax County Park Authority	Regional Park	Yes
Scotts Run Trail	Fairfax County Park Authority	Trail	No
Georgetown Pike / Route 193	Virginia Department of Historic Resources	Historic Property-NRHP Listed	No
McLean Hamlet Park	Fairfax County Park Authority	Local Park	No
Timberly Park	Fairfax County Park Authority	Local Park	No
Dead Run Ridges Archaeological District	National Park Service and Virginia Department of Historic Resources	Historic Property-NRHP Eligible	No

NRHP = National Register of Historic Places

<sup>1</sup> Also an All-American Road

Source: Fairfax County Property Map, 2018; VDHR V-CRIS GIS Data, 2018



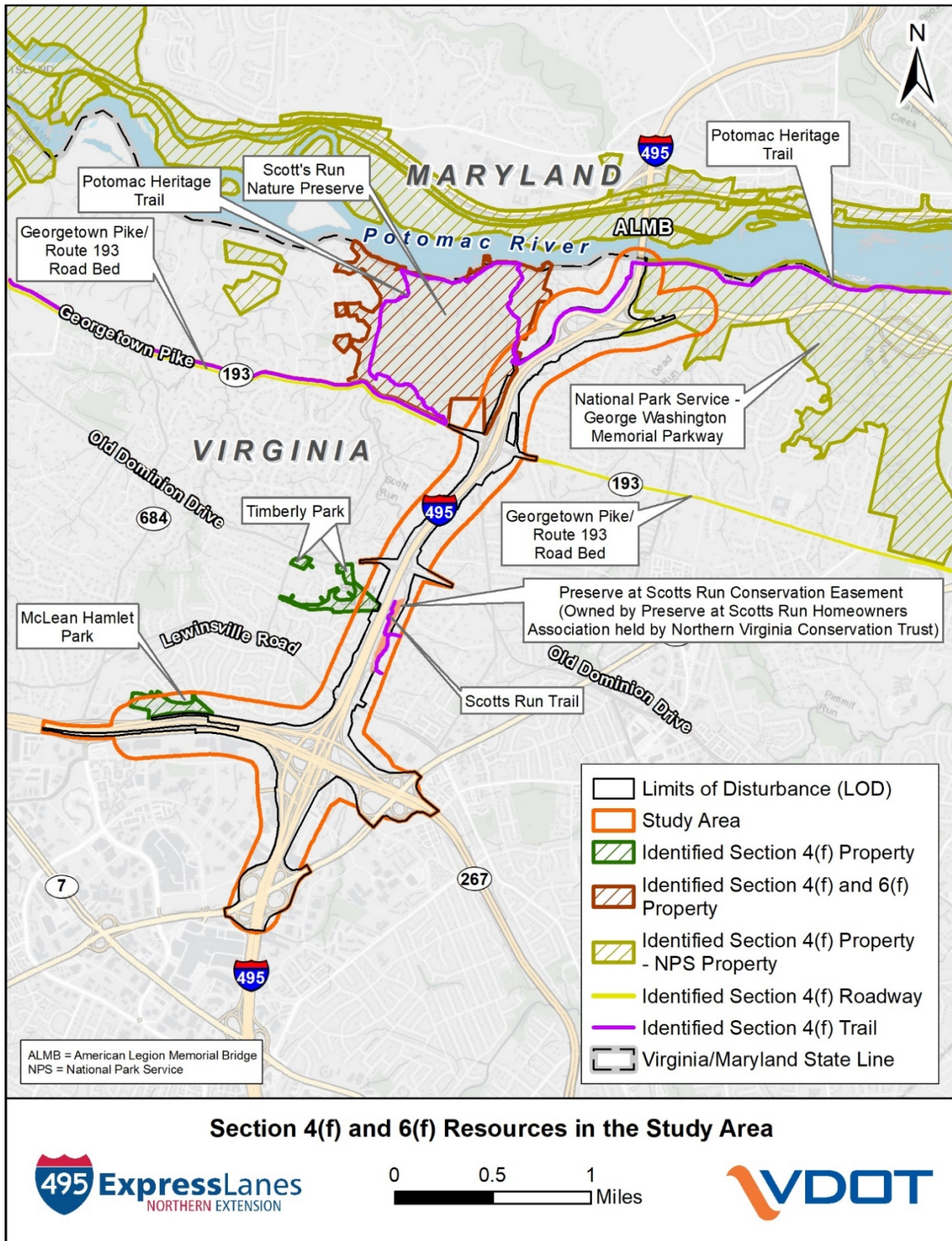


Figure 3-1. Identified Section 4(f)/6(f) Resources

## 3.2 SECTION 4(F) PROPERTIES USED

Two Section 4(f) properties, the GW Parkway and the Scott's Run Nature Preserve, are anticipated to be used by the I-495 NEXT project. The text below describes each of these resources.

### 3.2.1 George Washington Memorial Parkway

**Description of the Section 4(f) property**—For a detailed description of the GW Parkway and its associated features, please see Section 3.1 of this technical memorandum. Approximately 4.8 acres of the GW Parkway fall within the project's LOD. **Figure 3-2** provides a map of GW Parkway in its entirety and **Figure 3-3** shows the location of the GW Parkway as it relates to the I-495 NEXT project's study area and associated LOD.

**Features and functions**—The GW Parkway is used for scenic recreational driving from the border of Virginia and Maryland at the ALMB into Washington D.C. with stops to visit historical, natural, and recreational areas (National Park Foundation, 2019). The Park has more than 25 sites associated with George Washington's life, and provides views of the Potomac River, the Potomac River Gorge and the Potomac Palisades. The GW Parkway was designed to lie lightly on the land, with the utmost care given to preservation of the Potomac Palisades, the Potomac River Gorge, and various runs and ravines that drain into the Potomac River. The GW Parkway provides a dramatic drive characterized by gentle curves, rolling forested hills, bluffs, and rustic stone masonry guardwalls. The Parkway has trails for hiking and biking (including the Potomac Heritage Trail and the Mount Vernon Trail); the parkway also includes several parks (Fort Hunt Park, Jones Point Park, Gravelly Point, Turkey Run Park, and Lady Bird Johnson Park), softball diamonds, basketball courts and grass fields; and the Dyke Marsh Wildlife Preserve that is used for canoeing, kayaking, and wildlife viewing (NPS, 2019).

**Access**—The GW Parkway is approximately 24.9 miles long with access to the GW Parkway made available from I-495 to the north and from Route 235 to the south. The GW Parkway is generally open to the public year-round, 24 hours a day. Within the I-495 NEXT project's study area, approximately 9.7 miles of the GW Parkway runs from the ALMB to the existing I-495 (Capital Beltway). Most recreational facilities are open from 6 AM to 10 PM. All of the recreational areas within the GW Parkway are accessible by foot, car, and in some cases public transportation.

**Relationship to other similarly used land in the vicinity**—The GW Parkway is unique compared to other parks in the vicinity due to its size and opportunity for recreational activities while also providing extensive habitat for local wildlife. There are other parks in the immediate study area, owned by the FCPA, which are also open to the public and have some similar features including sports fields and trails, but do not front the Potomac River to the same extent. The GW Parkway is similar to Scott's Run Nature Preserve, Clara Barton Parkway, Great Falls Park, and River Bend Park, as they all have trails through similar landscapes along the Potomac River and habitat for rare plants and animals.

**Ownership and type of Section 4(f) property**—The GW Parkway and its associated recreational facilities are owned by the United States and administered by the NPS. The GW Parkway is listed on the NRHP and provides users with the opportunity for scenic recreational driving; therefore, the GW Parkway is considered a Section 4(f) resource as both a historic property and recreational area.

***Clauses affecting ownership***—Land within the GW Parkway is solely owned by the United States and administered by the NPS.

***Unusual characteristics***—The GW Parkway commemorates the first president, preserves the natural setting, and provides a scenic entryway for visitors to the nation’s capital (GW Parkway NRHP Nomination, 1995). Areas within the GW Parkway also provide recreational opportunities in the form hiking, biking, scenic recreational driving, parks, athletic fields, wildlife viewing and scenic views of the Potomac River, Potomac Gorge, and the Potomac Palisades.







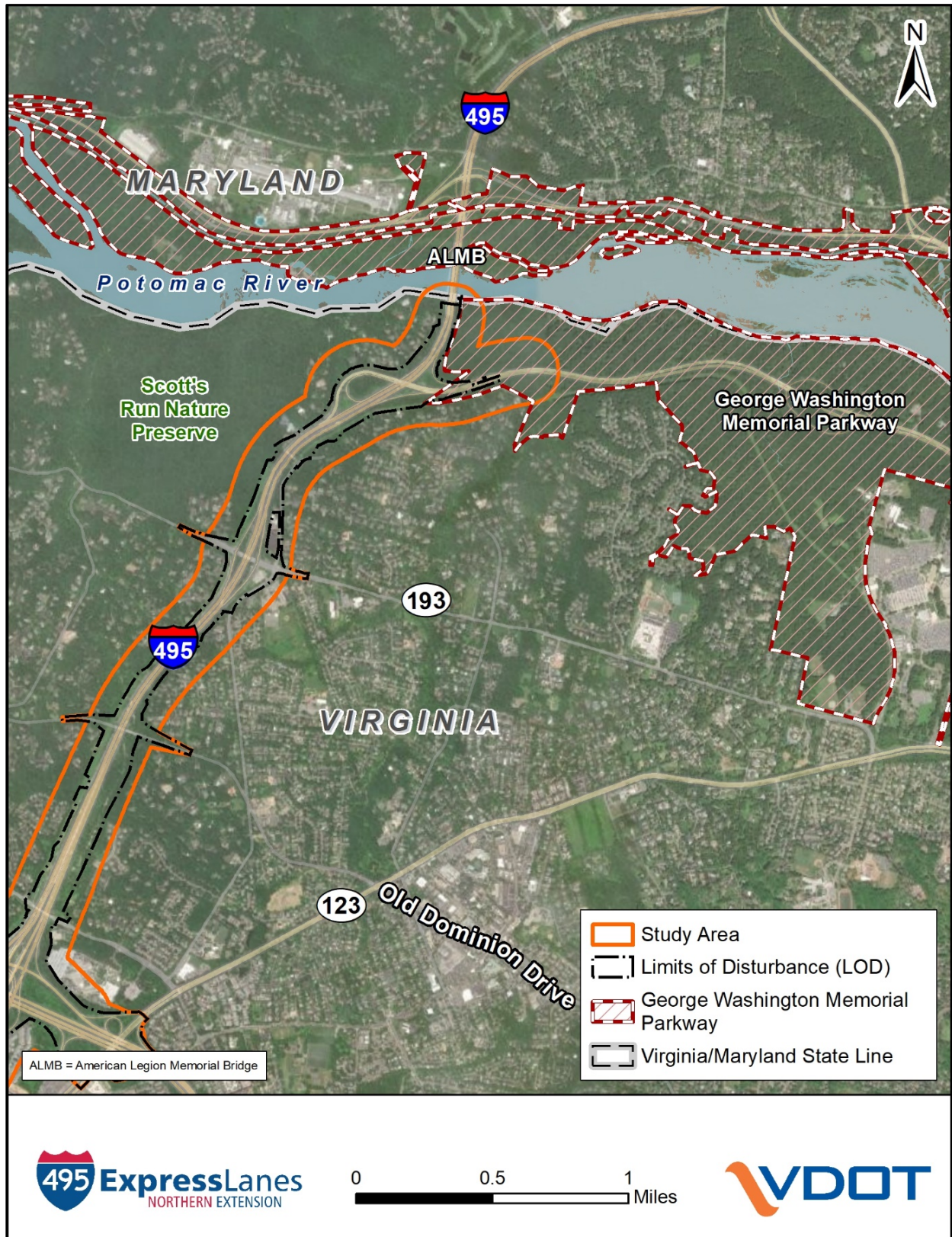


Figure 3-3. George Washington Memorial Parkway within the Study Area and LOD

### 3.2.2 Scott's Run Nature Preserve

**Description of the Section 4(f) property**—The Scott's Run Nature Preserve is an approximately 336-acre preserve located in McLean, north of Georgetown Pike and west of the I-495 corridor. Approximately 4.11 acres of the Scott's Run Nature Preserve fall within the project's LOD (see **Figure 3-4**).

**Features and functions**—The Scott's Run Nature Preserve is predominantly made up of natural woods, bluffs, and hiking trails. The recreational activities within the Scott's Run Nature Preserve include walking, hiking, bird watching, wildlife viewing, educational programming, and other similar activities (see **Figure 3-5**). Scotts Run stream flows from near Tysons Corner Shopping Center, through the adjacent Scotts Run Stream Valley Park, through the Preserve itself, over a small waterfall – Scott's Run Falls – and into the Potomac River. The Potomac Gorge is also a part of Scott's Run Nature Preserve, which features diverse landscapes, rare plants and animals, and one of the rarest biological ecosystems in the mid-Atlantic. The only building facilities that exist within the Scott's Run Nature Preserve are informational signs at the entrance and occasionally along the trails.

**Access**—Public access to the Scott's Run Nature Preserve is provided from I-495 via Georgetown Pike. Both entrances feature small parking lots that lead to trailheads within the Scott's Run Nature Preserve. One entrance sits alongside a stream, and the other entrance has trails leading to the bluffs above the Potomac River (Fairfax County, 2020a). The Scott's Run Nature Preserve is open to the public from one-half hour before sunrise until one-half hour after sunset, seven days a week.

**Relationship to other similarly used land in the vicinity**—In comparison to other parks in the vicinity, Scott's Run Nature Preserve is most similar to the GW Parkway, as they both feature trails and opportunities to experience similar landscapes and wildlife habitat.

**Ownership and type of Section 4(f) property**—The Scott's Run Nature Preserve is operated by the FCPA and is a publicly owned and publicly accessible recreational area; therefore, it is considered to be a Section 4(f) property. In addition, the Scott's Run Nature Preserve as noted in Fairfax County land records was acquired with Land and Water Conservation Funds; therefore, Section 6(f) also applies (see Section 4.0). Virginia Electric Power Company (now Dominion Energy) holds an easement along the portion of the Scott's Run Nature Preserve that abuts existing I-495 (see **Figure 3-6**).

**Clauses affecting ownership**—Land within Scott's Run Nature Preserve is owned by the FCPA with an existing easement held by Virginia Electric Power Company (now Dominion Energy) for the portion of the Scott's Run Nature Preserve that abuts existing I-495. No other entities own property within the Scott's Run Nature Preserve.

**Unusual characteristics**—As stated previously, the Scott's Run Nature Preserve is similar to the GW Parkway because it offers similar landscapes and wildlife habitat. It is different from other parks nearby, and from other parks in the county that are owned by FCPA, due to its lack of facilities such as sports fields, a visitors' center, or restrooms.





Figure 3-4. Scott's Run Nature Preserve within the Study Area and LOD



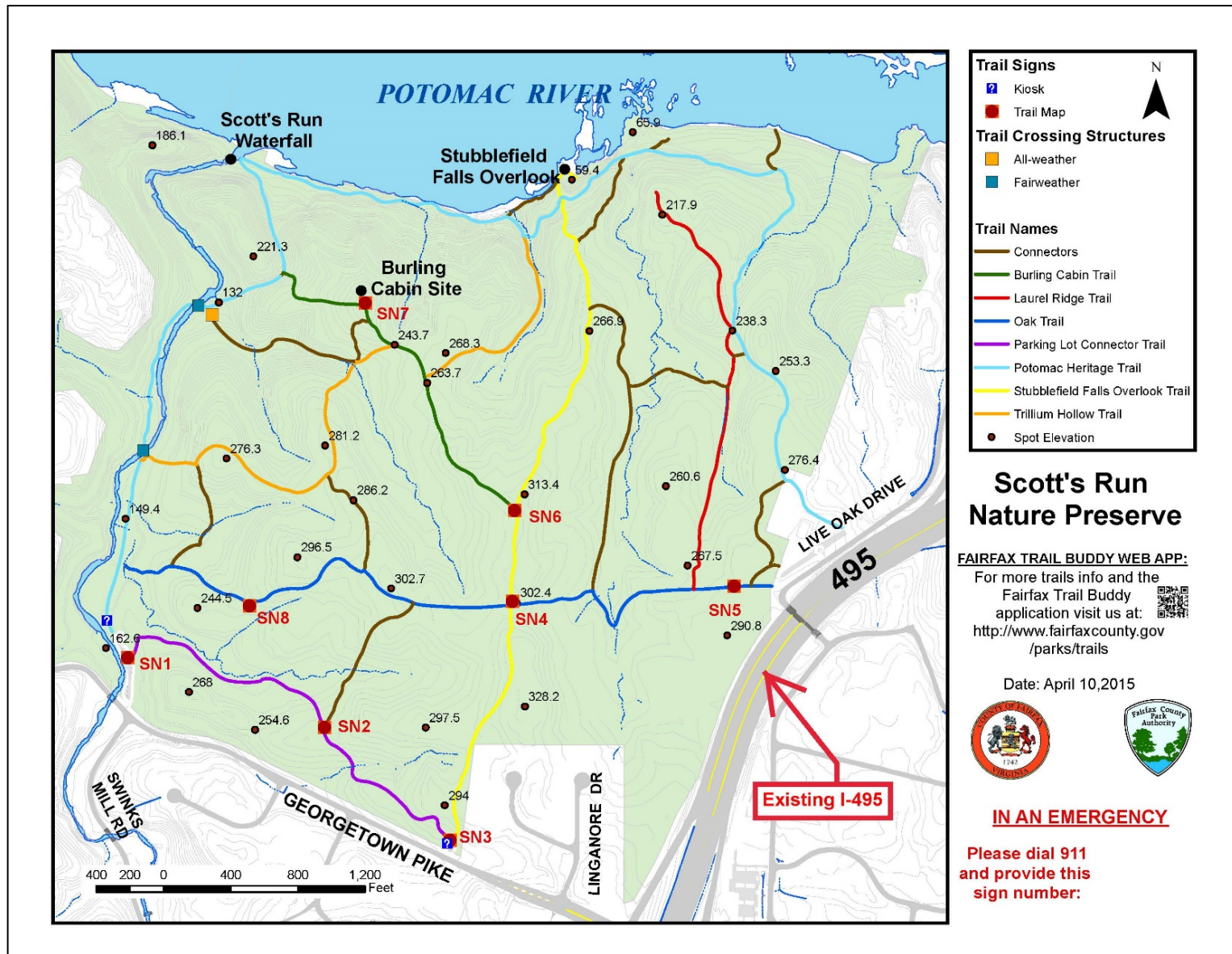


Figure 3-5. Scott's Run Nature Preserve Trail Map- Fairfax County Trail Buddy Website





Figure 3-6. Existing Virginia Electric Power Company (now Dominion Energy) Easement within the Scott's Run Nature Preserve



### 3.3 SECTION 4(F) DE MINIMIS IMPACT

The Build Alternative would require the use of land from both the GW Parkway and the Scott's Run Nature Preserve, and for both, the Section 4(f) impacts are anticipated to be considered *de minimis* under 23 CFR 774.17 or, in the case of temporary impacts, qualify as a Section 4(f) exception (23 CFR 774.13) (see Section 3.4). Because the impacts are considered *de minimis* or temporary in nature, avoidance alternatives or analysis of least overall harm are not anticipated to be required.

A *de minimis* impact is one that will not adversely affect the features, attributes, or activities qualifying the property upon which the impact occurs for protection under Section 4(f) (23 CFR 774.17).

Before FHWA can make a *de minimis* impact determination for parks, recreation areas and refuges such as the GW Parkway and the Scott's Run Nature Preserve, the following coordination must be undertaken:

- Public notice and an opportunity for public review and comment concerning the effects on the protected activities, features, or attributes of the property must be provided.
- The Official(s) with Jurisdiction (OWJ) over the properties must be informed of FHWA's intent to make a *de minimis* impact determination. The OWJ for Scott's Run Nature Preserve is the FCPA. Because the GW Parkway is both a recreational and historic Section 4(f) property, both the NPS and the State Historic Preservation Office (SHPO), which falls under the Virginia Department of Historic Resources, or VDHR) serve as OWJs for this resource.
- Following the opportunity for public review and comment as indicated above, the OWJs over the properties must concur in writing that the project will not adversely affect the activities, features, or attributes that make the property eligible for Section 4(f) protection. This concurrence may be combined with other comments on the project provided by the official(s).

FHWA can only make *de minimis* impact determination for a historic property like the GW Parkway, if the following conditions are met:

- Written concurrence on a Section 106 finding of "No Adverse Effect" or "No Historic Properties Affected" must be received from the SHPO.
- The SHPO must be informed of FHWA's intent to make a *de minimis* impact determination based on their concurrence in the finding of "no adverse effect" or "No Historic Properties Affected."
- The Section 106 consulting parties must be consulted.

The FCPA (as related to the Scott's Run Nature Preserve) and the NPS and SHPO (as related to the GW Parkway) have been notified of FHWA's intention to make a *de minimis* impact determination with respect to the Build Alternative's use of land from both the GW Parkway and the Scott's Run Nature Preserve. NPS and FCPA provided their concurrence with the *de minimis* impact determination on May 6, 2021 and May 17, 2021 respectively (see **Appendix B**).

### 3.4 TEMPORARY OCCUPANCY

A temporary occupancy of a Section 4(f) property is not considered a Section 4(f) use if the occupancy meets the following conditions (23 CFR 774.13):

- The duration of the occupancy is less than the time needed for construction of the project and there would be no change in ownership.
- The scope of the work is minor, i.e., both the nature and magnitude of the changes to the property are minimal.
- There are no anticipated permanent adverse physical impacts, and there is no interference with the protected activities, features, or attributes of the property on either a temporary or permanent basis.
- The land is fully restored, i.e., the property is returned to a condition which is at least as good as that which existed prior to the project.

There must be documented agreement of the OWJ over the Section 4(f) property regarding the above conditions. Based on the preliminary design, the temporary occupancies of the Scott's Run Nature Preserve and the GW Parkway are anticipated to meet these conditions.

### **3.5 SECTION 4(F) APPLICABILITY TO TRAIL AND BIKE FACILITIES**

Section 4(f) does not apply to trails, paths, bikeways, and sidewalks (see 23 CFR 774.13(f)(3)(4)) that occupy a transportation right-of-way without limitation to any specific location within the right-of-way, so long as the continuity of the trail, path, bikeway, or sidewalk is maintained, and these facilities are part of the local transportation system which function primarily for transportation.

The following existing trails, paths, bikeways, and sidewalks were identified within the study area:

- Live Oak Trail and Sidewalk – approximately 495 feet within LOD
- Balls Hill Road – approximately 1,820 feet within LOD
- Georgetown Pike – approximately 1,115 feet within LOD
- Lewinsville Road – approximately 730 feet within LOD
- Westpark Drive – approximately 540 feet within LOD
- Old Dominion Drive – approximately 410 feet within the LOD
- Timberly Lane – approximately 30 feet within the LOD
- Spring Hill Road – approximately 85 feet within the LOD
- Anderson Road – approximately 50 feet within the LOD

The following proposed trails, paths, bikeways, and sidewalks were identified within the study area:

- Benjamin Street – approximately 60 feet within LOD
- Jones Branch Drive Bridge – approximately 1,110 feet within the LOD
- Pedestrian Bridge over Route 267 – approximately 315 feet within the LOD
- Beltway and Tysons Old Meadow – approximately 3,100 feet within the LOD
- Old Dominion Drive – approximately 975 feet within the LOD
- Georgetown Pike – approximately 870 feet within the LOD
- Dolley Madison Boulevard – approximately 2,000 feet within the LOD
- Connection to Maryland Trail – 3,900 feet within the LOD

As the portions of these facilities are within the study area and are located within the transportation right-of-way, as there is no known easement (or other instrument) requiring the facilities to be in their



specific location and the existing continuity and use of the trails will be maintained in all proposed actions, the aforementioned provision is applicable with respect to the permanent impact of the proposed action.

Additionally, as these facilities would remain open and operational during construction, the aforementioned exception is also applicable to any temporary (construction) impacts related to the proposed action. VDOT typically maintains safe pedestrian access where it currently exists on roadway projects, and project-specific maintenance of traffic plans would be developed accordingly.

### **3.6 IMPACTS TO SECTION 4(F) PROPERTIES**

#### **3.6.1 George Washington Memorial Parkway**

##### ***Coordination***

The VDOT project team worked closely with the NPS and the SHPO to develop a project that considers the setting and feeling of the GW Parkway. The goal behind the I-495 NEXT project's design is to minimize the visual and physical impacts to the GW Parkway, while incorporating elements of design that creates a gateway entrance to the GW Parkway off I-495. With this in mind, numerous coordination meetings and letters between VDOT, NPS and the SHPO have occurred. The results of these coordination efforts are outlined below:

- 06/25/2018—VDOT sent scoping letters sent to both the SHPO and the NPS.
- 03/17/2019—VDOT sent a letter to the SHPO to coordinate the effect determination for cultural resources that fall within the project's Area of Potential Effect (APE).
- 03/28/2019—The SHPO concurred with the definition of the APE.
- 04/4/2019—Meeting held between VDOT and NPS to introduce the project's initial conceptual design to the NPS.
- 06/24/2019—Meeting held between VDOT and NPS. VDOT presented the traffic sensitivity analysis for the GW Parkway interchange ramps.
- 08/21/2019—Meeting held between VDOT, SHPO, and NPS. VDOT presented potential preliminary signing options for the proposed GW Parkway guide signs and Express Lanes toll pricing signs.
- 10/16/2019—Meeting held between VDOT and the SHPO to provide the SHPO with a status update on the on-going coordination efforts with the NPS.
- 10/21/2019—Meeting held between VDOT and NPS. VDOT presented minimization and mitigation options related to the proposed signage and footprint impacts, by: (1) relocating and consolidating signs with existing and future signage associated with Maryland's project; (2) optimizing alignment and proposed grading elements. VDOT committed to prepare visualizations for NPS review and comment depicting options to reduce the project's footprint and impacts to NPS land.
- 12/12/2019—Meeting held between VDOT and NPS. VDOT presented a revised signage plan and visualizations of three options, which included illustrations of different impacts to tree canopy

where the I-495 NEXT project ties into the GW Parkway. NPS requested additional visualizations of these options.

- 01/23/2020—Meeting held between VDOT and NPS. VDOT presented visualizations for the three design concepts that were presented on December 12, 2019. NPS requested two additional visualizations. NPS also requested that a tree survey be conducted where currently I-495 currently ties into the existing eastbound GW Parkway lanes.
- 02/06/2020—Meeting held between VDOT, SHPO and NPS. The VDOT project team presented a package of signage plans and visualizations, including a fourth option that partially removes vegetation on NPS property to accommodate a wall that is smaller in scale than what is included in previous options. This information was summarized in the *George Washington Memorial Parkway Visualization Booklet* (henceforth referenced as the *February 2020 Visualization Booklet*) (see Appendix A). The *February 2020 Visualization Booklet* addressed the NPS’s desire for a clear gateway to the GW Parkway, proposed directional signage to I-495 from the GW Parkway, and the merging of the Express Lanes and GP lanes from I-495 from the south onto the GW Parkway. VDOT maintained that the design options presented in the *February 2020 Visualization Booklet* minimized the effect of the I-495 NEXT project to the GW Parkway.

The *February 2020 Visualization Booklet* outlined four gateway options for traffic traveling from the Express Lanes and GP lanes from I-495 onto the GW Parkway. Three of the options involve the construction of a stone-faced wall, while one option proposes an alternation by laying back the slope to the south of the GW Parkway (Option 1).

- 03/17/2020—VDOT sent a letter to the SHPO to coordinate the effect determination for cultural resources that fall within the project’s Area of Potential Effects (APE).
- 04/07/2020—In response to VDOT’s March 17, 2020 letter, SHPO sent a letter that expressed their preference for Option 1, the option that proposed to lay back the slope to the south of the GW Parkway, versus the other three options presented in the *February 2020 Visualization Booklet*. The SHPO maintained that Option 1 is the preferred option because it would not result in the introduction of new features on the landscape. However, the SHPO withheld their decision on a final effect concurrence for the project in order to give the NPS an opportunity to review and comment on the four design options presented in the *February 2020 Visualization Booklet*.
- 04/08/2020—SHPO sent an additional letter that expanded their position from their April 7, 2020 letter related to possible effects on historic properties within the APE resulting from the selection of Option 1 as the preferred option. SHPO stated that in their letter dated April 7, 2020 that they believe of the four design options presented in the *February 2020 Visualization Booklet* that Option 1 as presently presented would have the least impact on the GW Parkway. SHPO further stated that if the NPS selects Option 1 to move to construction, the undertaking would likely have a “No Adverse Effect” on the GW Parkway. SHPO concluded the letter by stating that if one of the other proposed options is selected additional consultation with the SHPO on the project’s effect would become necessary.

- 04/29/2020—In response to VDOT’s March 17, 2020 Letter, VDOT received a response letter from the NPS stating that the agency agreed with VDOT’s “No Adverse Effect” determination for the I-495 NEXT project provided that VDOT moved forward with Option 1 from the *February 2020 Visualization Booklet*, further minimizes loss of forest, and mitigates the loss of forest. VDOT shall minimize, to the extent practicable, the amount of forest and vegetation removal deemed necessary to implement Option 1 and shall mitigate for forest removal on land within GW Parkway and land within VDOT right-of-way adjacent to the GW Parkway that transitions to the park entrance.
- 10/05/2020—In response to the EA, the NPS concurred via letter with VDOT’s “No Adverse Effect” determination provided that Option 1 from the *February 2020 Visualization Booklet* is implemented and VDOT further minimize loss of forest and mitigate for loss of forest in the vicinity where I-495 connects with the GW Parkway. Further, the NPS recommended that wall treatments on VDOT property complement existing walls and architecture along the GW Parkway.
- 01/14/2021—VDOT sent a letter to the SHPO to coordinate an effects determination for the cultural resources that fall within the APE for the I-495 NEXT project. Within the letter, VDOT provided a project overview, assessment of effect, and a determination of effect. In this letter, VDOT stated that they have determined the I-495 NEXT project would have “No Adverse Effect” on historic properties in accordance with 36 CFR 800.5(b), provided that conditions are imposed and implemented to avoid adverse effects on the GW Parkway and the Dead Run Ridges Archaeological District as well as its contributing archaeological sites.
- 01/19/2021— Meeting held between VDOT and the NPS to discuss comments received from the NPS on the *February 2020 I-495 NEXT Environmental Assessment*.
- 01/21/2021—The SHPO concurred via letter with VDOT’s “No Adverse Effect” determination provided that Option 1 from the *February 2020 Visualization Booklet* is implemented along with the other conditions highlighted in the “*Efforts to Minimize Harm and Mitigate Impacts Section*” below.
- 01/27/2021—VDOT sent an email informing the SHPO of FHWA’s intention to make a Section 4(f) *De minimis* finding based on the “No Adverse Effect” determination that was received for the GW Parkway as it is an NRHP listed property.
- 01/28/2021 — The SHPO sent an email acknowledging receipt of VDOT’s January 27, 2021 email.

To view copies of the letters/emails referenced above between VDOT, SHPO and the NPS see Appendix B.

### ***Permanent Incorporation of Land***

As previously mentioned, approximately 4.8 acres of the LOD lies within the boundary of the GW Parkway. Of the total 4.8 acres within the LOD, an estimated 2.5 acres lie directly adjacent to the GW Parkway’s existing roadway but would not be impacted by the I-495 NEXT project either temporarily or permanently and is therefore not a Section 4(f) use (see **Figure 3-7**). Anticipated permanent and temporary impacts are shown in **Table 3-2**. In addition, there would be a 1.3-acre special use permit for temporary occupancy during construction, described in the following section.

### ***Temporary Occupancy***



Planning-level estimates indicate a special use permit for temporary access to an area not to exceed approximately 1.3 acres would be needed for construction (see **Figure 3-7**). According to FHWA's regulations implementing Section 4(f), a temporary occupancy of Section 4(f) land does not constitute "use" under Section 4(f) if the following conditions are met (23 CFR 774.13(d)):

- Duration (of the occupancy) must be temporary (i.e., less than the time needed for construction of the project) and there should be no change in ownership of the land.

Occupancy, construction, and required access within the GW Parkway would take only as long as necessary, which would be less than the time needed to construct the overall I-495 NEXT project.

A special use permit is anticipated to allow construction activities and/or construction permits within a portion of the GW Parkway which will be effective only for the time needed to perform the work within the GW Parkway property and will not be used to provide staging or construction access to other portions of the project.

Following conclusion of the Section 4(f) review and the issuance of the NEPA decision document, the NPS is anticipated to issue VDOT a Special Use Permit for any temporary construction impacts or equipment access prior to work commencing on park lands.

- Scope of the work must be minor (i.e., both the nature and the magnitude of the changes are minimal).

Both the nature and the magnitude of the changes to the property will be minimal. Existing shrubs and grasses may be cleared. Temporary erosion and sediment controls will be installed and maintained throughout the duration of the construction to prevent soil erosion and to manage stormwater runoff. Areas that can support vegetation will be revegetated in accordance with the stipulations under the Efforts to Minimize Harm and Mitigate Impacts Section below.

- There are no anticipated permanent adverse physical impacts, nor will there be interference with the protected activities, features, or attributes of the property that qualify the property for protection under Section 4(f), on either a temporary or permanent basis.

The proposed special use permit is not anticipated to have permanent adverse impacts nor permanent or temporary interference on the activities or purpose of the GW Parkway. Land that is disturbed will be revegetated in accordance with the stipulations under the Efforts to Minimize Harm and Mitigate Impacts Section below after construction is complete.

- The land being used must be fully restored (i.e., the property must be returned to a condition which is at least as good as that which existed prior to the project)

The lands subject to any special use permits will be returned to a natural condition which is at least as good as that which existed prior to project construction. The GW Parkway will be revegetated in accordance with the stipulations under the Efforts to Minimize Harm and Mitigate Impacts Section below.

- There must be a documented agreement from the NPS regarding the above conditions

VDOT believes the proposed temporary occupancy of the GW Parkway does not constitute a use under Section 4(f) based on the above information. VDOT will request that the NPS concur in writing with this assessment prior to the issuance by FHWA of the NEPA decision document.

Section 4(f) De Minimis: Recreational

The GW Parkway is owned by the United States and administered by the NPS and as such is recognized as a Section 4(f) recreational resource. The GW Parkway is recognized as Federal parkland and contains a variety of recreational land uses including scenic driving, trails, parks and scenic vistas.

As noted above, Section 4(f) requirements may be met if FHWA determines that the use of the property will have a *de minimis* impact. In order for FHWA to make such a determination for publicly owned parks, recreation areas, and wildlife or waterfowl refuges:

- The project must not adversely affect activities, features, or attributes of the Section 4(f) property.

A permanent easement of approximately 0.9 acres from the GW Parkway is needed to construct the I-495 NEXT project. The area from which the easement would be acquired abuts the existing GW Parkway eastbound lanes and incorporates the removal of vegetation necessary for the construction of the tie-in and fly-over ramps (located outside the GW Parkway boundary). Acquisition of this easement would not adversely affect the activities, features, or attributes of the Section 4(f) property (see **Figure 3-7**).

The public will maintain the ability to use the GW Parkway for scenic recreational driving as well as for the visitation to the GW Parkway's associated recreational features (trails, parks or scenic vistas). Access to all of these recreational features (scenic driving, trails, parks or scenic vistas) would be maintained at all times by the Design-Build contractor. Minor changes in noise levels could occur due to closer proximity of highway right-of-way and visual quality due to vegetation clearing.

Where appropriate, existing I-495 guide signage would be consolidated to reduce the overall number of signs appearing in one area of the GW Parkway, while in one new location a new guide sign would be added to the existing viewshed. Additional signage on GW Parkway would require a Special Use Permit. Views of the Potomac River and Potomac Palisades will be maintained with no impact to existing viewsheds. VDOT will also implement Option 1 from the *February 2020 Visualization Booklet* along with the other conditions highlighted in the Efforts to Minimize Harm and Mitigate Impacts Section below.

For permanent easement impacts, a highway easement deed would be executed between FHWA and VDOT in accordance with 23 CFR 107.

- There must be public notice and opportunity for public review and comment concerning the effects on the protected activities, features, or attributes of the property that qualify the property for Section 4(f) protection.

VDOT provided the public with the opportunity to review and comment on the effects and the proposed *de minimis* impact during the October 5, 2020 and October 8, 2020 Public Hearing. Comments received from the public following the Public Hearing stated that coordination with the NPS was necessary due to the LOD encompassing portions of the GW Parkway. No comments

from the public were received that were explicitly related to Section 4(f) impacts to the GW Parkway.

- OWJ over the recreational resource must concur that the project will not adversely affect the activities, features, or attributes of the recreational resource.

This concurrence will be sought from the NPS prior to the issuance by FHWA of the NEPA decision document.

#### Section 4(f) De Minimis: Historic Property

As previously mentioned in the Section 4(f) De Minimis- Recreation Section above, a permanent easement of approximately 0.9 acres from the GW Parkway is needed to construct the I-495 NEXT project. The area from which the easement would be acquired abuts the existing GW Parkway eastbound lanes and incorporates the removal of vegetation necessary for the construction of the tie-in and fly-over ramps (located outside the GW Parkway boundary).

With regard to historic impacts related to the GW Parkway, VDOT's assessment of effects has been informed by two documents: the NRHP nomination for the GW Parkway prepared by the NPS in 1995 (NPS, 1995) and the Cultural Landscape Inventory (CLI) for the North Parkway published by the NPS in 2009 (NPS, 2009). The NHP nomination specifically excludes the I-495/GW Parkway interchange for the defined historic property, and most I-495 NEXT project elements are located within the excluded interchange. In addition, the CLI identifies certain aspects of the North Parkway that are important landscape elements including views of the Potomac Palisades, stone walls, the tree canopy and the configuration of the GW Parkway itself.

Of those elements, only the tree canopy and the GW Parkway's configuration of the GW Parkway itself are within the project's APE. Alteration of the canopy would occur only as a result of the I-495 NEXT project in an area that had minimal forest cover during the GW Parkway's period of significance defined in the NRHP nomination (see **Figure 3-8**). Additionally, during construction, areas of vegetation removal or disturbance both on land within GW Parkway and land within VDOT right-of-way adjacent to the GW Parkway that transitions to the park entrance to the maximum extent practicable to maintain the transition environment in to the GW Parkway. Further, the overall configuration of the GW Parkway itself would be altered only by extending the existing merge taper for a distance of approximately 1,150 feet within the NRHP boundaries of the GW Parkway. It is VDOT's opinion that neither of these alterations to character-defining features of the GW Parkway rise to the level of diminishing those features.

As noted in previous sections, Section 4(f) requirements may be met if FHWA determines that the use of the property will have a *de minimis* impact. In the case of the I-495 NEXT project, the GW Parkway is listed on the NRHP and is therefore subject to the requirements of Section 4(f) as a historic property. In order for FHWA to make such a determination for historic resources, the following conditions must be met:

- Written concurrence on a Section 106 finding of "no adverse effect" or "no historic properties affected" must be received from the SHPO.

On January 21, 2021, the SHPO concurred with VDOT's "No Adverse Effect" determination provided that Option 1 from the *February 2020 Visualization Booklet* is implemented along with the other conditions highlighted in the Efforts to Minimize Harm and Mitigate Impacts Section below.



The public will maintain the ability to use the GW Parkway for scenic recreational driving as well as for the visitation to the GW Parkway’s associated recreational features (trails, parks or scenic vistas). Access to all of these recreational features (scenic driving, trails, parks or scenic vistas) would be maintained at all times by the Design-Build contractor. Minor changes in noise levels due to closer proximity of highway right-of-way and visual quality due to vegetation clearing could occur.

Where appropriate, existing I-495 guide signage would be consolidated to reduce the overall number of signs appearing in one area of the GW Parkway, while in one new location a new guide sign would be added to the existing viewshed. Additional signage on GW Parkway property would require a Special Use Permit. Views of the Potomac River and Potomac Palisades will be maintained with no impact to existing viewsheds.

For permanent easement impacts, a Highway Easement Deed would be executed between FHWA and VDOT in accordance with 23 CFR 107.

- The SHPO must be informed of FHWA’s intent to make a de minimis impact determination based on their concurrence in the finding of “no adverse effect” or “no historic properties affected.”

Following the “No Adverse Effect” determination received on January 21, 2021, VDOT informed the SHPO of FHWA’s intent to make a *de minimis* impact determination on January 27, 2021 via email.

- The Section 106 consulting parties must be consulted.

As outlined previously, multiple coordination meetings have been attended and/or correspondence sent between the NPS, SHPO and VDOT.

**Table 3-2. Impacts to the George Washington Memorial Parkway**

	Permanent Impacts* (Acres)	Temporary Impacts** (Acres)
Proposed Section 4(f) Impacts to the George Washington Memorial Parkway	0.9	1.3

\* Permanent impacts are anticipated to be *De Minimis* under 23 CFR 774.7(b). Temporary impacts are anticipated to fall under an exception to Section 4(f) regulations under 23 CFR 774.13 (d) (Temporary Occupancy).

\*\* Note: Following conclusion of the Section 4(f) review and the issuance of the NEPA decision document, the NPS is anticipated to issue VDOT a Special Use Permit for any temporary impacts. For permanent impacts, a highway easement deed would be executed between FHWA and VDOT in accordance with 23 CFR 107.

Source: VDHR V-CRIS GIS Data, 2018; NPS GIS Data, 2019

***Efforts to Minimize Harm and Mitigate Impacts***

Based on on-going coordination efforts between VDOT, the NPS and the SHPO, the following measures to minimize harm and mitigate impacts to the GW Parkway have been identified. These conditions were agreed upon via letter by VDOT and the SHPO (VDHR) on January 21, 2021 (see Appendix B):

- VDOT shall include design constraints in the Request for Proposals requiring the Design-Build contractor to remain within the current LOD where possible in designing and constructing project improvements in the vicinity of Archaeological Sites 44FX0374, 44FX0379, 44FX0389, and 44FX2430. VDOT shall ensure that the Concessionaire (Design-Build contractor) includes a Special Provision in the contract requiring that safety fencing is erected along the LOD to ensure

avoidance of any ground disturbance to Sites 44FX0374, 44FX0379, 44FX0389, or 44FX2430 during construction of the project, or by construction vehicles entering and leaving the project corridor.

- VDOT shall implement Option 1 as presented in the *February 2020 Visualization Booklet* and selected by the SHPO and the NPS as the preferred option for the I-495 NEXT project.
- VDOT shall construct any infrastructure associated with the NPS-selected gateway Option 1 in accordance with NPS specifications. VDOT does not propose constructing any walls on NPS lands in Option 1 as part of the Build Alternative. Any shoulder wall infrastructure (e.g, retaining walls) within VDOT ROW that is in the transition area immediately adjacent to the GW Parkway property will be compatible with and complementary to the GW Parkway stone wall character.
- VDOT shall install any necessary plantings on NPS lands associated with the NPS-selected gateway option in accordance with NPS specifications.
- VDOT shall minimize the amount of forest removal and mitigate for forest removal deemed necessary to implement Option 1.
- VDOT shall coordinate with NPS regarding the design and location of the signage to be installed within the GW Parkway for the I-495 NEXT project.
- VDOT shall consult with the GW Parkway and the SHPO at major milestones in project design to ensure the design remains consistent with these conditions to avoid adverse effects on the GW Parkway.
- On-going design minimization efforts to reduce the project's physical project footprint and impervious surface area within the GW Parkway boundary.
- Continued collaboration with the NPS on potential enhancements to the visitor's "sense of arrival" including potentially relocating the GW Parkway entrance sign to a more prominently visible location within the park.
- Preparation of several preliminary design concepts and viewshed visualizations of potential projects impacts at the park boundary interface. This information was provided to the NPS in meetings on December 12, 2019 and January 23, 2019 and refined for submittal on February 6, 2020; the potential concepts and visualizations are included for review in Appendix A of this document.
- Completion of a tree survey in the vicinity of the eastbound GW Parkway lanes, with a commitment to minimize impacts to mature and healthy trees, and to restore vegetation disturbed by construction (including the use of native seed mix and re-planting of trees per NPS's tree replacement ratio of 1:1).
- On-going efforts to consolidate/reduce existing I-495 guide signage within the westbound lanes of the GW Parkway.
- Replacement of guide signing for the GW Parkway on the Capital Beltway to include new sign elements with brown backgrounds.

- Location of the Virginia toll signing outside of the park boundary.



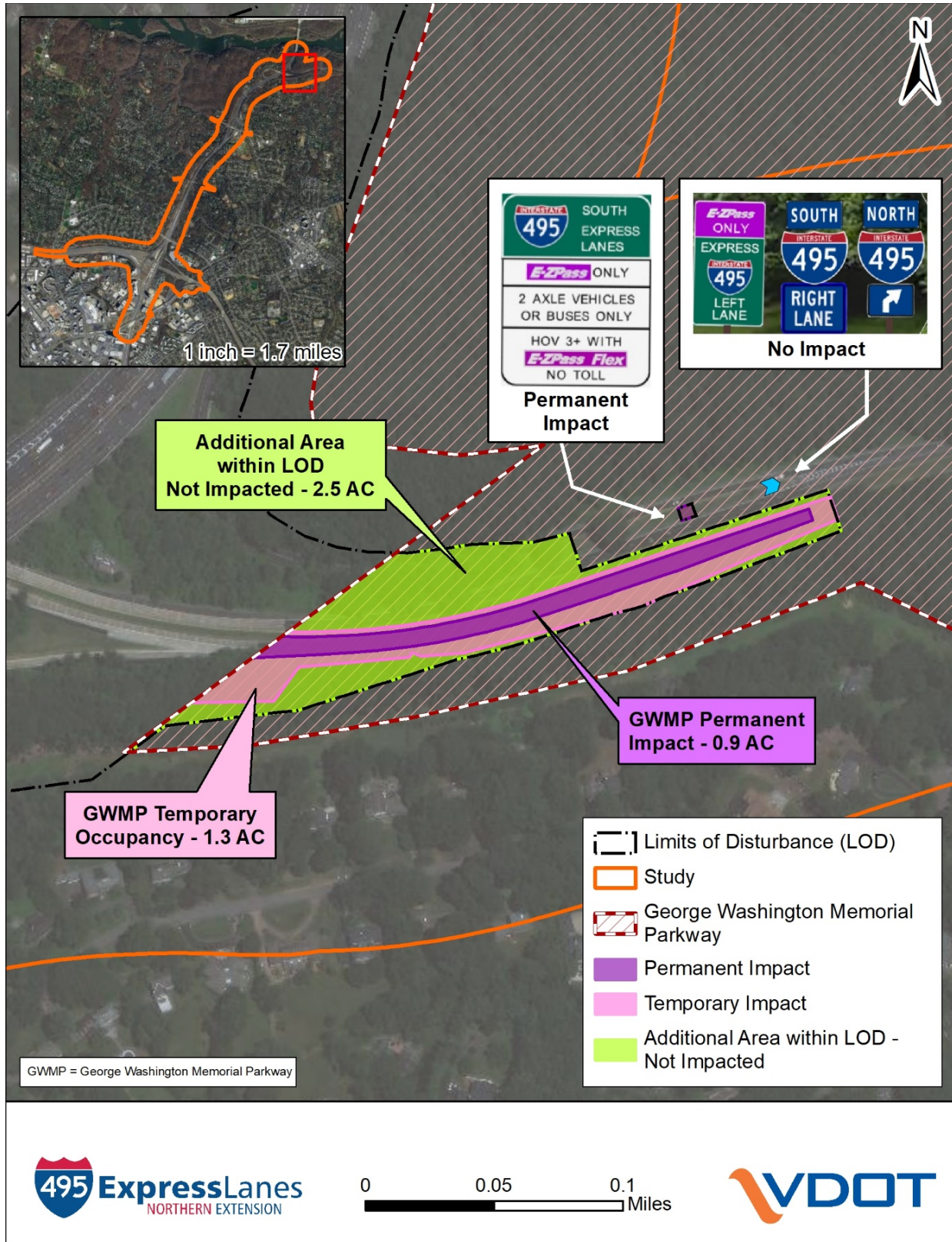


Figure 3-7. Section 4(f) Impacts Related to the George Washington Memorial Parkway



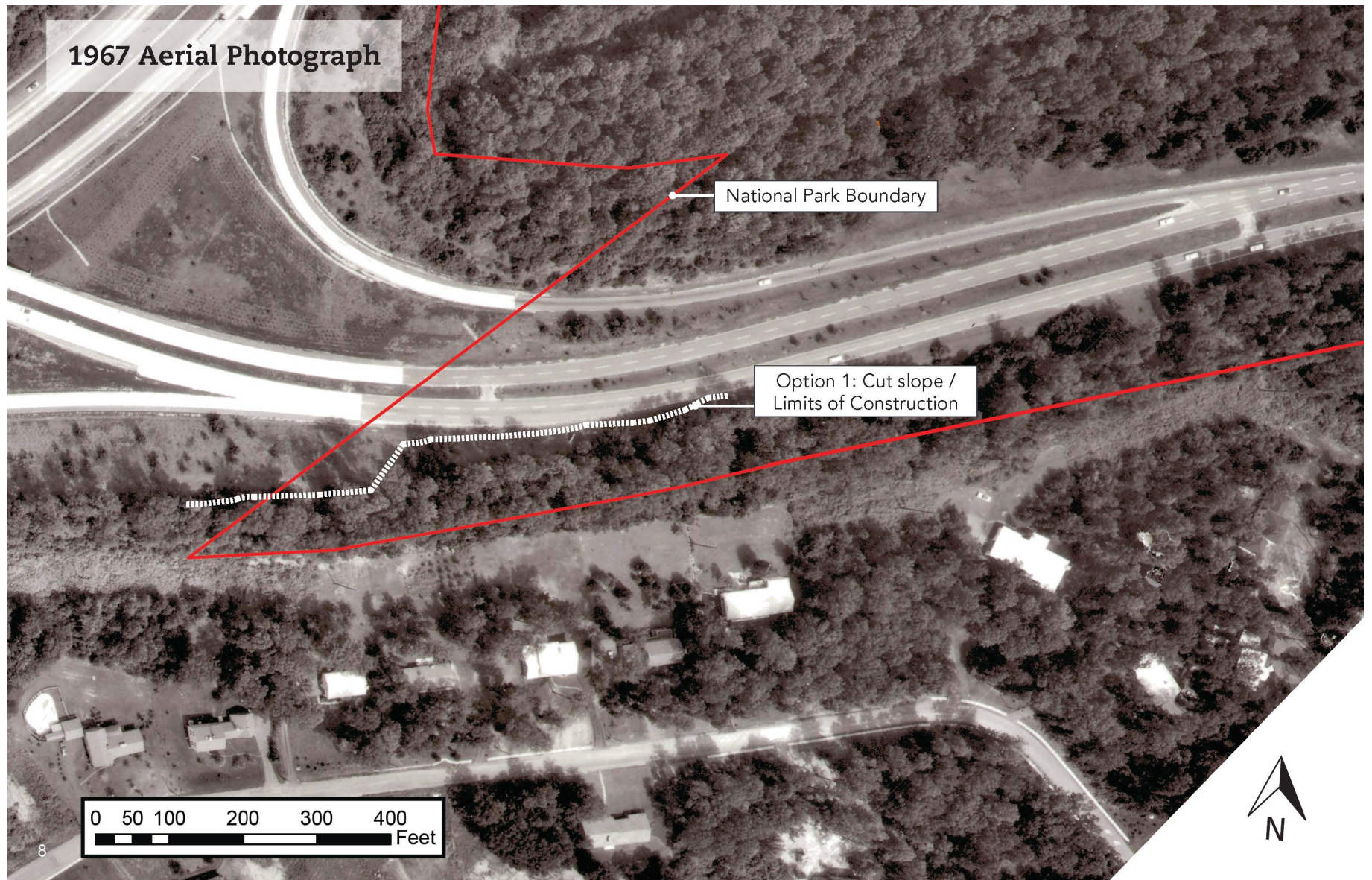


Figure 3-8. 1967 Aerial Photography (Period of Significance) - Option 1 from the February 2020 Visualization Booklet

### **3.6.2 Scott's Run Nature Preserve**

#### ***Coordination***

VDOT initiated coordination with the FCPA through scoping correspondence. Individual meetings have also been conducted with the FCPA and are detailed below.

- 04/09/2019—VDOT provided the FCPA with a scoping letter that introduced the project including a project overview and project next steps.
- 07/01/2019—Coordination meeting held between VDOT and FCPA to provide a project status update and present the preliminary impacts to the Scott's Run Nature Preserve as a result of the I-495 NEXT project. This meeting also included an introduction of the potential Section 4(f) *de minimis* approach.
- 12/20/2019—VDOT met with representatives from Dominion Energy and the FCPA regarding potential impacts to the Virginia Electric Power Company (now Dominion Energy) easement and discussed strategies to minimize easement impacts in the Scott's Run Nature Preserve.
- 02/06/2020—Coordination meeting held between VDOT and FCPA to provide a project status update and to present the revised impacts to the Scott's Run Nature Preserve as a result of the I-495 NEXT project, including a draft Section 4(f) *de minimis* letter.
- 06/06/2020—VDOT and FCPA held a meeting to discuss the Section 4(f) *de minimis* impacts, Section 4(f) exception for temporary occupancy and Section 6(f) impacts related to the Scott's Run Nature Preserve. In addition, the potential for extending the existing noise wall within the Scott's Run Nature Preserve was discussed.
- 06/19/2020—As a follow-up to the June 6, 2020 meeting, FCPA sent a coordination letter to VDOT outlining proposed mitigation strategies for impacts related to the Scott's Run Nature Preserve.
- 08/20/2020—VDOT met with representatives from the FCPA to discuss FCPA's mitigation requests from the June 19, 2020 letter.
- 01/06/2021—VDOT met with representative from the FCPA to discuss potential replacement land options to satisfy Section 6(f) requirements associated with any acquisition of parkland.
- 02/05/2021—VDOT met with representatives from the FCPA to discuss FCPA's mitigation requests from the June 19, 2020 letter as well as to discuss the potential replacement land location for the Scott's Run Nature Preserve.

To view copies of the letters/emails referenced above between VDOT and the FCPA see Appendix B.

#### ***Permanent Incorporation of Land***

As previously mentioned, approximately 4.11 acres of the LOD lies within the boundary of the Scott's Run Nature Preserve. Anticipated permanent and temporary impacts are shown in Table 3-3. In addition, there would be a 3.01-acre temporary occupancy during construction, described in the following section.



Temporary Occupancy

Planning-level estimates indicate a temporary grading and construction easement not to exceed 3.01 acres would be needed for grading and construction access (see **Table 3-3** and **Figure 3-9**). According to FHWA's regulations implementing Section 4(f), a temporary occupancy of Section 4(f) land does not constitute "use" under Section 4(f) if the following conditions are met (23 CFR 774.13(d)):

- Duration (of the occupancy) must be temporary (i.e., less than the time needed for construction of the project) and there should be no change in ownership of the land.

Occupancy, construction, and required access within Scott's Run Nature Preserve would take only as long as necessary, which would be less than the time needed to construct the overall I\_495 NEXT project.

A temporary easement is anticipated to allow construction activities within a portion of the Scott's Run Nature Preserve which will be effective only for the time needed to perform the work within the Scott's Run Nature Preserve property and will not be used to provide staging or construction access to other portions of the I-495 NEXT project.

- Scope of the work must be minor (i.e., both the nature and the magnitude of the changes are minimal).

Both the nature and the magnitude of the changes to the property will be minimal. Existing shrubs and grasses may be cleared. Temporary erosion and sediment controls will be installed and maintained throughout the duration of the construction to prevent soil erosion and to manage stormwater runoff. Areas that can support vegetation will be reseeded and/or planted with appropriate ground cover.

- There are no anticipated permanent adverse physical impacts, nor will there be interference with the protected activities, features, or attributes of the property that qualify the property for protection under Section 4(f), on either a temporary or permanent basis.

The proposed temporary easement for construction is not anticipated to have permanent adverse impacts nor permanent or temporary interference on the activities or purpose of Scott's Run Nature Preserve. Land that is disturbed will be restored to its natural condition as soon as possible after construction is complete.

- The land being used must be fully restored (i.e., the property must be returned to a condition which is at least as good as that which existed prior to the project)

The lands subject to any temporary easement for construction will be returned to a natural condition which is at least as good as that which existed prior to project construction. The Scott's Run Nature Preserve will be revegetated with appropriate species and, if necessary, some hardened materials may be placed in areas where erosion is possible, and revegetation would be difficult due to shading.

- There must be a documented agreement from the FCPA regarding the above conditions

VDOT believes the proposed temporary occupancy of the Scott's Run Nature Preserve does not constitute a use under Section 4(f) based on the above information.



VDOT has requested that the FCPA concur in writing with this assessment prior to the issuance by FHWA of the NEPA decision document.

Section 4(f) De Minimis: Recreational

Based on preliminary calculations, the I-495 NEXT project is anticipated to require permanent fee simple incorporation of up to approximately 1.10 acres of Scott's Run Nature Preserve property, consisting of a strip of land along an existing noise barrier that does not contain any recreational features of the Scott's Run Nature Preserve.

As noted above, Section 4(f) requirements may be met if FHWA determines that the use of the property will have a *de minimis* impact. In order for FHWA to make such a determination for publicly owned parks, recreation areas, and wildlife or waterfowl refuges, the following conditions must be met:

- The project must not adversely affect activities, features, or attributes of the Section 4(f) property.

The proposed land acquisition of approximately 1.10 acres of the Scott's Run Nature Preserve is located adjacent to the existing noise barrier that runs along I-495 and would not adversely affect activities, features, or attributes of the Section 4(f) property (see **Figure 3-9**). Public access to the Scott's Run Nature Preserve would not be impacted by the I-495 NEXT project and access would continue to follow the FCPA's normal operating hours. No changes to the current trail system configuration within the Scott's Run Nature Preserve is anticipated. Minor changes in noise levels due to closer proximity of highway right-of-way and visual quality due to vegetation clearing could occur.

- There must be public notice and opportunity for public review and comment concerning the effects on the protected activities, features, or attributes of the property that qualify the property for Section 4(f) protection.

VDOT provided the public with an opportunity to review and comment on the effects of the proposed *de minimis* impact during the October 5, 2020 and October 8, 2020 Public Hearing. Comments received from the public following the Public Hearing expressed some concerns about impacts of the I-495 NEXT project on the environment, including some specifically related to encroachment into the Scott's Run Nature Preserve. No comments from the public were received that were explicitly related to Section 4(f) impacts to the Scott's Run Nature Preserve.

- OWJ over the recreational resource must concur that the project will not adversely affect the activities, features, or attributes of the recreational resource.

This concurrence will be sought prior to the issuance by FHWA of the NEPA decision document.

**Table 3-3. Impacts to the Scott’s Run Nature Preserve**

	Permanent Impacts* (Acres)	Temporary Impacts (Acres)
Proposed Right-of-Way Acquisition from Scott’s Run Nature Preserve	0.29	None
Proposed Right-of-Way Acquisition from Virginia Electric Power Company Easement **	0.81	None
Area Between Proposed Right-of-Way/Easement Limits and Limit of Disturbance	None	3.01
<b>Total Impacts to Scott’s Run Nature Preserve</b>	<b>1.10</b>	<b>3.01</b>
Remaining Existing Virginia Electric Power Company Easement (Non-Section 4(f) Impact)	1.37	None

\* Permanent impacts are anticipated to be De Minimis under 23 CFR 774.7(b). Temporary impacts are anticipated to fall under an exception to Section 4(f) regulations under 23 CFR 774.13 (d) (Temporary Occupancy).

\*\*The proposed right-of-way acquisition within the Virginia Electric Power Company easement (land that is owned by the FCPA) is land being converted to a transportation facility and is therefore subject to the requirements of Section 4(f).

Note: Virginia Electric Power Company is now Dominion Energy

Source: VDHR V-CRIS GIS Data, 2018

**Efforts to Minimize Harm and Mitigate Impacts**

VDOT will adhere to the following minimization efforts and mitigation measures for the Scott’s Run Nature Preserve:

- VDOT will avoid impacts to the recreational use of the property so that the project will not adversely affect activities, features, or attributes of the Scott’s Run Nature Preserve.
- VDOT will minimize potential encroachment into Scott's Run Nature Preserve by staying within utility easement, to the extent possible, within the boundaries of the Scott’s Run Nature Preserve.
- VDOT commits to providing FCPA design plans to review as the project progresses through the Design-Build process following completion of the NEPA process. VDOT expects these plans to be reviewed by the FCPA within three weeks of submittal.
- VDOT agrees to return any areas with temporary construction impacts on FCPA land to its pre-construction condition (like to like).
- VDOT commits to mitigation/compensation for impacts to those areas outside of the required replacement land area. The permanent fee simple area will be compensated with replacement land.
- VDOT agrees to mitigate/compensate for permanent impacts to natural resources on FCPA managed lands. This requirement shall apply to any natural resource impact (terrestrial or aquatic) that is not regulated under the jurisdiction of any federal or state agency.
- VDOT will stabilize the construction footprint with native seed mix. Once construction is complete, VDOT will rehabilitate these areas to the habitat type based on whether it is a temporary or permanent impact. VDOT will compensate FCPA to design, install and maintain these rehabilitated areas for up to three (3) years.

- The Design-Build Team will be required to follow *FCPA Manual Policy 201*. *FCPA Manual Policy 201* will also be referenced in the Technical Requirements of the Design-Build Request for Proposals for the project.
- The Technical Requirements of the Design-Build Request for Proposals will include the LOD as a design constraint. Any design changes that extend beyond the LOD that was previously coordinated will require further consultation with the SHPO (VDHR), the OWJ, FHWA, and other consulting parties as necessary.
- As part of the overall design for the I-495 NEXT project design, the Build Alternative includes an approximately 3.1-mile, 10-foot-wide shared use path, consistent with the *Fairfax County Countywide Trails Plan Map* (FCDPZ, 2018) that would provide improved local access to the Scott's Run Nature Preserve trail system (see **Figure 3-10**). The path is proposed to begin near the south end of the project corridor at Timberly Lane near Lewinsville Road and continue north along the west side of I-495 behind the proposed noise barrier. The path would also have a connection to existing and proposed bicycle and pedestrian facilities along Georgetown Pike, tying in just west of the Georgetown Pike interchange. The path is proposed to then cross I-495 on the south side of the proposed Georgetown Pike bridge and turn north at the Balls Hill Road intersection where it would continue along the west side of Balls Hill Road to the GW Parkway interchange. The northern limits of the path would be constructed so that it may connect in the future to a proposed pedestrian crossing of the Potomac River adjacent to the ALMB. The path would also provide access to the widened sidewalk on the new Live Oak Drive bridge where it crosses I-495 (just south of the GW Parkway interchange), and provide a connection to the trail system in Scott's Run Nature Preserve as well as the Potomac Heritage Trail.
- In order to provide a seamless connection between the proposed shared use path and Scott's Run Nature Preserve, VDOT will construct the following sidewalk and trail connections as part of the Build Alternative:
  - A new sidewalk along Georgetown Pike (north side) between the I-495 interchange and Liganore Drive will be constructed, connecting with the existing trail that leads to the main entrance of the preserve.
  - The Georgetown Bridge will be widened, and a new sidewalk will be constructed on the north side of the I-495 Bridge and extend beyond the bridge to Balls Hill Road as well as to the I-495 proposed shared use path as described above.
  - Crosswalks will be constructed to connect to the I-495 proposed shared use path and new sidewalks on both sides of I-495, providing improved options for pedestrians and bicyclists to gain access to the existing trail west of Linagnore Drive leading to Scott's Run Nature Preserve.
- Section 6(f) replacement land (see Section 4.0 of this document for more information) has been identified for permanent impacts related to the Scott's Run Nature Preserve through coordination with FCPA. The replacement land parcel is located at the corner of Balls Hill Road and Georgetown Pike and is approximately 1.48 acres in size (See **Figure 3-11**).



Currently, the parcel is owned by VDOT, used as an unpaved maintenance staging area with access provided off of Balls Hill Road. VDOT proposes to transfer ownership of the parcel to the FCPA for future use as additional parking for individuals visiting the Scott's Run Nature Preserve. (FCPA had indicated that the existing east parking lot frequently overflows during high demand, with visitors parking along the side of Georgetown Pike.) The construction of improvements to create a parking lot and supporting infrastructure (drainage, sidewalks, etc.) on the proposed parcel is excluded from the project and would be performed by others.

In order to ensure that the proposed land could adequately handle future parking demands, VDOT developed an illustrative parking lot site plan showing a possible layout (to be implemented by others) as shown in **Figure 3-12**. The sidewalk connections described above would connect the proposed replacement land to the Scott's Run Nature Preserve.



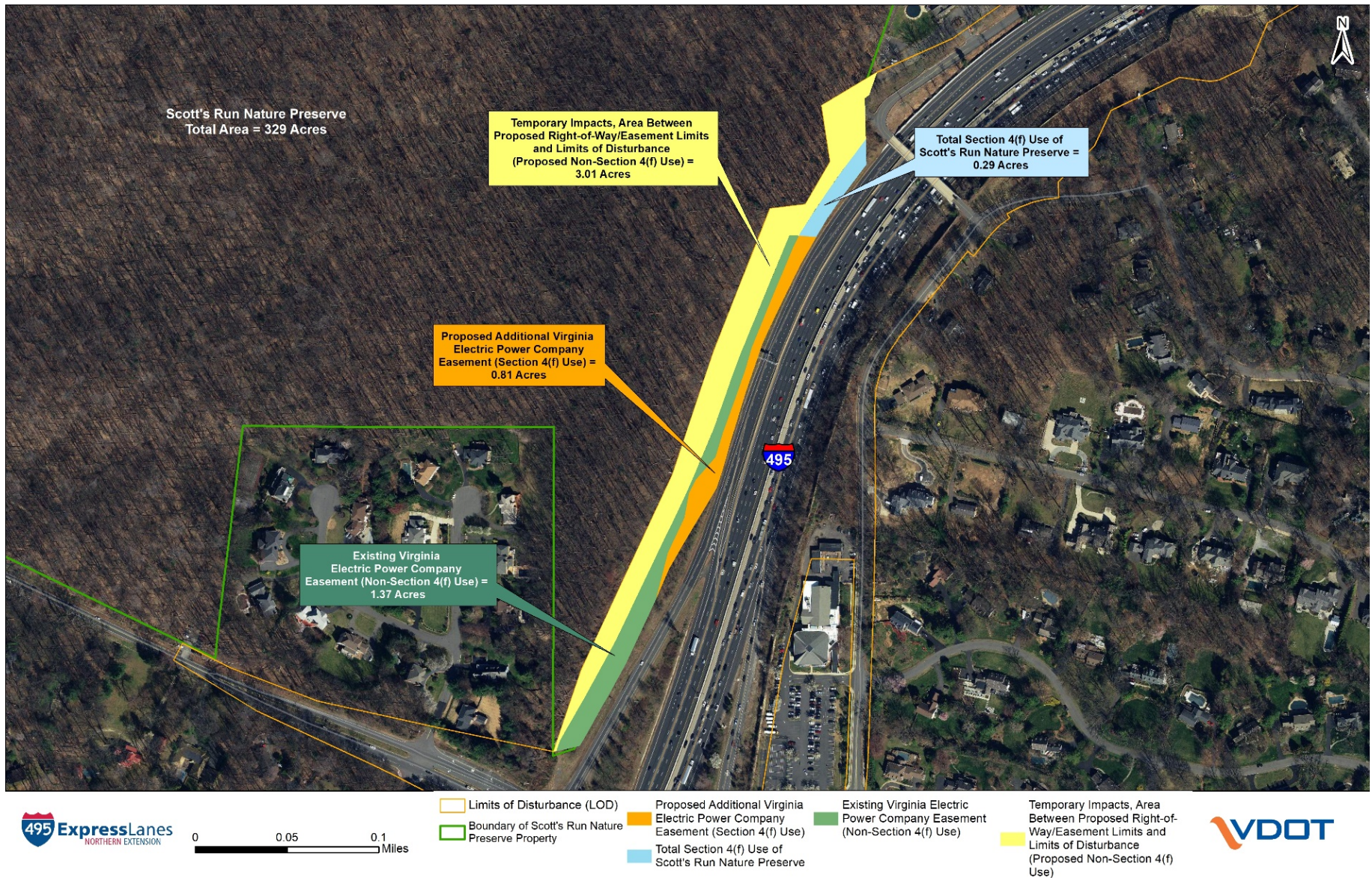


Figure 3-9. Section 4(f) Impacts Related to Scott's Run Nature Preserve



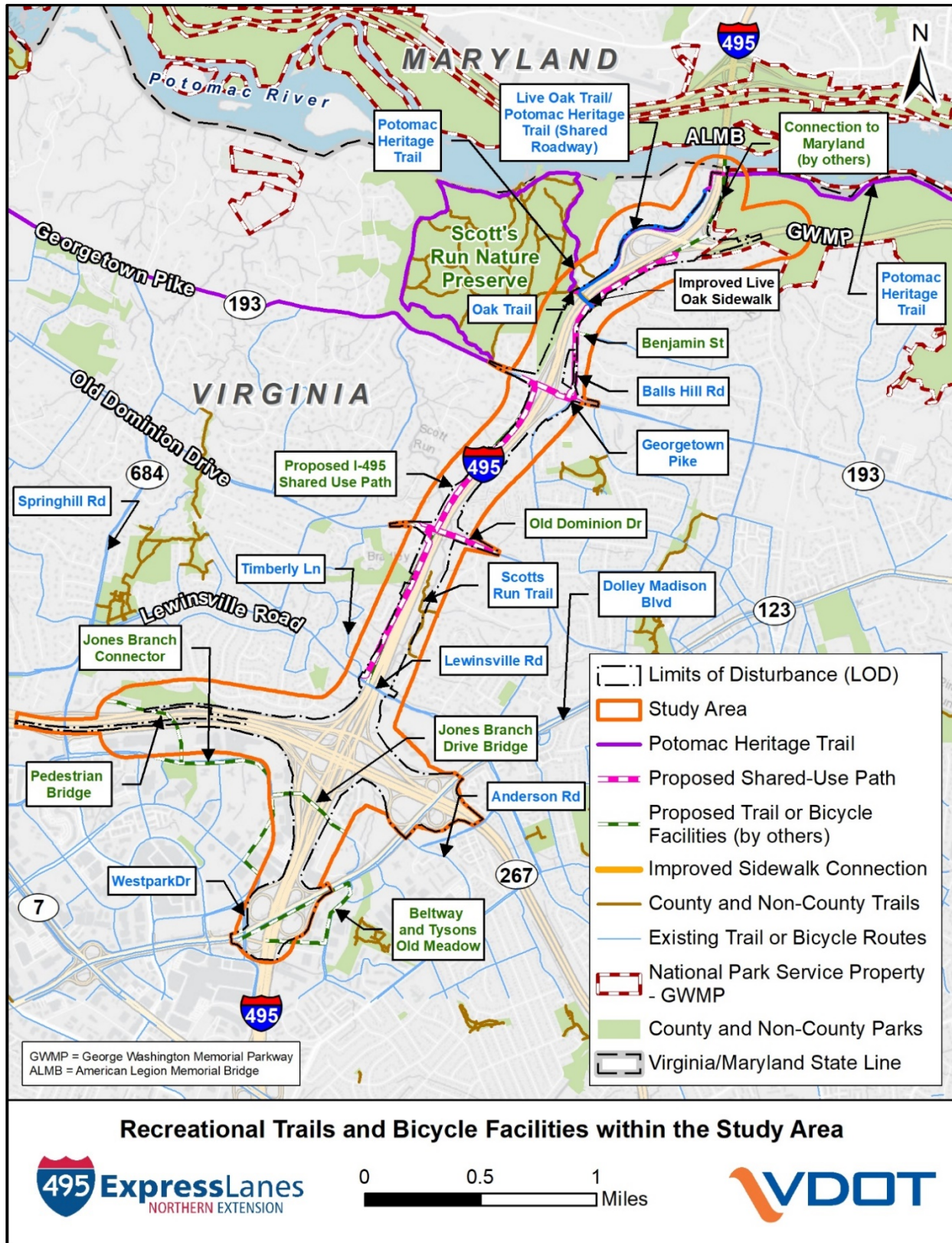


Figure 3-10. Proposed Shared Use Path



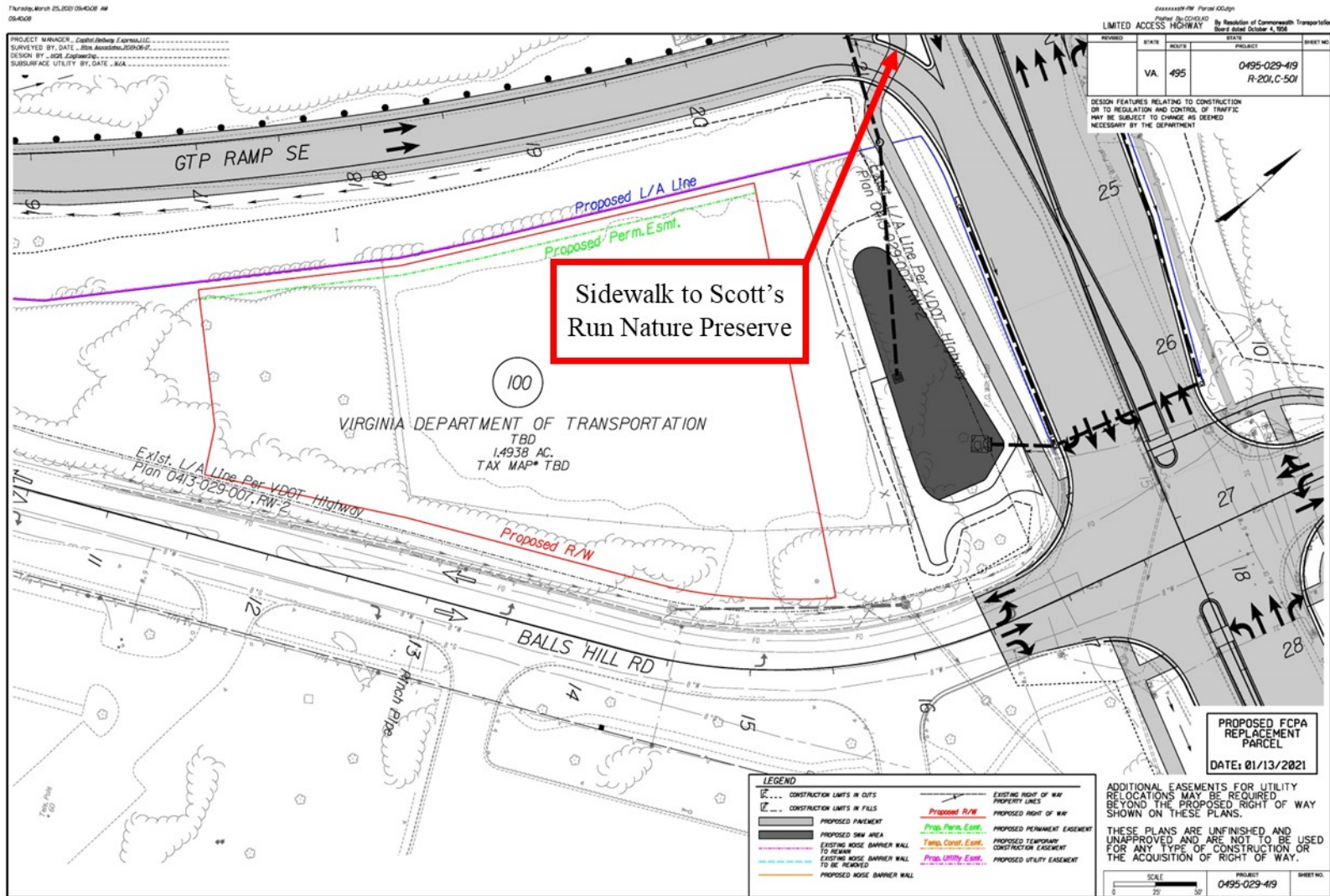


Figure 3-11. Scott's Run Nature Preserve - Proposed Replacement Land

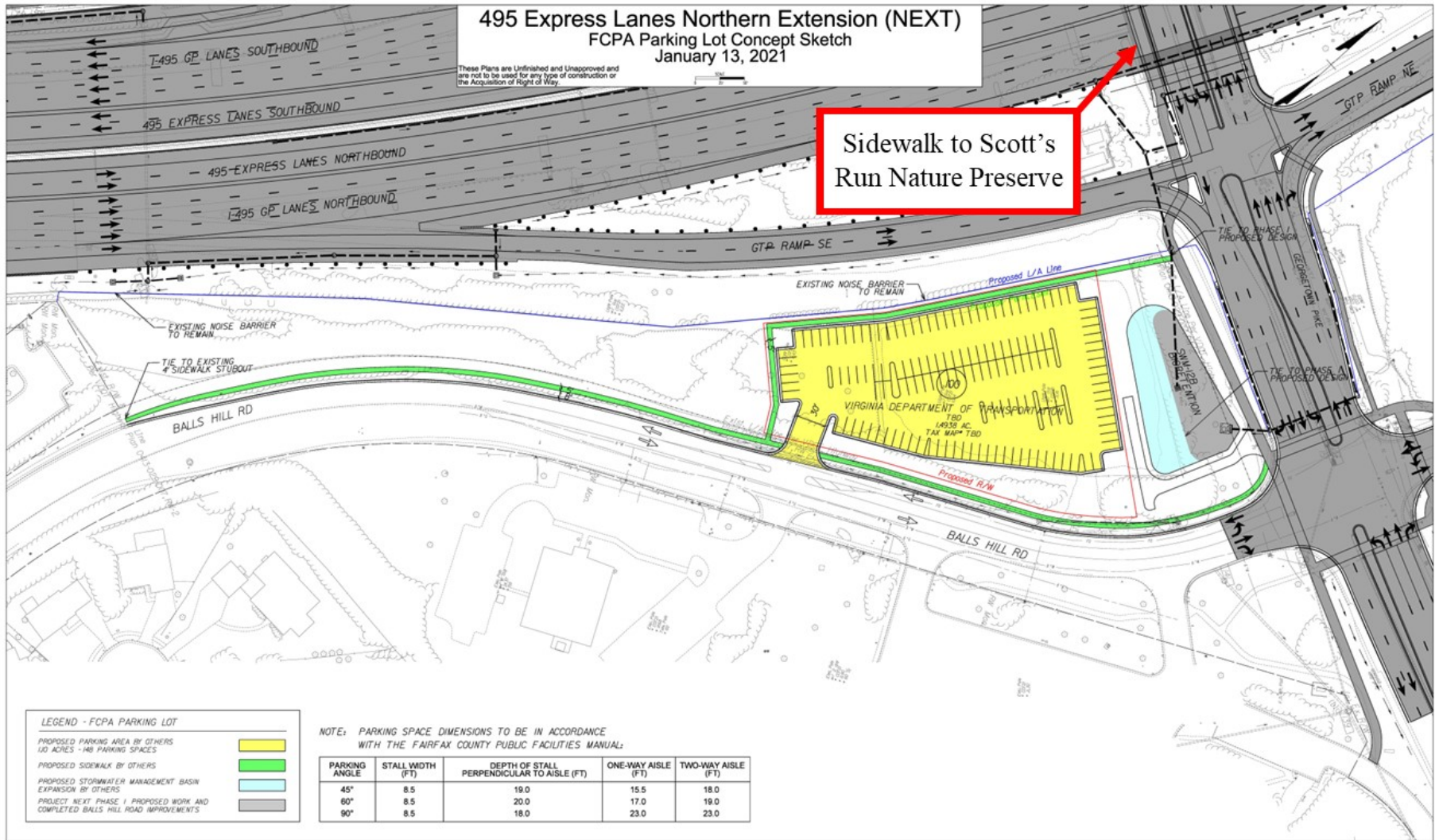


Figure 3-12. Scott's Run Nature Preserve- Replacement Land- Potential FCPA Parking Lot Layout Sketch

## 4.0 SECTION 6(F)

### 4.1 SECTION 6(F) RESOURCES

The Land and Water Conservation Fund Act of 1965 (Public Law 88-578) was enacted to preserve, develop, and assure accessibility to outdoor recreation resources by:

- Providing funds for and authorizing federal assistance to the states in planning, acquisition, and development of needed land and water areas and facilities, and
- Providing funds for the federal acquisition and development of certain lands and other areas.

The Act authorized the establishment of the Land and Water Conservation Fund (LWCF) which is funded by the revenue from fees paid to the federal government for offshore drilling, surplus property sales, motorboat fuels tax, and other revenues. The program is administered by the NPS through regulations 36 CFR 59.

Section 6(f) (as codified under 36 CFR 59.3) prohibits the conversion of property acquired or developed with grants from this fund to a non-recreational purpose without the approval of the NPS. The NPS can approve such conversion only if it is in accordance with the existing comprehensive statewide outdoor recreation plan and only upon such conditions as deemed necessary to “assure the substitution of other recreational properties of at least equal fair market value and of reasonably equivalent usefulness and location” (36 CFR 59.3). Protection of lands under Section 6(f) includes all parks and other sites that have been the subject of LWCF grants to states and localities whether for acquisition of parkland, development, or rehabilitation of facilities.

The Section 6(f) conversion process is usually conducted jointly by the Virginia Department of Environment and Conservation (VDCR) and the NPS following the completion of the NEPA process. Information on Section 6(f) resources in Fairfax County were obtained by contacting the FCPA.

#### 4.1.1 Section 6(f) Impacts

The Scott’s Run Nature Preserve (described in Section 3.2.2) was developed with money from the LWCF. Therefore, the Scott’s Run Nature Preserve is afforded additional protection under Section 6(f) of the Act. Under the Build Alternative, a conversion of Section 6(f) land is anticipated to occur as a result of construction of the I-495 NEXT project. The LOD would utilize approximately 4.11 acres of land from the Scott’s Run Nature Preserve and is a worst-case estimate based on best available design information (see **Table 4-1** and **Figure 4-1**). Of the 4.11 acres of the Scott’s Run Nature Preserve within the LOD, approximately 3.01 acres of land would be subject to a temporary conversion to a non-recreational use lasting less than six months. The remaining 1.10 acres of the Scott’s Run Nature Preserve within the LOD would be a permanent incorporation of recreational land to a transportation use and would require replacement in accordance with Section 6(f).

Land that would be permanently converted from the Scott’s Run Nature Preserve abuts existing I-495 right-of-way and is currently wooded with no pedestrian or recreational use. Therefore, no changes to the current trail configuration within the Preserve is anticipated. Minor changes in noise levels and visual quality could occur. Access to the Scott’s Run Nature Preserve would not be impacted by the Build Alternative and would remain as it currently exists.



**Table 4-1. Section 6(f) Impacts to the Scott’s Run Nature Preserve**

	Permanent Impacts* (Acres)	Temporary Impacts* (Acres)
Proposed Section 6(f) Impacts to the Scott’s Run Nature Preserve	1.10	3.01

\* Permanent impacts refer to the permanent incorporation of recreational land to a transportation use. Temporary impacts refer to a temporary conversion to a non-recreational use lasting less than six months

Note: Virginia Electric Power Company (now Dominion Energy)

Source: VDHR V-CRIS GIS Data, 2018

#### 4.1.2 Coordination

During early coordination efforts, as well as on-going Section 4(f) coordination activities, the FCPA noted that the Scott’s Run Nature Preserve was acquired and developed with assistance from the LWCF and requested that VDOT facilitate the identification of Section 6(f) replacement land. As noted in Section 3.2.2, the Build Alternative would incorporate portions of the Scott’s Run Nature Preserve to highway right-of-way. This conveyance of Scott’s Run Nature Preserve land will constitute a “conversion of use” under Section 6(f) of the LWCF Act.

A search of available replacement land near the existing Scott’s Run Nature Preserve has been conducted to identify Section 6(f) replacement property. As described in Section 3.4.2, potential replacement land has been identified at the corner of Balls Hill Road and Georgetown Pike. The parcel is currently owned by VDOT, with access provided off of Balls Hill Road. VDOT proposes to transfer ownership of the parcel to the FCPA for future use as additional parking for individuals visiting the Scott’s Run Nature Preserve. Sidewalk connections proposed as part of the Build Alternative would connect the parking lot directly to the Scott’s Run Nature Preserve, as shown in **Figure 3-11** and **Figure 3-12**.

Prior to the transfer of ownership from VDOT to the FCPA, VDCR and NPS must both agree that the replacement land is adequate for permanent impacts related to the Scott’s Run Nature Preserve. This process is on-going and will be completed following the NEPA decision document. To view copies of the letters/emails referenced above between VDOT and the FCPA see Appendix B.



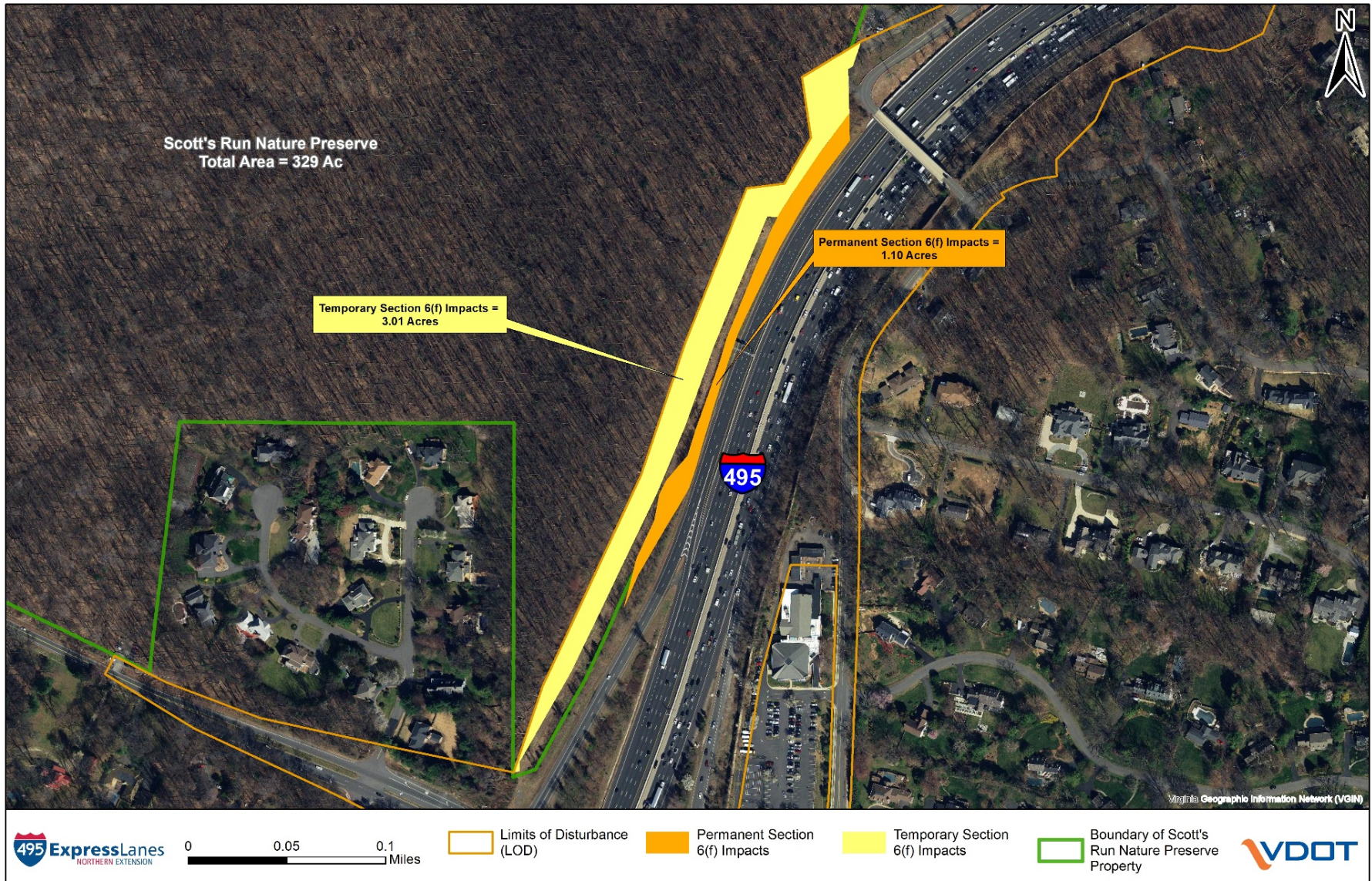


Figure 4-1. Section 6(f) Impacts Related to Scott's Run Nature Preserve



## 5.0 REFERENCES

- 16 U.S.C. 460(I)(8)(f). Section 6(f) of Land and Water Conservation Fund Act of 1965, as amended.
- 49 U.S.C. 303(c). Section 4(f) of the U.S. Department of Transportation Act of 1966, as amended.
- 23 CFR Part 771.135. Environmental Impact and Related Procedures: Section 4(f) (49 U.S.C. 303).  
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- National Park Service (NPS). 2019. Nature & Science. Last Accessed: February 2020.  
<https://www.nps.gov/gwmp/learn/nature/index.htm>
- National Park Service (NPS). 2015. Outdoor Activities. Last Accessed: February 2020.  
<https://www.nps.gov/gwmp/planyourvisit/outdooractivities.htm>
- The Nature Conservancy. 2005. *Discover the Potomac Gorge: A National Treasure*. Accessed December 2020: [https://www.nature.org/media/maryland/finalpogobrochure\\_back\\_low\\_rez.pdf](https://www.nature.org/media/maryland/finalpogobrochure_back_low_rez.pdf)
- Virginia Department of Transportation (VDOT). (2020a). *I-495 Alternatives Development Technical Memorandum*.



Virginia Department of Transportation (VDOT). (2020b). *I-495 Traffic and Transportation Technical Report*.

**APPENDIX A**

**George Washington Memorial Parkway Visualizations Booklet  
(February 6, 2020)**

*- Attached by reference as a separate volume -*

**APPENDIX B**  
**Coordination**





## COMMONWEALTH *of* VIRGINIA

DEPARTMENT OF TRANSPORTATION  
1401 EAST BROAD STREET  
RICHMOND, VIRGINIA 23219-2000

Stephen C. Brich, P.E.  
COMMISSIONER

March 17, 2020

ROUTE: I-495  
PROJECT: 0495-029-419, PLOI; UPC: 113414  
COUNTY/CITY: Fairfax County  
FUNDING: Federal  
VDHRFILE: 2018-0473  
ACTION REQUIRED: Determination of Effect

Ms. Julie V. Langan, Director  
Attn.: Mr. Marc Holma, Office of Review and  
Compliance Virginia Department of Historic Resources  
2801 Kensington Avenue  
Richmond, VA 23221

Dear Mr. Holma:

The Virginia Department of Transportation (VDOT) is studying proposed improvements to I-495 between Dulles Toll Road (Route 267) and the George Washington Memorial Parkway interchange in the vicinity of the American Legion Bridge. On behalf of the Federal Highway Administration (FHWA), VDOT has coordinated this federally-funded project, called the I-495 NEXT project, with the Virginia Department of Historic Resources (VDHR/Virginia SHPO) since 2018 in accordance with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended, and its implementing regulations, 36 CFR Part 800. Current design plans indicate that the proposed project has been revised to include additional improvements that extend beyond the limits of the APE as it was originally defined. **The purpose of this letter is to coordinate an effect determination for cultural resources that fall within the project's revised Area of Potential Effects (APE).**

VDOT maintains that cultural resource work completed for this project meets the standards set forth in both the Secretary of Interior's Standards and Guidelines (1983) and the VDHR Guidelines for Conducting Historic Resource Surveys in Virginia (May 2011) with reference to the *Programmatic Agreement among the Federal Highway Administration, the U.S. Army Corps*

Page 2 of 7

**Marc Holma**

**17 March 2020**

*of Engineers, Norfolk District, the Tennessee Valley Authority, the Advisory Council on Historic Preservation, the Virginia State Historic Preservation Office and the Virginia Department of Transportation Regarding Transportation Undertakings Subject to Section 106 of the National Historic Preservation Act of 1966, executed August 2, 2016 (2016 Federal PA).*

### **Project Overview**

VDOT, in coordination with the Federal Highway Administration (FHWA) as the lead federal agency, is preparing an Environmental Assessment (EA) for the proposed project. The study will evaluate the potential extension of the existing High Occupancy Toll (HOT) lanes from their current northern terminus at the Dulles Toll Road (Route 267) to the George Washington Memorial Parkway interchange in the vicinity of the American Legion Bridge.<sup>1</sup> The extension of HOT lanes are primarily located within existing right-of-way (ROW). The purpose for the study focuses on reducing congestion, providing additional travel choices, and improving travel reliability. The APE for archaeological resources is defined by the project's limits of disturbance (LOD); the APE for architectural resources includes the vicinity where alterations to historic feeling and setting may occur.

Cultural Heritage Group (CHG) conducted cultural resources survey of the vast majority of the APE for this project in April 2019 and May 2019. On July 30, 2019, VDOT coordinated with your office the results of this initial survey, as well as the eligibility of architectural resources located within the entire APE and the eligibility of archaeological resources located within portions of the APE that fall outside the boundaries of the GWMP. VDHR concurred with the findings of this study on August 14, 2019.

As you are aware, the I-495 NEXT project is contiguous with the I-495 & I-270 Managed Lanes Study (MLS) in Maryland. On behalf of the Maryland State Highway Administration (MSHA) and VDOT, TRC Environmental Group (TRC) conducted archaeological survey of the portions of the MLS and the portions of the I-495 NEXT projects that fall within the GWMP from July 8-17, 2019. These survey efforts were combined to more efficiently identify archaeological resources under a single permit (19-GWMP-5), which is required under the Archeological Resources Protection Act (ARPA) to conduct archaeological excavations on federal land. VDOT coordinated the results of the TRC survey with VDHR on October 30, 2019, and VDHR concurred with the findings on November 20, 2019.

### **Revised Project Area of Potential Effects**

Design of the proposed I-495 NEXT project was revised in January 2020 to include additional improvements to the I-495/Dulles Road (Route 267), I-495/Chain Bridge Road (Route 123), Dulles Road (Route 267)/Chain Bridge Road (Route 123), and I-495/GWMP interchanges. The APE for the revised I-495 NEXT project is consistent with what was previously coordinated with your agency. The APE for archaeological resources, direct effects APE, is defined by the project's limits of disturbance (LOD). The architecture APE, indirect effects, is the vicinity where

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<sup>1</sup> The project is administered as a Public-Private Partnership (P-3) between VDOT and a P-3 concessionaire. The concessionaire will be responsible for constructing the project and procuring a design-builder. VDOT shall ensure that the Section 106 commitments identified in this letter are carried out by the concessionaire through VDOT's review and concurrence responsibilities in its partnership with the concessionaire.

Page 3 of 7  
**Marc Holma**  
**17 March 2020**

alterations to feeling and setting may occur (Figure 1).

The expanded portions of the APE that are located within the GWMP were surveyed by TRC in 2019, and no archaeological resources were identified. The remaining portions of the expanded APE for archaeological resources are characterized either by previously modified ground or by excessive slopes (Figure 2). Therefore, no further archaeological survey is warranted.

There is one previously identified architectural resource within the revised APE for the project. The Tysons Corner Mall (VDHR No. 029-6464) was surveyed in 2019, but has not yet been evaluated for eligibility to the NRHP. No new architectural resources over 50 years of age were surveyed within the revised APE.

**Previously Identified Architectural Resources in Revised APE**

<b>VDHR Resource Number</b>	<b>Resource</b>	<b>Eligibility Recommendation</b>
029-6464	Tysons Corner Mall	Not Evaluated

**Assessment of Effect**

*Architecture*

Based on current design, only one historic property, the George Washington Memorial Parkway (GWMP) (VDHR No. 029-0228), falls within the project APE that will be affected. The Georgetown Pike (VDHR No. 029-0466) is in the vicinity of the APE; however the 0.53 mile section at the I-495 Interchange does not contribute to and is not included within the NRHP listed portion of the Georgetown Pike. The Tysons Corner Mall (VDHR No. 029-6464) does fall within the APE for indirect effects. However, the proposed project will not directly impact Tysons Corner Mall, nor will it alter the existing feeling and setting of the resource. Therefore, VDOT maintains that the proposed project will have no effect on the Tysons Corner Mall.

With regard to the GWMP, VDOT’s assessment of effect has been informed by two documents: the NRHP nomination for the GWMP prepared by the NPS in 1995 and the Cultural Landscape Inventory (CLI) for the North Parkway published by the NPS in 2009. The NRHP nomination specifically excludes the I-495/GWMP interchange from the defined historic property, and most project elements are located within that excluded interchange. In addition, the CLI identifies certain aspects of the North Parkway that are important landscape elements including views of the Potomac Palisades, stone walls, the tree canopy and the configuration of the Parkway itself. Of those elements, only the tree canopy and the Parkway’s configuration are within the project’s APE. Alteration of the canopy will occur only as a result of the four gateway options in an area that had minimal forest cover during the GWMP’s period of significance defined in the NRHP nomination (see Attachment: *Visualizations* Booklet, page 8).<sup>2</sup> Further, the overall configuration of the Parkway itself will be altered only by extending the existing merge taper for a distance of approximately 1150 feet within the NRHP boundaries of the GWMP. It is VDOT’s opinion that neither of these alterations to character-defining features of the GWMP rise to the level of

<sup>2</sup> The *Visualizations* Booklet, dated February 6, 2020, is an Attachment to this letter by reference. It was distributed to all the consulting parties and is not physically attached. If additional copies are needed, please contact VDOT.



Page 4 of 7

**Marc Holma**

**17 March 2020**

diminishing those features.

#### *Archaeology*

Although the proposed Dead Run Ridges Archaeological District is located within the APE for archaeological resources, the APE does not extend within any of the archaeological resources that may contribute to the NRHP eligibility of a proposed district, and no other archaeological sites eligible for or listed on the NRHP are located within the APE for archaeological resources (Figure 3). Three NRHP-eligible archaeological sites (44FX0374, 44FX0379, and 44FX0389) and one unevaluated archaeological site (44FX2430), however, are located immediately adjacent to the Project LOD.

#### *Proposed Design*

The VDOT design team worked closely with the NPS and consulting parties in order to develop a project that considers the setting and feeling of the GWMP. The goal behind the design is to minimize the visual and physical impact to the GWMP, while incorporating elements of design that creates a gateway entrance to the GWMP off I-495. Early in the Section 106 process, the NPS stated that a design clearly identifying the GWMP to drivers exiting I-495 was preferred. To meet this request, the design consultant presented a *Visualizations* booklet (the Booklet) at the February 6, 2020 consulting parties meeting (a copy of the Booklet is included with this correspondence). The Booklet presents a design concept that addresses the NPS's desire for a clear gateway to the GWMP, proposed directional signage to I-495 from the GWMP, and the merging of the express lanes and general purpose lanes from I-495 from the south onto the GWMP. VDOT maintains that the design options presented in the Booklet minimize the effect of the I-495 NEXT project to the GWMP. While the proposed project may alter the setting and feeling of the GWMP, the project does not diminish any aspects of integrity that contribute to the significance of the resource.

#### Gateway Options

The Booklet outlines four gateway options for traffic traveling from the express lanes and general purpose lanes from I-495 onto the GWMP. Three of the options involve the construction of a stone-faced retaining wall, while one option proposes an alteration by laying back the slope to the south of the GWMP. Currently, the NPS is deliberating as to which option from the Booklet is preferred. Regardless of the option chosen, VDOT shall commit to the following conditions. The retaining wall offered in design options two, three, and four will be to NPS design standards and specifications. The landscaping completed for the project shall also meet NPS standards and specifications, as well as incorporating the results of the tree survey already completed for this project. VDOT shall consult with the NPS and consulting parties to ensure that the NPS-selected gateway design concept will avoid any adverse effects to the GWMP. VDOT shall develop a major milestones design review schedule in consultation with the Virginia SHPO, the NPS and other consulting parties. The major milestones design review schedule shall include at least two interim submissions for review.

Page 5 of 7

**Marc Holma**

**17 March 2020**

Signage

New sign placement, size, font, support color, and design shall be consistent with those proposed in the Booklet. In addition, VDOT shall place brown, NPS signs along I-495 identifying the GWMP as a NPS park unit. VDOT shall consult with the Virginia SHPO, the NPS and other consulting parties should sign placement as depicted in the Booklet need to be modified as project design progresses and to avoid adverse effects.

Roadway

The tie-in from I-495 northbound to GWMP is generally consistent with the existing roadway configuration; however, the proposed design improves the acceleration lane from I-495 North by extending the merge from three to two lanes approximately 1,200 feet further east along GWMP. VDOT shall provide NPS and consulting parties, a major milestone design and review schedule. The design-builder will be responsible for obtaining all necessary permits from GWMP and as part of their submittal, shall provide GWMP with a pavement design, along with supporting geotechnical information that will include mill and overlay no further than the western abutment of Dead Run Bridge. Other improvements along this section will include the reconstruction of curb along eastbound GWMP.

Archaeology

To avoid any impacts to the portions of 44FX0374, 44FX0379, 44FX0389, and 44FX2430 that lie adjacent to the current LOD, VDOT shall ensure that design constraints are included in the Request for Proposals requiring the design-builder to remain within the current LOD where possible in designing and constructing project improvements in the vicinity of each of these resources. VDOT shall also require the design-builder to erect safety fence along the LOD to ensure avoidance of any ground disturbance to 44FX0374, 44FX0379, 44FX0389, or 44FX2430 during construction of the project, or by construction vehicles entering and leaving the project corridor, and will ensure that the Design-Build contract includes a Special Provision requiring installation of the safety fence. VDOT shall consult with the Virginia SHPO and other consulting parties should the LOD be modified with regard to additional archaeological survey needs and to avoid adverse effects.

**Determination of Effect**

The implementing regulations of Section 106 of the NHPA define an effect as an “alteration to the characteristics of a historic property qualifying it for inclusion in or eligible for the National Register” [36CFR800.16 (i)]. The effect is adverse only when the alteration of a qualifying characteristic occurs in a “manner that would diminish the integrity of the property’s location, design, setting, materials, workmanship, feeling, or association” [36CFR800.5 (a)]. VDOT Cultural Resources staff have reviewed the plans for this project, which reflect VDOT’s concerted efforts to minimize and avoid impacts to historic properties, as documented in part by the Booklet, and have determined that the project as proposed will alter but not diminish the integrity of historic properties within the project’s APE. As such, VDOT has determined that the revised design of the I-495 NEXT Project will have No Adverse Effect on historic properties in accordance with 36 CFR 800.5(b), provided that conditions are imposed and implemented to avoid adverse effects on the GWMP (VDHR No.: 029-0228) and Archaeological Sites 44FX0374, 44FX0379, 44FX0389, and 44FX2430 (see discussion above and concurrence page).

Page 6 of 7

**Marc Holma**

**17 March 2020**

VDOT looks forward to receiving any comments you or other consulting parties may have about these findings. We ask that comments be provided within 30 days of receipt of this letter. If the Virginia SHPO concurs with VDOT's findings, we invite you to complete the signature block below and return it to my attention. Please know that VDOT intends to use your concurrence of this finding to support the Federal Highway Administration (FHWA) in making a *de minimis* determination pursuant to Section 4(f) of the Department of Transportation Act. Please contact Sarah at (804) 371-6710, [Sarah.Clarke@VDOT.virginia.gov](mailto:Sarah.Clarke@VDOT.virginia.gov), or Will at (804) 786-2852, [William.Moore@VDOT.virginia.gov](mailto:William.Moore@VDOT.virginia.gov), if you have questions about this project.

Sincerely,



Sarah M. Clarke  
Environmental Program Planner  
Cultural Resources



William H. Moore  
Environmental Program Planner  
Cultural Resources

- c. Fairfax County History Commission  
Tammy Stidham, National Park Service, National Capital Region  
Charles Cuvelier, Superintendent, George Washington Memorial Parkway  
Maureen Joseph, George Washington Memorial Parkway  
Steve Archer, Maryland State Highway



Page 7 of 7

**Marc Holma**

**17 March 2020**

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The Virginia Department of Historic Resources (VDHR) concurs with the Virginia Department of Transportation (VDOT) that:

- No further cultural resources survey is warranted at this time. VDOT shall monitor design efforts and consult with the Virginia SHPO and other consulting parties should additional survey efforts be necessary.
- The project as proposed will have No Adverse Effect on historic properties, provided the following conditions to avoid adverse effects are implemented:
  - VDOT shall include design constraints in the Request for Proposals requiring the design-builder to remain within the current LOD where possible in designing and constructing project improvements in the vicinity of 44FX0374, 44FX0379, 44FX0389, and 44FX2430. VDOT shall ensure that safety fencing is erected along the LOD to ensure avoidance of any ground disturbance to 44FX0374, 44FX0379, 44FX0389, or 44FX2430 during construction of the project, or by construction vehicles entering and leaving the project corridor. VDOT shall include a Special Provision requiring installation of the safety fence in contract with the design-builder.
  - VDOT shall implement a “gateway” option selected by the GWMP in a manner generally consistent with the visualizations for that option depicted in the Booklet dated February 6, 2020 and in continuing consultation with the GWMP and the Virginia SHPO. VDOT shall construct any infrastructure such as retaining walls associated with the NPS-selected gateway option in accordance with NPS specifications.
  - VDOT shall install any necessary plantings on NPS lands associated with the NPS-selected gateway option in accordance with NPS specifications.
  - VDOT shall install signing for its I-495 NEXT project in accordance with the signing visualizations depicted in the Booklet dated February 6, 2020 and in continuing consultation with the GWMP and the Virginia SHPO.
  - VDOT shall construct the connection between I-495 and the GWMP in accordance with the visualizations depicted in the Booklet dated February 6, 2020 and in continuing consultation with the GWMP and the Virginia SHPO.
  - VDOT shall consult with the GWMP and the Virginia SHPO at major milestones in project design to ensure the design remains consistent with these conditions to avoid adverse effects on the GWMP.

For VDOT Project No. 0495-029-419, P101; UPC: 113414; VDHR File No.: 2018-0473.

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Julie V. Langan  
Director, Virginia Department of Historic Resources  
Virginia State Historic Preservation Officer

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Date



## COMMONWEALTH of VIRGINIA

### Department of Historic Resources

Matt Strickler  
Secretary of Natural Resources

2801 Kensington Avenue, Richmond, Virginia 23221

Julie V. Langan  
Director

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7 April 2020

Ms Sarah M. Clarke  
Department of Transportation  
1401 East Broad Street  
Richmond, Virginia 23219-2000

Re: I-495 Express Lanes Northern Extension (I-495 NEXT)—Effect Determination  
Fairfax County  
DHR File # 2018-0473

Dear Ms Clarke:

The Department of Historic Resources (DHR) has received your letter of 17 March 2020 regarding the above referenced project. The Virginia Department of Transportation (VDOT) requests our review and comment on the potential for the proposed I-495 Express Lanes Northern Expansion (I-495 NEXT) project to affect historic properties listed in or eligible for listing in the National Register of Historic Places (NRHP). Cultural resources surveys conducted for VDOT and the Maryland State Highway Administration (MSHA) identified three architectural properties within the Area of Potential Effects (ADP) and four archaeological sites adjacent to the limits of disturbance (LOD).

Based on the current design, the only historic property located within the APE which may be affected by the undertaking is the George Washington Memorial Parkway (DHR Inventory No. 029-0228), a property listed in the NRHP. Two other architectural properties, the Georgetown Pike (DHR Inventory No. 029-0466) and Tysons Corner Mall (DHR Inventory 029-6464) are also located within the APE. However, the section 0.53-mile section of the NRHP-listed Georgetown Pike in the APE does not contribute to the historic resource. The Tysons Corner Mall, although included within an expanded APE for indirect effects, is sufficiently physically distant from the undertaking as not to diminish any qualities that may contribute to the historic character of the resource.

As discussed during a 6 February 2020 conference call, VDOT has prepared four design options, which it provided to the National Park Service (NPS) for its consideration as to which it would prefer going forward to construction. All the options under consideration will have impacts to the George Washington Memorial Parkway (GWMP) in some degree; however, it is DHR's opinion that Option 1 will have the least effect on

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Richmond, VA 23221  
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Western Region Office  
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5357 Main Street  
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Tel: (540) 868-7029  
Fax: (540) 868-7033


Page 1  
7 April 2020  
Ms Sarah M. Clarke

the historic property. Unlike the other three options, Option 1 does not introduce into the historic landscape modern intrusions in the form of retaining walls. Further, although Option 1 will require grading a portion of the existing slope and removal of some vegetation, VDOT has committed to replanting native trees species in the cleared LOD. Aerial photographs showing this section of the GWMP in 1967 demonstrate the existing vegetation does not date to the period of significance and that whatever trees and plants VDOT removes will soon reconstitute naturally. Once revegetation occurs in the project's LOD, there will be little visible differentiation between the GWMP's appearance today and after project construction. The same cannot be said for Options 2 through 4, which will result in permanent and obtrusive stonewalls on the historic landscape.

Please consult with DHR on project effect once NPS has indicated its preferred option.

If you have any questions regarding our comments, please call me at (804) 482-6090.

Sincerely,



Marc Holma, Architectural Historian  
Division of Review and Compliance

C: Mr. Charles Cuvelier, NPS, Superintendent, George Washington Memorial Parkway  
Ms. Maureen Joseph, NPS, George Washington Memorial Parkway  
Ms Tammy Stidham, NPS, National Capital Region  
Mr. Steve Archer, Maryland State Highway  
Mr. Tony Opperman, VDOT  
Mr. William H. Moore, VDOT





**COMMONWEALTH of VIRGINIA**

**Department of Historic Resources**

2801 Kensington Avenue, Richmond, Virginia 23221

Matt Strickler  
Secretary of Natural Resources

Julie V. Langan  
Director

Tel: (804) 367-2323  
Fax: (804) 367-2391  
www.dhr.virginia.gov

8 April 2020


Ms Sarah M. Clarke  
Department of Transportation  
1401 East Broad Street  
Richmond, Virginia 23219-2000

Re: I-495 Express Lanes Northern Extension (I-495 NEXT)—Effect Determination  
Fairfax County  
DHR File # 2018-0473

Dear Ms Clarke:

The Department of Historic Resources (DHR) submits this letter at the request of the Virginia Department of Transportation (VDOT) to expand upon our position related to the possible effects on historic properties within the project Area of Potential Effects resulting from the selection of Option 1 as the preferred alternative for the above referenced undertaking. As stated in our letter dated 7 April 2020 the DHR believes of the four alternatives presented, Option 1 as presently envisioned will have the least impact upon the George Washington Memorial Parkway (GWMP), a property listed in the National Register of Historic Places. We further believe that if the National Park Service selects Option 1 to move forward to construction, the undertaking will have No Adverse Effect on the GWMP. However, if another one of the four proposed options is selected additional consultation with DHR on project effect will be necessary.

If you have any questions regarding our comments, please call me at (804) 482-6090.

Sincerely,  
  
Marc Holma, Architectural Historian  
Division of Review and Compliance

Administrative Services  
10 Courthouse Ave.  
Petersburg, VA 23803  
Tel: (804) 862-6408  
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C: Mr. Charles Cuvelier, NPS, Superintendent, George Washington Memorial Parkway  
Ms. Maureen Joseph, NPS, George Washington Memorial Parkway  
Ms Tammy Stidham, NPS, National Capital Region  
Mr. Steve Archer, Maryland State Highway  
Mr. Tony Opperman, VDOT  
Mr. William H. Moore, VDOT



IN REPLY REFER TO:

## United States Department of the Interior

NATIONAL PARK SERVICE  
George Washington Memorial Parkway  
700 George Washington Memorial Parkway  
McLean, VA 22101



### 1.A.1 (GWMP)

Ms. Sarah M. Clarke  
Environmental Program Planner  
Commonwealth of Virginia  
Department of Transportation  
1401 East Broad Street  
Richmond, Virginia 23219-2000

Dear Ms. Clarke:

We are writing in reference to your March 17, 2020, Determination of Effect letter to the Virginia Department of Historic Resources (VDHR) regarding the Virginia Department of Transportation (VDOT) proposed project to improve the I-495 corridor between the Dulles Toll Road and the George Washington Memorial Parkway interchange in the vicinity of the American Legion Bridge (I-495 NEXT). In this letter VDOT requested VDHR's review and concurrence to a No Adverse Effect determination for impacts on historic properties that fall within the project's revised Area of Potential Effect (APE) related to the I-495 NEXT project in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended. The National Park Service (NPS) serves as a consulting party for this project due to the effects of the project on the George Washington Memorial Parkway (GWMP) and was copied on this letter.

The NPS has reviewed the project based on the information that was provided during a February 6, 2020, meeting and represented in a Visualizations Booklet with updated content provided on February 25, 2020. The NPS concurs with VDOT's No Adverse Effect determination for the I-495 NEXT project provided that VDOT selects design option 1 (no retaining wall on NPS property), further minimizes the loss of forest, and mitigates the loss of forest. While option 1 provides the best solution to eliminating the introduction of new infrastructure design elements on NPS lands, option 1 has the greatest effect on the mature forest canopy, understory, and herbaceous plant community. The forest is a character defining feature for the GWMP, and the loss may never fully recover due to present day influences of invasive vegetation, difficulty in adapting to climate change, and lack of ecosystem resiliency even after replanting efforts. To minimize the loss of forest at this entrance to the GWMP, NPS would like VDOT to the extent possible reduce forest loss on their property as well as consider a different treatment of the walls on VDOT property. This would further diminish the effects of the project within this area, develop a harmonious transition of wall/barrier types complementary to the GWMP, and provide an appropriate entry experience for drivers approaching the Parkway from the Beltway.

The NPS will provide further comment on the project through our review of the Environmental Assessment (EA) which is currently out for public review. We are very interested in what VDOT hears from the public regarding the alternatives that are included in the EA. Since the current COVID-19 pandemic has extended VDOT's process we look forward to hearing VDOT's plan to engage the public and further refine alternatives.

We look forward to working with you and the rest of the VDOT team in refining the design to minimize and mitigate the impacts to the Parkway's historic landscape as this project progresses. If you have any questions or need additional information, you can contact either Matthew Virta, Cultural Resources



Program Manager via email at [matthew\\_virta@nps.gov](mailto:matthew_virta@nps.gov) or phone at 202-439-7323 or Maureen Joseph, Chief of Resource Management, via email at [maureen\\_joseph@nps.gov](mailto:maureen_joseph@nps.gov) or phone 202-734-0932.

Sincerely,

**Charles** Date:  
2020.04.29  
**Cuvelier** 08:30:23  
-04'00'  
Charles Cuvelier  
Superintendent

cc:  
VDOT – W. Moore  
VDOT – A. Lerner  
MD-SHA – S. Archer  
VA-DHR – M. Holma  
NPS-NCA - T. Stidham  
NPS-GWMP – M. Joseph



## United States Department of the Interior

NATIONAL PARK SERVICE  
George Washington Memorial Parkway  
c/o Turkey Run Park  
McLean, Virginia 22101

IN REPLY REFER TO:

C3821 (3301)

October 5, 2020

Abi Learner, P.E.  
VDOT Northern Virginia District Office  
4975 Alliance Drive  
Fairfax, VA 22030

Re: NPS Comments on 495 Express Lanes Northern Extension Project Environmental Assessment

Dear Mr. Lerner,

The National Park Service (NPS) has reviewed the Virginia Department of Transportation (VDOT) I-495 Express Lanes Northern Extension Environmental Assessment (EA), which evaluates an extension of the Interstate 495 (I-495) Express Lanes along approximately three miles of I-495, also referred to as the Capital Beltway, from their current northern terminus in the vicinity of the Old Dominion Drive overpass to the George Washington Memorial Parkway (Parkway) in the McLean area of Fairfax County, Virginia. The purpose of the project is to reduce congestion, provide additional travel choices and improve travel reliability by extending the I-495 Express Lanes from the existing terminus of the I-495 Express Lanes to the Parkway interchange in the vicinity of the American Legion Bridge. The proposed improvements entail new and reconfigured express lane ramps and general-purpose lane ramps at the Dulles Interchange and tie-in connections to the Route 123/I-495 interchange. Because of the project's impacts to the Parkway, the NPS is serving as a cooperating agency on this project and has been coordinating with VDOT and offers the following general comments with detailed comments attached.

The Build alternative includes modifications to the I-495/Parkway interchange to allow for express lane access from I-495 to and from the Parkway. VDOT will need to acquire use of NPS property through Highway Easement Deed (HED). The amount of area required is yet to be determined and will necessitate a survey prior to the completion of the EA decision document and Final Section 4(f) Evaluation. The area from which the easement would be acquired abuts the existing GWMP eastbound lanes and incorporates the removal of vegetation necessary for the construction of the tie-in and fly-over ramps (located outside the GWMP boundary) associated with the I-495 NEXT Project. Additionally, in various locations along the existing GWMP, VDOT proposes to add new express lane tolling signage. VDOT has determined that the Build Alternative would require the permanent and temporary use of land from the Parkway and has proposed the impacts under Section 4(f) (23 CFR 774.17) as de minimis. At this time, the NPS cannot concur as this does not constitute a final determination by VDOT. The Final Section

4(f) Evaluation will need to be submitted to the Department of Interior for review once a final determination has been made.

The VDOT has determined under Section 106 of the National Historic Preservation Act a determination of No Adverse Effect with the concurrence of the Virginia State Historic Preservation Officer. The NPS concurred with VDOT's No Adverse Effect determination for the project in correspondence on April 29, 2020, provided that VDOT selected design option 1 (no retaining wall on NPS property), and further minimizes the loss of forest, and mitigates the loss of forest. While option 1 provides the best solution to eliminating the introduction of new infrastructure design elements on NPS lands, option 1 has the greatest effect on mature forest canopy understory, and herbaceous plant community. Vistas and viewsheds are among the most significant features of the Parkway, framed by mature forest canopy understory, and herbaceous plant community. The forest is a character defining feature for the Parkway and the loss may never fully recover due to present day influences of invasive vegetation, difficulty in adapting to climate change, and lack of ecosystem resiliency even after replanting efforts. To further minimize the loss of forest at this entrance to the Parkway, the NPS would like VDOT to explore reducing the forest loss on their property. In addition, the NPS recommends a different wall treatment on VDOT property, which complements the Parkway architecture. These two changes would create an appropriate entry experience for drivers approaching the Parkway from the Beltway and would protect the character of this historic resource.

We appreciate the on-going coordination with the VDOT project team. This collaboration has led to a significant reduction in impacts to the Parkway from the original alternatives explored. This process should continue as the design progresses and through the completion of the EA to further avoid and minimize impacts to the Parkway. This project will require the NPS to issue a permit and to work with VDOT and Federal Highway Administration in the development of a HED. These actions will require the NPS to adopt this EA and develop a NPS Finding of No Significant Impact.

We look forward to our work with the VDOT team in continuing to refine the design to further minimize and mitigate the impacts to the Parkway's historic landscape as this project progresses. If you have any questions or need additional information, you can contact Maureen Joseph, GWMP Chief of Resource Management, at [maureen\\_joseph@nps.gov](mailto:maureen_joseph@nps.gov) or 202-734-0932.

Sincerely,

Charles Cuvelier  
Date: 2020.10.05 13:31:49 -04'00'

Charles Cuvelier  
Superintendent

Attachment: NPS Comments on EA





## COMMONWEALTH of VIRGINIA

DEPARTMENT OF TRANSPORTATION  
1401 EAST BROAD STREET  
RICHMOND, VIRGINIA 23219-2000

Stephen C. Brich, P.E.  
COMMISSIONER

January 14, 2021

ROUTE: I-495  
PROJECT: 0495-029-419, PI01; UPC: 113414  
COUNTY/CITY: Fairfax County  
FUNDING: Federal  
VDHRFILE: 2018-0473  
ACTION REQUIRED: Determination of Effect

Ms. Julie V. Langan, Director  
Attn.: Mr. Marc Holma, Office of Review and  
Compliance Virginia Department of Historic Resources  
2801 Kensington Avenue  
Richmond, VA 23221

Dear Mr. Holma:

The Virginia Department of Transportation (VDOT) is studying proposed improvements to I-495 between Dulles Toll Road (Route 267) and the George Washington Memorial Parkway interchange in the vicinity of the American Legion Bridge. On behalf of the Federal Highway Administration (FHWA), VDOT has coordinated this federally-funded project, called the I-495 NEXT project, with the Virginia Department of Historic Resources (VDHR/Virginia SHPO) since 2018 in accordance with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended, and its implementing regulations, 36 CFR Part 800. Current design plans indicate that the proposed project has been revised to include additional improvements that extend beyond the limits of the APE as it was originally defined. **The purpose of this letter is to coordinate an effect determination for the cultural resources that fall within the revised Area of Potential Effect (APE) for the I-495 NEXT project.**

VDOT maintains that cultural resource work completed for this project meets the standards set forth in both the Secretary of Interior's Standards and Guidelines (1983) and the VDHR Guidelines for Conducting Historic Resource Surveys in Virginia (May 2011) with reference to the *Programmatic Agreement among the Federal Highway Administration, the U.S. Army Corps*

Page 2 of 7

**Marc Holma**

**14 January 2021**

*of Engineers, Norfolk District, the Tennessee Valley Authority, the Advisory Council on Historic Preservation, the Virginia State Historic Preservation Office and the Virginia Department of Transportation Regarding Transportation Undertakings Subject to Section 106 of the National Historic Preservation Act of 1966, executed August 2, 2016 (2016 Federal PA).*

### **Project Overview**

VDOT, in coordination with the Federal Highway Administration (FHWA) as the lead federal agency, is preparing an Environmental Assessment (EA) for the proposed project. The study will evaluate the potential extension of the existing High Occupancy Toll (HOT) lanes from their current northern terminus at the Dulles Toll Road (Route 267) to the George Washington Memorial Parkway interchange in the vicinity of the American Legion Bridge.<sup>1</sup> The extension of HOT lanes are primarily located within existing right-of-way (ROW). The purpose for the study focuses on reducing congestion, providing additional travel choices, and improving travel reliability. The APE for archaeological resources is defined by the project's limits of disturbance (LOD); the APE for architectural resources includes the vicinity where alterations to historic feeling and setting may occur.

Cultural Heritage Group (CHG) conducted cultural resources survey of the vast majority of the APE for this project in April 2019 and May 2019. On July 30, 2019, VDOT coordinated with your office the results of this initial survey, as well as the eligibility of architectural resources located within the entire APE and the eligibility of archaeological resources located within portions of the APE that fall outside the boundaries of the GWMP. VDHR concurred with the findings of this study on August 14, 2019.

As you are aware, the I-495 NEXT project is contiguous with the I-495 & I-270 Managed Lanes Study (MLS) in Maryland. On behalf of the Maryland State Highway Administration (MSHA) and VDOT, TRC Environmental Group (TRC) conducted archaeological survey of the portions of the MLS and the portions of the I-495 NEXT projects that fall within the GWMP from July 8-17, 2019. These survey efforts were combined to more efficiently identify archaeological resources under a single permit (19-GWMP-5), which is required under the Archeological Resources Protection Act (ARPA) to conduct archaeological excavations on federal land. VDOT coordinated the results of the TRC survey with VDHR on October 30, 2019, and VDHR concurred with the findings on November 20, 2019. Since the initial coordination, the MSHA requested that the NPS comment on the eligibility of the Deep Run Ridges Archaeological Historic District. In September 2020, the NPS concurred with the MSHA that Archaeological Sites 44FX0374, 44FX0381, and 44FX0389 are contributing sites to the Dead Run Ridges Archaeological Historic District (44FX3922).

### **Assessment of Effect**

#### *Architecture*

Based on current design, only one architectural historic property, the George Washington

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<sup>1</sup> The project is administered as a Public-Private Partnership (P-3) between VDOT and a P-3 concessionaire. The concessionaire will be responsible for constructing the project and procuring a design-builder. VDOT shall ensure that the Section 106 commitments identified in this letter are carried out by the concessionaire through VDOT's review and concurrence responsibilities in its partnership with the concessionaire.

Page 3 of 7

**Marc Holma**

**14 January 2021**

Memorial Parkway (GWMP) (VDHR No. 029-0228), falls within the project APE. The Georgetown Pike (VDHR No. 029-0466) is in the vicinity of the APE; however the 0.53 mile section at the I-495 Interchange does not contribute to and is not included within the NRHP listed portion of the Georgetown Pike. The Tysons Corner Mall (VDHR No. 029-6464) does fall within the APE for indirect effects. However, the proposed project will not directly impact Tysons Corner Mall, nor will it alter the existing feeling and setting of the resource. Therefore, VDOT maintains that the proposed project will have no effect on the Tysons Corner Mall.

With regard to the GWMP, VDOT's assessment of effect has been informed by two documents: the NRHP nomination for the GWMP prepared by the NPS in 1995 and the Cultural Landscape Inventory (CLI) for the North Parkway published by the NPS in 2009. The NRHP nomination specifically excludes the I-495/GWMP interchange from the defined historic property, and most project elements are located within that excluded interchange. In addition, the CLI identifies certain aspects of the North Parkway that are important landscape elements including views of the Potomac Palisades, stone walls, the tree canopy and the configuration of the Parkway itself. Of those elements, only the tree canopy and the Parkway's configuration are within the project's APE. Alteration of the canopy will occur only as a result of the four gateway options in an area that had minimal forest cover during the GWMP's period of significance defined in the NRHP nomination (see Attachment: *George Washington Memorial Parkway Visualization Booklet*, page 8).<sup>2</sup> Further, the overall configuration of the Parkway itself will be altered only by extending the existing merge taper for a distance of approximately 1150 feet within the NRHP boundaries of the GWMP. It is VDOT's opinion that neither of these alterations to character-defining features of the GWMP rise to the level of diminishing those features.

#### *Archaeology*

Although the Dead Run Ridges Archaeological District (44FX3922) is located within the APE for archaeological resources, the APE does not extend within any of the archaeological resources that contribute to the NRHP eligibility of the district, and no other archaeological sites eligible for or listed on the NRHP are located within the APE for archaeological resources (Figure 3). Three NRHP-eligible archaeological sites (44FX0374, 44FX0379, and 44FX0389) and one unevaluated archaeological site (44FX2430), however, are located immediately adjacent to the Project LOD.

#### *Proposed Design*

The VDOT design team worked closely with the NPS and consulting parties in order to develop a project that considers the setting and feeling of the GWMP. The goal behind the design is to minimize the visual and physical impact to the GWMP, while incorporating elements of design that creates a gateway entrance to the GWMP off I-495. Early in the Section 106 process, the NPS stated that a design clearly identifying the GWMP to drivers exiting I-495 was preferred. To meet this request, the design consultant presented a *George Washington Memorial Parkway Visualization Booklet* (the Booklet) at the February 6, 2020 consulting parties meeting (a copy of the Booklet is included with this correspondence). The Booklet presents a design concept that addresses the NPS's desire for a clear gateway to the GWMP, proposed directional signage to I-

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<sup>2</sup> The *Visualization Booklet*, dated February 6, 2020, is an Attachment to this letter by reference. It was distributed to all the consulting parties and is not physically attached. If additional copies are needed, please contact VDOT.



Page 4 of 7

**Marc Holma**

**14 January 2021**

495 from the GWMP, and the merging of the express lanes and general purpose lanes from I-495 from the south onto the GWMP. VDOT maintains that the design options presented in the Booklet minimize the effect of the I-495 NEXT project to the GWMP. While the proposed project may alter the setting and feeling of the GWMP, the project does not diminish any aspects of integrity that contribute to the significance of the resource.

The Booklet outlines four gateway options for traffic traveling from the express lanes and general purpose lanes from I-495 onto the GWMP. Three of the options involve the construction of a stone-faced retaining wall, while one option proposes an alteration by laying back the slope to the south of the GWMP. The VDOT presented the VDHR an opportunity to review and comment on the four design options presented in the Booklet. In an April 2020 letter the VDHR expressed their preference for Option 1, the option that proposes to lay back the slope to the south of the GWMP versus the other three options. The VDHR maintains that Option 1 is the preferred option because it will not result in the introduction of new features on the landscape. However, the VDHR withheld their decision on a final effect determination for the project in order to give the NPS an opportunity to review and comment on the four options presented in the Booklet.

In April 2020, the VDOT received a letter from the NPS stating that the agency agreed with VDOT's no adverse effect determination for the I-495 NEXT project provided that VDOT used Option 1 for the project. In an October 2020 letter, the NPS provided additional guidance and conditions to support the no adverse effect determination. In the October 2020 letter, the NPS requested that the VDOT minimize loss of forest and mitigate for any loss of vegetation in the vicinity where I-495 connects with the GWMP. Further, the NPS recommends that sound wall treatments on VDOT property complement existing walls and architecture along the GWMP.

In an attempt to support the no adverse effect determination for the I-495 NEXT project, VDOT shall commit to the following conditions. The VDOT shall utilize Option 1, as described in the Booklet, at the entrance to the GWMP off I-495. The landscaping completed for the project shall meet NPS standards and specifications, apply the minimization and mitigations efforts requested by the NPS, as well as incorporate the results of the tree survey already completed for this project. VDOT shall consult with the NPS and consulting parties to ensure that the NPS-selected gateway design concept will avoid any adverse effects to the GWMP. VDOT shall develop a major milestones design review schedule in consultation with the Virginia SHPO, the NPS and other consulting parties. The major milestones design review schedule shall include at least two interim submissions for review.

Page 5 of 7

**Marc Holma**

**14 January 2021**

**Determination of Effect**

The implementing regulations of Section 106 of the NHPA define an effect as an “alteration to the characteristics of a historic property qualifying it for inclusion in or eligible for the National Register” [36CFR800.16 (i)]. The effect is adverse only when the alteration of a qualifying characteristic occurs in a “manner that would diminish the integrity of the property’s location, design, setting, materials, workmanship, feeling, or association” [36CFR800.5 (a)]. VDOT Cultural Resources staff have reviewed the plans for this project, which reflect VDOT’s concerted efforts to minimize and avoid impacts to historic properties, as documented in part by the Booklet, and have determined that the project as proposed will alter but not diminish the integrity of historic properties within the project’s APE. As such, VDOT has determined that the revised design of the I-495 NEXT Project will have No Adverse Effect on historic properties in accordance with 36 CFR 800.5(b), provided that conditions are imposed and implemented to avoid adverse effects on the GWMP (VDHR No.: 029-0228) and the Dead Run Ridges Archaeological District (44FX3922), as well as its contributing resources Archaeological Sites 44FX0374, 44FX0379, 44FX0389, and 44FX2430 (see discussion above and concurrence page).

VDOT looks forward to receiving any comments you or other consulting parties may have about these findings. We ask that comments be provided within 30 days of receipt of this letter. If the Virginia SHPO concurs with VDOT’s findings, we invite you to complete the signature block below and return it to my attention. Please contact Sarah at (804) 371-6710, [Sarah.Clarke@VDOT.virginia.gov](mailto:Sarah.Clarke@VDOT.virginia.gov), or Will at (804) 786-2852, [William.Moore@VDOT.virginia.gov](mailto:William.Moore@VDOT.virginia.gov), if you have questions about this project.

Sincerely,



Sarah M. Clarke  
Environmental Program Planner  
Cultural Resources



William H. Moore  
Environmental Program Planner  
Cultural Resources

Page 6 of 7

**Marc Holma**

**14 January 2021**

- c. Fairfax County History Commission  
Tammy Stidham, National Park Service, National Capital Region  
Charles Cuvelier, Superintendent, George Washington Memorial Parkway  
Maureen Joseph, George Washington Memorial Parkway  
Steve Archer, Maryland State Highway



Page 7 of 7

Marc Holma

14 January 2021

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The Virginia Department of Historic Resources (VDHR) concurs with the Virginia Department of Transportation (VDOT) that:

- No further cultural resources survey is warranted at this time. VDOT shall monitor design efforts and consult with the Virginia SHPO and other consulting parties should additional survey efforts be necessary.
- The project as proposed will have No Adverse Effect on historic properties, provided the following conditions to avoid adverse effects are implemented:
  - VDOT shall include design constraints in the Request for Proposals requiring the design-builder to remain within the current LOD where possible in designing and constructing project improvements in the vicinity of Archaeological Sites 44FX0374, 44FX0379, 44FX0389, and 44FX2430. VDOT shall ensure that the Concessionaire includes a Special Provision in the design-build contract with the design-builder, requiring that safety fencing is erected along the LOD to ensure avoidance of any ground disturbance to Sites 44FX0374, 44FX0379, 44FX0389, or 44FX2430 during construction of the project, or by construction vehicles entering and leaving the project corridor.
  - VDOT shall implement Option 1 as presented in the *George Washington Memorial Parkway Visualization Booklet* dated February 6, 2020 and selected by the VA SHPO and the NPS as the preferred option for the I-495 NEXT project.
  - VDOT shall construct any infrastructure, such as retaining walls on NPS lands (if required and approved by NPS), associated with the NPS-selected gateway Option 1 in accordance with NPS specifications.
  - VDOT shall install any necessary plantings on NPS lands associated with the NPS-selected gateway option in accordance with NPS specifications.
  - VDOT shall minimize the amount of forest removal and mitigate for forest removal deemed necessary to implement Option 1.
  - VDOT shall coordinate the design and location of the signage to be installed within the George Washington Memorial Parkway for the I-495 NEXT project with the NPS.
  - VDOT shall consult with the GWMP and the Virginia SHPO at major milestones in project design to ensure the design remains consistent with these conditions to avoid adverse effects on the GWMP.

For VDOT Project No. 0495-029-419, P101; UPC: 113414; VDHR File No.: 2018-0473.

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Julie V. Langan  
Director, Virginia Department of Historic Resources  
Virginia State Historic Preservation Officer

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Date

Page 7 of 7

Marc Holma


14 January 2021

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The Virginia Department of Historic Resources (VDHR) concurs with the Virginia Department of Transportation (VDOT) that:

- No further cultural resources survey is warranted at this time. VDOT shall monitor design efforts and consult with the Virginia SHPO and other consulting parties should additional survey efforts be necessary.
- The project as proposed will have No Adverse Effect on historic properties, provided the following conditions to avoid adverse effects are implemented:
  - VDOT shall include design constraints in the Request for Proposals requiring the design-builder to remain within the current LOD where possible in designing and constructing project improvements in the vicinity of Archaeological Sites 44FX0374, 44FX0379, 44FX0389, and 44FX2430. VDOT shall ensure that the Concessionaire includes a Special Provision in the design-build contract with the design-builder, requiring that safety fencing is erected along the LOD to ensure avoidance of any ground disturbance to Sites 44FX0374, 44FX0379, 44FX0389, or 44FX2430 during construction of the project, or by construction vehicles entering and leaving the project corridor.
  - VDOT shall implement Option 1 as presented in the *George Washington Memorial Parkway Visualization Booklet* dated February 6, 2020 and selected by the VA SHPO and the NPS as the preferred option for the I-495 NEXT project.
  - VDOT shall construct any infrastructure, such as retaining walls on NPS lands (if required and approved by NPS), associated with the NPS-selected gateway Option 1 in accordance with NPS specifications.
  - VDOT shall install any necessary plantings on NPS lands associated with the NPS-selected gateway option in accordance with NPS specifications.
  - VDOT shall minimize the amount of forest removal and mitigate for forest removal deemed necessary to implement Option 1.
  - VDOT shall coordinate the design and location of the signage to be installed within the George Washington Memorial Parkway for the I-495 NEXT project with the NPS.
  - VDOT shall consult with the GWMP and the Virginia SHPO at major milestones in project design to ensure the design remains consistent with these conditions to avoid adverse effects on the GWMP.

For VDOT Project No. 0495-029-419, P1O1; UPC: 113414; VDHR File No.: 2018-0473.

  
Julie V. Langan  
Director, Virginia Department of Historic Resources  
Virginia State Historic Preservation Officer

21 Jan 2021  
Date

**From:** [Iosco, Robert](#)  
**To:** [Abraham Lerner](#); [Prunty, Rob](#); [Krebs, Meredith](#); [Scott Smizik](#)  
**Subject:** Fwd: De Minimis for I-495 NEXT  
**Date:** Thursday, January 28, 2021 7:41:21 AM

---

FYI

**Robert Iosco**  
Virginia MegaProjects  
Virginia Department of Transportation  
Northern Virginia District  
4975 Alliance Drive  
Fairfax, VA 22030

Email: [Robert.Iosco@VDOT.Virginia.gov](mailto:Robert.Iosco@VDOT.Virginia.gov)  
Telephone: 703-259-2764

----- Forwarded message -----

From: **Holma, Marc** <[marc.holma@dhr.virginia.gov](mailto:marc.holma@dhr.virginia.gov)>  
Date: Thu, Jan 28, 2021 at 8:37 AM  
Subject: Re: De Minimis for I-495 NEXT  
To: Clarke, Sarah <[sarah.clarke@vdot.virginia.gov](mailto:sarah.clarke@vdot.virginia.gov)>  
Cc: Robert Iosco <[robert.iosco@vdot.virginia.gov](mailto:robert.iosco@vdot.virginia.gov)>, John Simkins <[john.simkins@dot.gov](mailto:john.simkins@dot.gov)>, Opperman, Antony <[a.opperman@vdot.virginia.gov](mailto:a.opperman@vdot.virginia.gov)>

Received and understood. Thanks, Sarah.

Marc

On Wed, Jan 27, 2021 at 2:51 PM Clarke, Sarah <[sarah.clarke@vdot.virginia.gov](mailto:sarah.clarke@vdot.virginia.gov)> wrote:

Hi Marc,

I wanted to let you know that FHWA intends to use DHR's no adverse effect concurrence for the I-495 NEXT project as the basis for a de minimis finding for the project.

Let me know if you need anything from me or if you have any questions.

Thank you,

Sarah

--

*Sarah M. Clarke*  
*Virginia Department of Transportation*  
*Environmental Program Planner, Cultural Resources*  
*1201 E. Broad St.*  
*Richmond, VA 23219*  
*(o) 804-371-6710*  
*(e) 804-347-5825*





## FAIRFAX COUNTY PARK AUTHORITY



12055 Government Center Parkway, Suite 927 • Fairfax, VA 22035-5500  
703-324-8700 • Fax: 703-324-3974 • [www.fairfaxcounty.gov/parks](http://www.fairfaxcounty.gov/parks)

June 19, 2020

Abraham Lerner, P.E.  
VDOT Special Project Development Associate Manager  
Virginia Department of Transportation  
4975 Alliance Drive  
Fairfax, VA 22030

Dear Mr. Lerner,

The Fairfax County Park Authority (FCPA) has reviewed your DRAFT Section 4(f); Significance Determination, Temporary Occupancy, and *DE MINIMUS* letter, dated February 6, 2020, for the I-495 Express Lanes Northern Extension (I-495 NEXT) Project. This project is proposing to extend the Interstate 495 (I-495) Express Lanes for approximately three (3) miles from the I-495/Dulles Toll Road interchange to the George Washington Memorial Parkway (GWMP) in the McLean area of Fairfax County. Planning level estimates indicate that the proposed design for this project will require temporary grading and construction easements and permanent fee simple acquisition on portions of Scotts Run Nature Preserve (the Preserve), a property protected under Section 4(f) of the Department of Transportation Act of 1966.

The Preserve, previously identified as the Burling Tract, was purchased by the Fairfax County Board of Supervisors, and later transferred to FCPA, with assistance from the Land and Water Conservation Fund (LWCF). According to the Virginia Department of Conservation and Recreation (DCR), "Section 6(f)(3) of the Land & Water Conservation Fund Act of 1965, as amended, requires that property acquired or developed with LWCF assistance shall be retained and used for public outdoor recreation in perpetuity. Any property so acquired and/or developed shall not be wholly or partly converted to other than public outdoor recreation uses without the approval of NPS pursuant to Section 6(f)(3) of the LWCF Act."

FCPA appreciates that the VDOT project team has initiated coordination with FCPA staff in the early stages of this project. The attached document outlines several key factors regarding the land conversion and replacement process governed by Section 6(f) of the LWCF Act as well as specific mitigation and minimization measures to reach Section 4(f) de minimus concurrence. As further engineering and design demonstrates any additional park impacts and land takings, additional studies and concurrences may be necessary. FCPA staff is committed to work with VDOT staff and its project partners to keep this important project on schedule with the understanding that the project team will continue to coordinate with FCPA throughout the project design and construction.



If accommodations and/or alternative formats are needed, please call (703) 324-8563, at least 10 working days in advance of the registration deadline or event. TTY VA Relay 711.

The staff contact for this project is Elizabeth Iannetta, Infrastructure Coordinator, who can be reached at (703) 324-8725 or [Elizabeth.Iannetta@fairfaxcounty.gov](mailto:Elizabeth.Iannetta@fairfaxcounty.gov). We look forward to working with you as this project progresses.

Sincerely,

A handwritten signature in black ink, appearing to read "Kirk Kincannon". The signature is written in a cursive style and is positioned above the typed name.

Kirk Kincannon,  
Executive Director

Attachment 1: Section 6(f) of the LWCF Act & Section 4(f) Mitigation & Minimization Recommendations

Copy: Aimee L. Vosper, Deputy Director/CBD, Acting Director, Resource Management Division (RMD)  
Sara Baldwin, Deputy Director/COO  
David R. Bowden, P.E., Director, Planning and Development Division (PDD)  
Anna Bentley, Manager, Park Planning Branch, PDD  
Andrea Dorlester, Development Review Section Chief, Park Planning Branch, PDD  
Elizabeth Iannetta, Infrastructure Coordinator, Park Planning Branch, PDD  
Cindy McNeal, P.E., Land Acquisition & Management Branch, PDD  
John Burke, Manager, Natural Resources Branch, RMD  
Liz Crowell, Manager, Archaeology & Collections Branch, RMD  
Dan Sutherland, Manager, Grounds Management, Park Operations Division (POD)  
Robert Iosco, Virginia MegaProject, VDOT

**Attachment 1**

**I-495 Express Lanes Northern Extension (I-495 NEXT) Project  
Section 6(f) of the LWCF Act & Section 4(f) Mitigation & Minimization Recommendations**

Background:

The United States Department of the Interior (USDOI), Bureau of Outdoor Recreation, approved Project Proposal 51-00053, dated August 17, 1970, for the acquisition of approximately 336 acres of land that was identified as the Burling Tract, with the Land and Water Conservation Fund (LWCF). The Burling Tract was purchased by the Fairfax County Board of Supervisors (BOS), the deed was recorded in Deed Book 3343 at Page 532 on September 4, 1970. The BOS transferred the land to Fairfax County Park Authority (FCPA) as recorded in Deed Book 12327 at Page 2170 on October 29, 2001. The Burling Tract includes what is now FCPA Scotts Run Nature Preserve, Tax Map #21-1((1))3, which will be impacted by the VDOT Project.

- According to the Virginia Department of Conservation and Recreation (DCR), “Section 6(f)(3) of the Land & Water Conservation Fund Act of 1965, (LWCF) as amended, requires that property acquired or developed with LWCF assistance shall be retained and used for public outdoor recreation in perpetuity. Any property so acquired and/or developed shall not be wholly or partly converted to other than public outdoor recreation uses without the approval of NPS pursuant to Section 6(f)(3) of the LWCF Act.”
- VDOT's project impacts will require a LWCF land conversion. VDOT will need to coordinate the administrative and public processes for the land conversion process with FCPA, DCR, and NPS.
- DCR and the National Park Service (NPS) will need to review and approve any conversion and the suitability of substitute lands that would be acquired to offset the conversion.
- VDOT will need to coordinate the land conversion process timeline with the project schedule.

The Park Authority requires any adverse impacts to these resources by VDOT and/or its project partners follow FCPA Policy 201 titled Natural Resources (<http://www.fairfaxcounty.gov/parks/parkpolicy/park-policy-manual.pdf>) and the agency-wide Natural Resource Management Plan, recommended action number eight (<http://www.fairfaxcounty.gov/parks/resource-management/downloads/nrmp012914.pdf>). VDOT and/or its project partners will need to agree to rehabilitate any temporary impacts to natural resources to Park Authority standards and mitigate/compensate for permanent impacts to natural resources on Park Authority managed lands. This requirement applies to any natural resource impact (terrestrial or aquatic) that is not regulated under the jurisdiction of any federal or state agency. Total impacts and mitigation/compensation costs will be determined upon completion of the site design.

Scott's Run Nature Preserve has several significant resources that would be impacted by this project. The ecological community impacted by this effort has been classified as Mesic Mixed Hardwood Forest. The area that would be most impacted by this project scored an 11.5 out of 16 in the Non-Native Assessment and Prioritization survey. This categorization makes the area a high priority for active management. It has been treated for invasive plants for several years to maintain ecological integrity.

- Scotts Run Nature Preserve will experience direct impacts of lost parkland, vegetation, habitat and increased storm water discharge, invasive species as well as wildlife impacts. Therefore, we would like to review all future documents and plans as the project progresses.



- VDOT shall agree to rehabilitate any temporary impacts to natural resources to Park Authority standards and mitigate/compensate for permanent impacts to natural resources on Park Authority managed lands. This requirement shall apply to any natural resource impact (terrestrial or aquatic) that is not regulated under the jurisdiction of any federal or state agency.
- The Park Authority defines permanent impact as any habitat type conversion, for example, forest to grassland, and temporary impact as replacement of the same habitat type or better, for example, grassland to grassland.
- Mitigation/compensation for permanent impacts shall be determined using the Fairfax County Land Development Services 2020 Unit Price Schedule to determine a replacement cost. Forest, woodland, and shrubland habitat types shall be mitigated/compensated for at \$61,049 an acre, and grassland shall be mitigated/compensated for at \$14,520 an acre. Total impacts and mitigation/compensation costs shall be determined upon completion of the site design.
- The FCPA requests the results of any endangered species surveys conducted in preparation to or as part of this project.
- VDOT will stabilize areas within the construction footprint within Scott's Run Nature Preserve using a native seed mix as specified by the FCPA. Once construction is complete, FCPA will rehabilitate these areas to the habitat type. VDOT will compensate FCPA to design, install and maintain these rehabilitated areas for up to three (3) years.
- Any impacts that extend beyond the Limits of Disturbance (LOD), including root and branch pruning, must follow Policy 201 for Natural Resources or be mitigated/compensated for.
- The subject area was subjected to cultural resources review. Since the project requires Federal permitting and may include Federal funding, it would trigger Section 106, requiring VDOT to consult with Virginia Department of Historic Resources by Federal Regulation.
- FCPA recommends any areas with ground disturbance throughout the project corridor that are not previously surveyed, undergo Phase I archaeological survey. If sites are found that are potentially significant to the history of Fairfax County, or potentially eligible for inclusion onto the National Register of Historic Places they should undergo Phase II archaeological testing. If sites are found significant or eligible, avoidance or Phase III data recovery is recommended.
- In addition, Site 44FX2430, which is located within the LOD on the Scotts Run Nature Preserve property, may be impacted. FCPA recommends avoidance of the site. If the site cannot be avoided, FCPA further recommends Phase II archaeological testing. If the site is found significant or eligible, Phase III data recovery is recommended.
- Depending on the final scope of the work, staff recommends the removal of spoils from offsite dumping of debris, then at the end of the project have VEPCO secure their easement access with a gate or other barrier type feature to eliminate future offsite dumping on parkland.



## COMMONWEALTH of VIRGINIA

DEPARTMENT OF TRANSPORTATION  
4975 Alliance Drive  
Fairfax, Virginia 22030

Stephen C. Brich, P.E.  
Commissioner

March 24, 2021

Mr. Charles Cuvelier  
Superintendent  
George Washington Memorial Parkway  
700 George Washington Memorial Parkway  
McLean, VA 22101

**SUBJECT: I-495 Express Lanes Northern Extension (Project NEXT)**  
State Project Number: 0495-029-419, P101  
UPC Number: 113414  
From: Dulles Toll Road (Route 267) Interchange  
To: George Washington Memorial Parkway Interchange  
**SECTION 4(f); SIGNIFICANCE DETERMINATION, TEMPORARY  
OCCUPANCY, AND *DE MINIMIS* IMPACTS**

Dear Superintendent Cuvelier:

As you are aware, the Virginia Department of Transportation (VDOT), in cooperation with the Federal Highway Administration (FHWA), is proposing to extend the Interstate 495 (I-495) Express Lanes for approximately three miles, from the I-495/Dulles Toll Road (Route 267) interchange to the George Washington Memorial Parkway (GWMP) in the McLean area of Fairfax County, Virginia. The project is intended to reduce congestion and improve travel reliability as population and employment continue to grow in the region, and to provide additional travel choices to single-occupancy drivers while encouraging high-occupancy travel modes. The project would include the construction of several shared-use paths and bicycle facilities.

Planning-level estimates indicate that the proposed design for the project will require a temporary construction easement not to exceed 1.3 acres, and a permanent easement not to exceed approximately 0.9 acres, of the GWMP, a property protected under Section 4(f) of the Department of Transportation Act of 1966 (Section 4(f)). The proposed temporary and permanent easements are identified on Figure 1.

Superintendent Cuvelier

March 24, 2021

Page 2 of 6

Under Section 4(f), FHWA may approve a transportation project requiring the use of publicly owned land of a public park, recreation area, wildlife and waterfowl refuge, or land of a historic site that is listed on or eligible for listing on the National Register of Historic Places only if: (1) there is no feasible and prudent alternative to using that land; and (2) the project includes all possible planning to minimize harm to the park, recreation area, wildlife and waterfowl refuge, or historic site resulting from the use; or the use of the property will have a *de minimis* impact.

The purpose of this letter is two-fold: 1) to request that the National Park Service (NPS) make a determination as to whether the GWMP is a significant property in their system, and; 2) to request concurrence from the NPS regarding certain aspects of compliance with Section 4(f), namely, (a) that the temporary occupancy not to exceed 1.3 acres of the GWMP would be minor and not permanently adverse, and that there would be no interference with the activities, features, or attributes that qualify the property for protection under Section 4(f) either on a temporary or permanent basis; and, (b) that the permanent easement not to exceed approximately 0.9 acres of the GWMP will not adversely affect the activities, features and attributes that qualify the property for protection under Section 4(f). If the NPS concurs with this determination, it is FHWA's intent to 1) determine that the temporary occupancy not to exceed approximately 1.3 acres does not constitute a Section 4(f) use, and 2) make a Section 4(f) *de minimis* finding for the permanent easement not to exceed approximately 0.9 acres of the GWMP pursuant to 23 CFR 774.3(b).

#### **DETERMINATION OF SIGNIFICANCE**

Section 4(f) applicability for a public park, recreation area, or wildlife or waterfowl refuge requires a determination by the officials with jurisdiction over the property as to whether the property is significant. In the absence of this determination, the Section 4(f) property would be presumed to be significant and Section 4(f) would apply. If the officials having jurisdiction over the resource conclude that the entire property is not significant, then the provisions of Section 4(f) would not apply.

#### **TEMPORARY OCCUPANCY**

Planning-level estimates indicate a temporary construction easement not to exceed approximately 1.3 acres would be needed for construction. A definitive calculation will be completed when more detailed design information is available. According to FHWA's regulations implementing Section 4(f), a temporary occupancy of Section 4(f) land does not constitute "use" under Section 4(f) if the following conditions are met (23 CFR 774.13(d)):



Superintendent Cuvelier

March 24, 2021

Page 3 of 6

**1. Duration (of the occupancy) must be temporary (i.e., less than the time needed for construction of the project) and there should be no change in ownership of the land –**

Occupancy, construction, and required access within the GWMP would take only as long as necessary, which would be less than the time needed to build the entire facility.

A temporary easement to permit construction within a portion of the GWMP will be effective only for the time needed to perform the work within the GWMP property and will not be used to provide staging or construction access to other portions of the project. There will be no change in ownership of the GWMP land involved in the temporary easement for construction.

Following conclusion of the Section 4(f) review and the issuance of the NEPA decision document, the NPS is anticipated to issue the Design-Build contractor a Special Use Permit for any temporary construction impacts or equipment access prior to work commencing on park lands.

**2. Scope of the work must be minor (i.e., both the nature and the magnitude of the changes are minimal) –**

Both the nature and the magnitude of the changes to the property will be minimal. Existing shrubs and grasses may be cleared. Temporary erosion and sediment controls will be installed and maintained throughout the duration of the construction to prevent soil erosion and to manage stormwater runoff. Areas that can support vegetation will be revegetated in accordance with the stipulations under the Proposed Mitigation and Minimization section below.

**3. There are no anticipated permanent adverse physical impacts, nor will there be interference with the protected activities, features, or attributes of the property that qualify the property for protection under Section 4(f), on either a temporary or permanent basis –**

The proposed temporary construction easement is not anticipated to have permanent adverse impacts nor permanent or temporary interference on the activities or purpose of the GWMP. Land that is disturbed will be revegetated in accordance with the stipulations under the Proposed Mitigation and Minimization section below after construction is complete.

**4. The land being used must be fully restored (i.e., the property must be returned to a condition which is at least as good as that which existed prior to the project) –**

The lands subject to any temporary construction easement will be returned to a natural condition which is at least as good as that which existed prior to project construction. The GWMP will be revegetated in accordance with the stipulations listed under the Proposed Mitigation and Minimization section below.

Superintendent Cuvelier

March 24, 2021

Page 4 of 6

**5. There must be a documented agreement from the NPS regarding the above conditions**

Signature and return of this concurrence document to VDOT will satisfy this final condition.

VDOT believes the proposed temporary occupancy of the GWMP does not constitute a use under Section 4(f) based on the above. We request that the NPS concur in writing with our assessment of the conditions outlined above using the signature block at the end of this letter.

***DE MINIMIS IMPACTS***

Based on preliminary calculations, the proposed design for the project is anticipated to require a permanent easement not to exceed approximately 0.9 acres of GWMP. The area from which the easement would be acquired abuts the existing GWMP eastbound lanes and incorporates the removal of vegetation necessary for the construction of the tie-in and fly-over ramps (located outside the GWMP boundary). Acquisition of this easement would not adversely affect the activities, features, or attributes of the Section 4(f) property. A definitive calculation would be completed once more detailed design information is available.

As noted above, Section 4(f) requirements may be met if FHWA determines that the use of the property will have a *de minimis* impact. In order for FHWA to make such a determination for publicly owned parks, recreation areas, and wildlife or waterfowl refuges:

**1. The project must not adversely affect activities, features, or attributes of the Section 4(f) property** –

Acquisition of this easement would not adversely affect the activities, features, or attributes of the Section 4(f) property.

The public will maintain the ability to use the GWMP for scenic recreational driving as well as for the visitation to the GWMP's associated recreational features (trails, parks or scenic vistas). Access to all of these recreational features (scenic driving, trails, parks or scenic vistas) would be maintained at all times by the Design-Build contractor. Minor changes in noise levels could occur due to closer proximity of highway right-of-way and visual quality due to vegetation clearing.

Where appropriate, existing I-495 guide signage would be consolidated to reduce the overall number of signs appearing in one area of the GWMP, while in one new location a new guide sign would be added to the existing viewshed. Views of the Potomac River and Potomac Palisades will be maintained with no impact to existing viewsheds. VDOT will also implement Option 1 from the *February 2020 Visualization Booklet* along with the other conditions highlighted in the Efforts to Minimize Harm and Mitigate Impacts Section below.

For permanent easement impacts, a highway deed easement would be executed between FHWA and NPS in accordance with 23 CFR 107.

Superintendent Cuvelier

March 24, 2021

Page 5 of 6

2. **There must be public notice and opportunity for public review and comment concerning the effects on the protected activities, features, or attributes of the property that qualify the property for Section 4(f) protection –**

VDOT provided the public with the opportunity to review and comment on the effects of the proposed de minimis impact during the October 5, 2020 and October 8, 2020 Public Hearing. Comments received from the public following the Public Hearing stated that coordination with the NPS was necessary due to the LOD encompassing portions of the GWMP.

3. **Officials with jurisdiction over the park must concur that the project will not adversely affect the activities, features, or attributes of the GWMP. –**

Signature and return of this concurrence document to VDOT will satisfy this criterion.

#### **PROPOSED MITIGATION AND MINIMIZATION**

Based on on-going coordination efforts between VDOT, the NPS and the Virginia Department of Historic Resources (SHPO), the following measures to minimize harm and mitigate impacts to the GWMP have been identified. These conditions were agreed upon via letter by VDOT and the SHPO (VDHR) on January 21, 2021 (see Exhibit 1 attached to the Letter):

- VDOT shall include design constraints in the Request for Proposals requiring the Design-Build contractor to remain within the current LOD where possible in designing and constructing project improvements in the vicinity of Archaeological Sites 44FX0374, 44FX0379, 44FX0389, and 44FX2430. VDOT shall ensure that the Concessionaire (Design-Build contractor) includes a Special Provision in the contract requiring that safety fencing is erected along the LOD to ensure avoidance of any ground disturbance to Sites 44FX0374, 44FX0379, 44FX0389, or 44FX2430 during construction of the project, or by construction vehicles entering and leaving the project corridor.
- VDOT shall implement Option 1 as presented in the *February 2020 Visualization Booklet* and selected by the SHPO and the NPS as the preferred option for the I-495 NEXT project.
- VDOT shall construct any infrastructure, such as retaining walls on NPS lands (if required and approved by NPS), associated with the NPS-selected gateway Option 1 in accordance with NPS specifications.
- VDOT shall install any necessary plantings on NPS lands associated with the NPS-selected gateway option in accordance with NPS specifications.
- VDOT shall minimize the amount of forest removal and mitigate for forest removal deemed necessary to implement Option 1.
- VDOT shall coordinate with NPS regarding the design and location of the signage to be installed within the GWMP for the I-495 NEXT project.
- VDOT shall consult with the GWMP and the SHPO at major milestones in project design to ensure the design remains consistent with these conditions to avoid adverse effects on the GWMP.
- On-going design minimization efforts to reduce the project's physical project footprint and impervious surface area within the GWMP boundary.



Superintendent Cuvelier

March 24, 2021

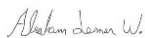
Page 6 of 6

- Continued collaboration with the NPS on potential enhancements to the visitor’s “sense of arrival” including potentially relocating the GWMP entrance sign to a more prominently visible location within the park.
- Preparation of several preliminary design concepts and viewshed visualizations of potential projects impacts at the park boundary interface. This information was provided to the NPS in meetings on December 12, 2019 and January 23, 2019 and refined for submittal on February 6, 2020; the potential concepts and visualizations are included for review in Appendix A of this document.
- Completion of a tree survey in the vicinity of the eastbound GWMP lanes, with a commitment to minimize impacts to mature and healthy trees, and to restore vegetation disturbed by construction (including the use of native seed mix and re-planting of trees per NPS’s tree replacement ratio of 1:1).
- On-going efforts to consolidate/reduce existing I-495 guide signage within the westbound lanes of the GWMP.
- Replacement of guide signing for the GWMP on the Capital Beltway to include new sign elements with brown backgrounds.
- Location of the Virginia toll signing outside of the park boundary.

VDOT believes the permanent easement will not adversely affect the activities, features, or attributes of the GWMP and requests that NPS concur with this determination using the signature block at the end of this letter.

If you concur with our assessment, please return the signed concurrence block at the end of this letter at your earliest convenience, but by no later than April 7, 2021. If you have any questions or need additional information, please do not hesitate to contact me at (703) 259-3345 or by email at [Abraham.Lerner@vdot.virginia.gov](mailto:Abraham.Lerner@vdot.virginia.gov). I appreciate your assistance and prompt attention to this matter.

Sincerely,



Digitally signed by Abraham Lerner  
DN: c=U.S., e=Abraham.Lerner@vdot.virginia.gov, o=VDOT,  
ou=Virginia MegaProjects, cn=Abraham Lerner  
Date: 2021.03.24 17:48:25 -0400

Abraham Lerner, P.E.

VDOT Special Project Development Associate Manager

Northern Virginia District

cc: John Simkins, FHWA  
Susan Shaw, P.E., VDOT  
Scott Smizik, VDOT  
Robert Iosco, VDOT


Attachments

Figure 1: Section 4(f) Impacts Related to the George Washington Memorial Parkway

Exhibit 1: Determination of Effect Letter- Virginia Department of Historic Resources- Dated January 14, 2021

**National Park Service Significance Determination and Final Concurrence with the Section 4(f) Applicability Criteria for *de minimis* Impact to the George Washington Memorial Parkway**

For the proposed northern extension of Interstate 495 (VDOT Project #0495-029-419, P101, UPC #113414) from the current northern terminus of the existing Express Lanes in the vicinity of the Old Dominion Drive overpass to the George Washington Memorial Parkway (GWMP) in the McLean area of Fairfax County, Virginia, the National Park Service (NPS) has determined that the GWMP is a significant property in their system. NPS concurs that the temporary occupancy of 1.3 acres for construction is minor and will not cause permanently adverse physical impacts to, nor interfere with the protected activities, features, or attributes of the GWMP that qualify it for protection under Section 4(f), either on a temporary or permanent basis. NPS further concurs that a permanent easement of approximately 0.9 acres of property will not permanently adversely affect the GWMP property. NPS further concurs that, based upon current design information and the commitment on the part of VDOT to minimize disturbance within the GWMP, impacts to GWMP property that could be expected to result from the project will not adversely affect activities, features, or attributes of the GWMP property. NPS hereby acknowledges that VDOT provided notice and opportunity for public review and comment, consistent with federal guidelines. This concurrence does not constitute an endorsement of the project or conveyance of any temporary or permanent interests in or access to the GWMP. This concurrence is provided with the understanding that further design information is to be provided to NPS by VDOT during project development and that further consultation with NPS will be undertaken by VDOT to ensure that, prior to granting of any temporary or permanent property interests, harm to park property by the proposed project will be minimized and the conditions upon which this concurrence is based have not changed.

Charles  Date:  
Cuvelier 2021.05.06  
08:18:16 -04'00'

May 6, 2021

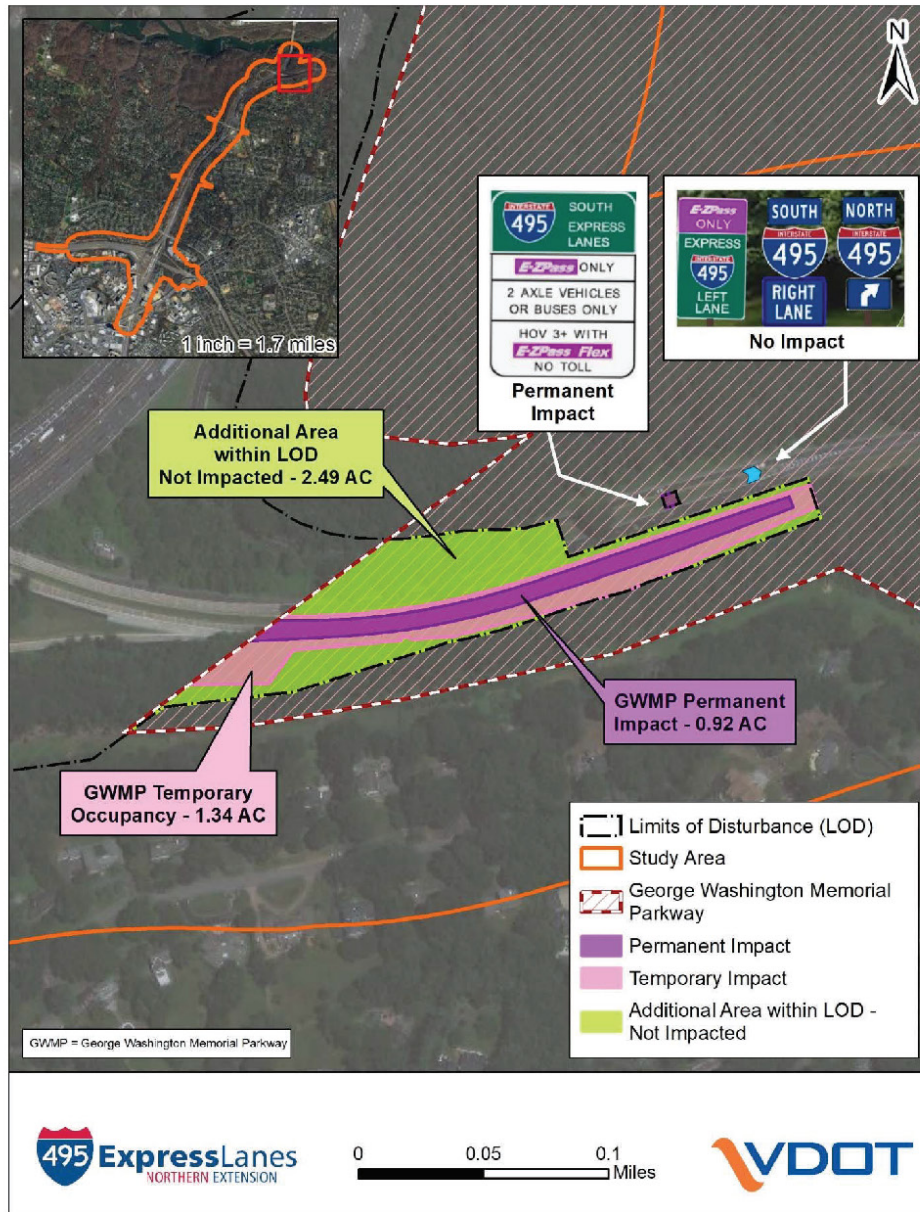
\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Charles Cuvelier  
Printed Name

\_\_\_\_\_  
Superintendent  
Title

Figure 1: Section 4(f) Impacts Related to the George Washington Memorial Parkway





**Exhibit 1: Determination of Effect Letter- Virginia Department of Historic Resources-  
Dated January 14, 2021**



COMMONWEALTH of VIRGINIA

DEPARTMENT OF TRANSPORTATION  
1400 EAST BROADWAY, SUITE 100  
RICHMOND, VIRGINIA 23219-2002

Stephen C. Briteh, P.E.  
COMMISSIONER

January 14, 2021

ROUTE: I-495  
PROJECT: 0495-029-419, PI01; UPC: 113414  
COUNTY/CITY: Fairfax County  
FUNDING: Federal  
VDHR FILE: 2018-0473  
ACTION REQUIRED: Determination of Effect

Ms. Julie V. Langan, Director  
Attn.: Mr. Marc Holma, Office of Review and  
Compliance Virginia Department of Historic Resources  
2801 Kensington Avenue  
Richmond, VA 23221

Dear Mr. Holma:

The Virginia Department of Transportation (VDOT) is studying proposed improvements to I-495 between Dulles Toll Road (Route 267) and the George Washington Memorial Parkway interchange in the vicinity of the American Legion Bridge. On behalf of the Federal Highway Administration (FHWA), VDOT has coordinated this federally-funded project, called the I-495 NEXT project, with the Virginia Department of Historic Resources (VDHR/Virginia SHPO) since 2018 in accordance with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended, and its implementing regulations, 36 CFR Part 800. Current design plans indicate that the proposed project has been revised to include additional improvements that extend beyond the limits of the APE as it was originally defined. **The purpose of this letter is to coordinate an effect determination for the cultural resources that fall within the revised Area of Potential Effect (APE) for the I-495 NEXT project.**

VDOT maintains that cultural resource work completed for this project meets the standards set forth in both the Secretary of Interior's Standards and Guidelines (1983) and the VDHR Guidelines for Conducting Historic Resource Surveys in Virginia (May 2011) with reference to the *Programmatic Agreement among the Federal Highway Administration, the U.S. Army Corps*

Page 2 of 7  
**Marc Holma**  
**14 January 2021**

*of Engineers, Norfolk District, the Tennessee Valley Authority, the Advisory Council on Historic Preservation, the Virginia State Historic Preservation Office and the Virginia Department of Transportation Regarding Transportation Undertakings Subject to Section 106 of the National Historic Preservation Act of 1966, executed August 2, 2016 (2016 Federal PA).*

**Project Overview**

VDOT, in coordination with the Federal Highway Administration (FHWA) as the lead federal agency, is preparing an Environmental Assessment (EA) for the proposed project. The study will evaluate the potential extension of the existing High Occupancy Toll (HOT) lanes from their current northern terminus at the Dulles Toll Road (Route 267) to the George Washington Memorial Parkway interchange in the vicinity of the American Legion Bridge.<sup>1</sup> The extension of HOT lanes are primarily located within existing right-of-way (ROW). The purpose for the study focuses on reducing congestion, providing additional travel choices, and improving travel reliability. The APE for archaeological resources is defined by the project's limits of disturbance (LOD); the APE for architectural resources includes the vicinity where alterations to historic feeling and setting may occur.

Cultural Heritage Group (CHG) conducted cultural resources survey of the vast majority of the APE for this project in April 2019 and May 2019. On July 30, 2019, VDOT coordinated with your office the results of this initial survey, as well as the eligibility of architectural resources located within the entire APE and the eligibility of archaeological resources located within portions of the APE that fall outside the boundaries of the GWMP. VDHR concurred with the findings of this study on August 14, 2019.

As you are aware, the I-495 NEXT project is contiguous with the I-495 & I-270 Managed Lanes Study (MLS) in Maryland. On behalf of the Maryland State Highway Administration (MSHA) and VDOT, TRC Environmental Group (TRC) conducted archaeological survey of the portions of the MLS and the portions of the I-495 NEXT projects that fall within the GWMP from July 8-17, 2019. These survey efforts were combined to more efficiently identify archaeological resources under a single permit (19-GWMP-5), which is required under the Archeological Resources Protection Act (ARPA) to conduct archaeological excavations on federal land. VDOT coordinated the results of the TRC survey with VDHR on October 30, 2019, and VDHR concurred with the findings on November 20, 2019. Since the initial coordination, the MSHA requested that the NPS comment on the eligibility of the Deep Run Ridges Archaeological Historic District. In September 2020, the NPS concurred with the MSHA that Archaeological Sites 44FX0374, 44FX0381, and 44FX0389 are contributing sites to the Dead Run Ridges Archaeological Historic District (44FX3922).

**Assessment of Effect**

*Architecture*

Based on current design, only one architectural historic property, the George Washington

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<sup>1</sup> The project is administered as a Public-Private Partnership (P-3) between VDOT and a P-3 concessionaire. The concessionaire will be responsible for constructing the project and procuring a design-builder. VDOT shall ensure that the Section 106 commitments identified in this letter are carried out by the concessionaire through VDOT's review and concurrence responsibilities in its partnership with the concessionaire.

Page 3 of 7  
Marc Holma  
14 January 2021

Memorial Parkway (GWMP) (VDHR No. 029-0228), falls within the project APE. The Georgetown Pike (VDHR No. 029-0466) is in the vicinity of the APE; however the 0.53 mile section at the I-495 Interchange does not contribute to and is not included within the NRHP listed portion of the Georgetown Pike. The Tysons Corner Mall (VDHR No. 029-6464) does fall within the APE for indirect effects. However, the proposed project will not directly impact Tysons Corner Mall, nor will it alter the existing feeling and setting of the resource. Therefore, VDOT maintains that the proposed project will have no effect on the Tysons Corner Mall.

With regard to the GWMP, VDOT's assessment of effect has been informed by two documents: the NRHP nomination for the GWMP prepared by the NPS in 1995 and the Cultural Landscape Inventory (CLI) for the North Parkway published by the NPS in 2009. The NRHP nomination specifically excludes the I-495/GWMP interchange from the defined historic property, and most project elements are located within that excluded interchange. In addition, the CLI identifies certain aspects of the North Parkway that are important landscape elements including views of the Potomac Palisades, stone walls, the tree canopy and the configuration of the Parkway itself. Of those elements, only the tree canopy and the Parkway's configuration are within the project's APE. Alteration of the canopy will occur only as a result of the four gateway options in an area that had minimal forest cover during the GWMP's period of significance defined in the NRHP nomination (see Attachment: *George Washington Memorial Parkway Visualization Booklet*, page 8).<sup>2</sup> Further, the overall configuration of the Parkway itself will be altered only by extending the existing merge taper for a distance of approximately 1150 feet within the NRHP boundaries of the GWMP. It is VDOT's opinion that neither of these alterations to character-defining features of the GWMP rise to the level of diminishing those features.

#### *Archaeology*

Although the Dead Run Ridges Archaeological District (44FX3922) is located within the APE for archaeological resources, the APE does not extend within any of the archaeological resources that contribute to the NRHP eligibility of the district, and no other archaeological sites eligible for or listed on the NRHP are located within the APE for archaeological resources (Figure 3). Three NRHP-eligible archaeological sites (44FX0374, 44FX0379, and 44FX0389) and one unevaluated archaeological site (44FX2430), however, are located immediately adjacent to the Project LOD.

#### *Proposed Design*

The VDOT design team worked closely with the NPS and consulting parties in order to develop a project that considers the setting and feeling of the GWMP. The goal behind the design is to minimize the visual and physical impact to the GWMP, while incorporating elements of design that creates a gateway entrance to the GWMP off I-495. Early in the Section 106 process, the NPS stated that a design clearly identifying the GWMP to drivers exiting I-495 was preferred. To meet this request, the design consultant presented a *George Washington Memorial Parkway Visualization Booklet* (the Booklet) at the February 6, 2020 consulting parties meeting (a copy of the Booklet is included with this correspondence). The Booklet presents a design concept that addresses the NPS's desire for a clear gateway to the GWMP, proposed directional signage to I-

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<sup>2</sup> The *Visualization Booklet*, dated February 6, 2020, is an Attachment to this letter by reference. It was distributed to all the consulting parties and is not physically attached. If additional copies are needed, please contact VDOT.



Page 4 of 7  
**Marc Holma**  
**14 January 2021**

495 from the GWMP, and the merging of the express lanes and general purpose lanes from I-495 from the south onto the GWMP. VDOT maintains that the design options presented in the Booklet minimize the effect of the I-495 NEXT project to the GWMP. While the proposed project may alter the setting and feeling of the GWMP, the project does not diminish any aspects of integrity that contribute to the significance of the resource.

The Booklet outlines four gateway options for traffic traveling from the express lanes and general purpose lanes from I-495 onto the GWMP. Three of the options involve the construction of a stone-faced retaining wall, while one option proposes an alteration by laying back the slope to the south of the GWMP. The VDOT presented the VDHR an opportunity to review and comment on the four design options presented in the Booklet. In an April 2020 letter the VDHR expressed their preference for Option 1, the option that proposes to lay back the slope to the south of the GWMP versus the other three options. The VDHR maintains that Option 1 is the preferred option because it will not result in the introduction of new features on the landscape. However, the VDHR withheld their decision on a final effect determination for the project in order to give the NPS an opportunity to review and comment on the four options presented in the Booklet.

In April 2020, the VDOT received a letter from the NPS stating that the agency agreed with VDOT's no adverse effect determination for the I-495 NEXT project provided that VDOT used Option 1 for the project. In an October 2020 letter, the NPS provided additional guidance and conditions to support the no adverse effect determination. In the October 2020 letter, the NPS requested that the VDOT minimize loss of forest and mitigate for any loss of vegetation in the vicinity where I-495 connects with the GWMP. Further, the NPS recommends that sound wall treatments on VDOT property complement existing walls and architecture along the GWMP.

In an attempt to support the no adverse effect determination for the I-495 NEXT project, VDOT shall commit to the following conditions. The VDOT shall utilize Option 1, as described in the Booklet, at the entrance to the GWMP off I-495. The landscaping completed for the project shall meet NPS standards and specifications, apply the minimization and mitigations efforts requested by the NPS, as well as incorporate the results of the tree survey already completed for this project. VDOT shall consult with the NPS and consulting parties to ensure that the NPS-selected gateway design concept will avoid any adverse effects to the GWMP. VDOT shall develop a major milestones design review schedule in consultation with the Virginia SHPO, the NPS and other consulting parties. The major milestones design review schedule shall include at least two interim submissions for review.

Page 5 of 7  
Marc Holma  
14 January 2021

**Determination of Effect**

The implementing regulations of Section 106 of the NHPA define an effect as an “alteration to the characteristics of a historic property qualifying it for inclusion in or eligible for the National Register” [36CFR800.16 (i)]. The effect is adverse only when the alteration of a qualifying characteristic occurs in a “manner that would diminish the integrity of the property’s location, design, setting, materials, workmanship, feeling, or association” [36CFR800.5 (a)]. VDOT Cultural Resources staff have reviewed the plans for this project, which reflect VDOT’s concerted efforts to minimize and avoid impacts to historic properties, as documented in part by the Booklet, and have determined that the project as proposed will alter but not diminish the integrity of historic properties within the project’s APE. As such, VDOT has determined that the revised design of the I-495 NEXT Project will have No Adverse Effect on historic properties in accordance with 36 CFR 800.5(b), provided that conditions are imposed and implemented to avoid adverse effects on the GWMP (VDHR No.: 029-0228) and the Dead Run Ridges Archaeological District (44FX3922), as well as its contributing resources Archaeological Sites 44FX0374, 44FX0379, 44FX0389, and 44FX2430 (see discussion above and concurrence page).

VDOT looks forward to receiving any comments you or other consulting parties may have about these findings. We ask that comments be provided within 30 days of receipt of this letter. If the Virginia SHPO concurs with VDOT’s findings, we invite you to complete the signature block below and return it to my attention. Please contact Sarah at (804) 371-6710, [Sarah.Clarke@VDOT.virginia.gov](mailto:Sarah.Clarke@VDOT.virginia.gov), or Will at (804) 786-2852, [William.Moore@VDOT.virginia.gov](mailto:William.Moore@VDOT.virginia.gov), if you have questions about this project.

Sincerely,



Sarah M. Clarke  
Environmental Program Planner  
Cultural Resources



William H. Moore  
Environmental Program Planner  
Cultural Resources

Page 6 of 7  
**Marc Holma**  
**14 January 2021**

- c. Fairfax County History Commission  
Tammy Stidham, National Park Service, National Capital Region  
Charles Cuvelier, Superintendent, George Washington Memorial Parkway  
Maureen Joseph, George Washington Memorial Parkway  
Steve Archer, Maryland State Highway



Page 7 of 7  
Marc Holma  
14 January 2021

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The Virginia Department of Historic Resources (VDHR) concurs with the Virginia Department of Transportation (VDOT) that:

- No further cultural resources survey is warranted at this time. VDOT shall monitor design efforts and consult with the Virginia SHPO and other consulting parties should additional survey efforts be necessary.
- The project as proposed will have No Adverse Effect on historic properties, provided the following conditions to avoid adverse effects are implemented:
  - VDOT shall include design constraints in the Request for Proposals requiring the design-builder to remain within the current LOD where possible in designing and constructing project improvements in the vicinity of Archaeological Sites 44FX0374, 44FX0379, 44FX0389, and 44FX2430. VDOT shall ensure that the Concessionaire includes a Special Provision in the design-build contract with the design-builder, requiring that safety fencing is erected along the LOD to ensure avoidance of any ground disturbance to Sites 44FX0374, 44FX0379, 44FX0389, or 44FX2430 during construction of the project, or by construction vehicles entering and leaving the project corridor.
  - VDOT shall implement Option 1 as presented in the *George Washington Memorial Parkway Visualization Booklet* dated February 6, 2020 and selected by the VA SHPO and the NPS as the preferred option for the I-495 NEXT project.
  - VDOT shall construct any infrastructure, such as retaining walls on NPS lands (if required and approved by NPS), associated with the NPS-selected gateway Option 1 in accordance with NPS specifications.
  - VDOT shall install any necessary plantings on NPS lands associated with the NPS-selected gateway option in accordance with NPS specifications.
  - VDOT shall minimize the amount of forest removal and mitigate for forest removal deemed necessary to implement Option 1.
  - VDOT shall coordinate the design and location of the signage to be installed within the George Washington Memorial Parkway for the I-495 NEXT project with the NPS.
  - VDOT shall consult with the GWMP and the Virginia SHPO at major milestones in project design to ensure the design remains consistent with these conditions to avoid adverse effects on the GWMP.

For VDOT Project No. 0495-029-419, P101; UPC: 113414; VDHR File No.: 2018-0473.

\_\_\_\_\_  
Julie V. Langan  
Director, Virginia Department of Historic Resources  
Virginia State Historic Preservation Officer

\_\_\_\_\_  
Date

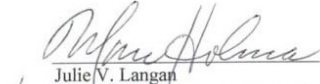
Page 7 of 7  
Marc Holma  
14 January 2021

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  - VDOT shall implement Option 1 as presented in the *George Washington Memorial Parkway Visualization Booklet* dated February 6, 2020 and selected by the VA SHPO and the NPS as the preferred option for the I-495 NEXT project.
  - VDOT shall construct any infrastructure, such as retaining walls on NPS lands (if required and approved by NPS), associated with the NPS-selected gateway Option 1 in accordance with NPS specifications.
  - VDOT shall install any necessary plantings on NPS lands associated with the NPS-selected gateway option in accordance with NPS specifications.
  - VDOT shall minimize the amount of forest removal and mitigate for forest removal deemed necessary to implement Option 1.
  - VDOT shall coordinate the design and location of the signage to be installed within the George Washington Memorial Parkway for the I-495 NEXT project with the NPS.
  - VDOT shall consult with the GWMP and the Virginia SHPO at major milestones in project design to ensure the design remains consistent with these conditions to avoid adverse effects on the GWMP.

For VDOT Project No. 0495-029-419, P101; UPC: 113414; VDHR File No.: 2018-0473.

  
Julie V. Langan  
Director, Virginia Department of Historic Resources  
Virginia State Historic Preservation Officer

21 Jan 2021  
Date

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## FAIRFAX COUNTY PARK AUTHORITY



May 12, 2021

Abraham Lerner, P.E.  
VDOT Special Project Development Associate Manager  
Virginia Department of Transportation  
4975 Alliance Drive  
Fairfax, VA 22030

Subject: I-495 Express Lanes Northern Extension (Project NEXT)  
State Project Number: 0495-029-419, P101  
UPC Number: 113414  
From: Dulles Toll Road (Route 267) Interchange  
To: George Washington Memorial Parkway Interchange  
**SECTION 4(f); SIGNIFICANCE DETERMINATION, TEMPORARY OCCUPANCY, AND  
DE MINIMIS IMPACTS**

Dear Mr. Lerner,

The Fairfax County Park Authority (FCPA) has received your Section 4(f); Significance Determination, Temporary Occupancy, and *DE MINIMIS* letter, dated March 25, 2021, for the I-495 Express Lanes Northern Extension (NEXT) Project. This project proposes to extend the I-495 Express Lanes for approximately three (3) miles from the Dulles Toll Road Interchange to the George Washington Memorial parkway in the McLean area of Fairfax County. Planning level estimates indicate that the proposed design for the project will require a temporary grading and construction easement not to exceed 3.01 acres, and permanent fee simple incorporation of up to approximately 1.10 acres of the Scotts Run Nature Preserve, a property protected under Section 4(f) of the Department of Transportation Act of 1966 as delineated in Attachment 1. Your letter requests FCPA's concurrence that the proposed project would not adversely affect activities, features, and attributes of the Scotts Run Nature Preserve (the Preserve), owned by the FCPA.

The Preserve was purchased by the Fairfax County Board of Supervisors, and later transferred to FCPA, with assistance from the Land and Water Conservation Fund (LWCF). According to the Virginia Department of Conservation and Recreation (DCR), "Section 6(f)(3) of the Land & Water Conservation Fund Act of 1965, as amended, requires that property acquired or developed with LWCF assistance shall be retained and used for public outdoor recreation in perpetuity. Any property so acquired and/or developed shall not be wholly or partly converted to other than public outdoor recreation uses without the approval of NPS pursuant to Section 6(f)(3) of the LWCF Act." While this letter is primarily a response to the VDOT's Section 4(f) request letter, FCPA will continue to coordinate with the project team on the required Section 6(f) replacement land process and procedure as noted on Attachment 3, "Proposed Mitigation and Minimization," Bullet 5.

12055 Government Center Parkway  
Fairfax, VA 22035-5500  
[www.fairfaxcounty.gov/parks](http://www.fairfaxcounty.gov/parks)  
f t i @fairfaxparks

For Inclusion and ADA Support,  
 call (703) 324-8563.  
TTY: Va Relay 711

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Mr. Abraham Lerner, P.E.  
I-495 Express Lanes Northern Extension (Project NEXT); UPC Number 113414  
Page 2

The FCPA appreciates that VDOT staff has worked closely with FCPA staff to reach 4(f) de minimis concurrence under Section 4(f) of the Department of Transportation Act of 1966 for the I-495 NEXT Project. Based on VDOT's assurance to utilize FCPA's specified mitigation as stated in your request dated March 25, 2021, the executed Section 4(f) concurrence regarding De Minimis Impacts on FCPA Parklands and the Proposed Mitigations and Minimizations is attached. These documents have been amended with clarifications and corrections as discussed with VDOT staff in recent weeks. These edits are noted as underlined text in Attachments 2 and 3. As further engineering and design demonstrate any additional park impacts and land takings, additional studies and concurrences may be necessary. Costs associated with all land acquisitions including temporary and permanent easements and takings will need to be negotiated at a later date, separate from this Section 4(f) concurrence. FCPA staff is committed to work with VDOT staff to keep this important project on schedule with the understanding that VDOT will continue to coordinate with FCPA during project design and construction.

The staff contact for this project is Elizabeth Iannetta, Infrastructure Project Coordinator, who can be reached at 703-324-8725 or [Elizabeth.Iannetta@fairfaxcounty.gov](mailto:Elizabeth.Iannetta@fairfaxcounty.gov). We look forward to working with you as this project progresses.

Sincerely,

DocuSigned by:  
  
66B09FAA5613421...  
Sara Baldwin  
Acting Executive Director/COO

Attachment 1: Scotts Run Nature Preserve Impact Area  
Attachment 2: FCPA Section 4(f) Signature Block (as amended)  
Attachment 3: Proposed Mitigation and Minimization  
Attachment 4: Proposed Trail Network Connecting to Scotts Run Nature Preserve

eCopy: Aimee Vosper, Deputy Director/CBD  
Stephanie Leedom, Director, Park Planning & Development Division, PDD  
Anna Bentley, Manager, Park Planning Branch, PDD  
Andrea Dorlester, Development Review Section Chief, Park Planning Branch, PDD  
Elizabeth Iannetta, Trails & Infrastructure Coordinator, Park Planning Branch, PDD  
Cindy McNeal, Project Coordinator, Real Estate Services Branch, PDD  
Lynne Johnson, Planning Tech, Park Planning Branch, PDD  
John Burke, Manager, Natural Resources Branch, RMD  
Erin Stocksclaeder, Natural Resources Branch, RMD  
Liz Crowell, Manager, Archaeology & Collections Branch, RMD  
Dan Sutherland, Manager, Grounds Management, Park Operations Division  
Wayne Brissey, Area 6 Manager, Park Operations Division  
John Callow, Manager, Scotts Run Nature Preserve, RMD  
John Simkins, FHWA  
Susan Shaw, P.E., VDOT  
Scott Smizik, VDOT  
Martha Coello, FCDOT

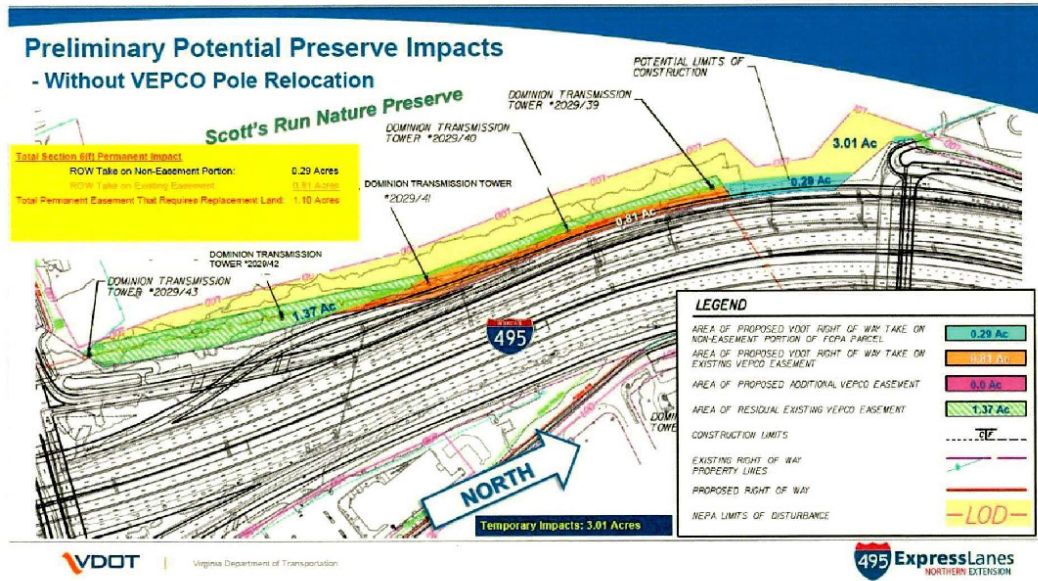


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Mr. Abraham Lerner, P.E.  
I-495 Express Lanes Northern Extension (Project NEXT); UPC Number 113414  
Page 3

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ATTACHMENT 1

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**ATTACHMENT 2**

**Fairfax County Park Authority Significance Determination, Temporary Occupancy, and Final Concurrence with the Section 4(f) Applicability Criteria for *de minimis* Impact to Scotts Run Nature Preserve**

For the proposed northern extension of Interstate 495 (VDOT Project #0495-029-419, P101, UPC #113414) from the current northern terminus of the existing Express Lanes in the vicinity of the Old Dominion Drive overpass to the George Washington Memorial Parkway (GWMP) in the McLean area of Fairfax County, Virginia, the Fairfax County Park Authority (FCPA) has determined that the Scotts Run Nature Preserve (Preserve) is a significant property in their system. FCPA concurs that the temporary occupancy of 3.01 acres for grading and construction is minor and will not cause permanently adverse physical impacts to, nor interfere with the protected activities, features, or attributes of the Preserve that qualify it for protection under Section 4(f), either on a temporary or permanent basis. FCPA further concurs that the fee simple right-of-way acquisition of approximately 1.10 acres of property will not permanently adversely affect the Preserve, as the majority of the fee simple acquisition is co-located with an existing overhead Dominion Energy transmission line that is within an existing easement. FCPA further concurs that, based upon current design information and the commitment on the part of VDOT to mitigate and minimize disturbance within the Preserve, subject to the conditions attached to this concurrence document and incorporated as Attachment 3, impacts to Preserve property that could be expected to result from the project will not adversely affect activities, features, or attributes of the Preserve. FCPA hereby acknowledges that VDOT provided notice and opportunity for public review and comment, consistent with federal guidelines. This concurrence does not constitute an endorsement of the project or conveyance of any temporary or permanent interests in or access to the Preserve. This concurrence is provided with the understanding that further design information is to be provided to FCPA by VDOT during project development and that further consultation with FCPA will be undertaken by VDOT to ensure prior to granting of any temporary or permanent property interests that harm to park property by the proposed project will be minimized and the conditions upon which this concurrence is based have not changed.

DocuSigned by:  
Sara Baldwin  
66809FAA5613421...  
Signature \_\_\_\_\_ 05/17/2021  
Date \_\_\_\_\_

Sara Baldwin  
Printed Name

Acting Executive Director/COO, FCPA  
Title

### ATTACHMENT 3

#### PROPOSED MITIGATION AND MINIMIZATION

VDOT will adhere to the following minimization efforts and mitigation measures for the Scott's Run Nature Preserve:

- VDOT will avoid impacts to the recreational use of the property so that the project will not adversely affect activities, features, or attributes of the Scott's Run Nature Preserve.
- VDOT will minimize potential encroachment into Scott's Run Nature Preserve by staying within utility easement, to the extent possible, within the boundaries of the Scott's Run Nature Preserve.
- VDOT commits to providing FCPA design plans to review as the project progresses through the Design-Build process following completion of the NEPA process. VDOT expects these plans to be reviewed by the FCPA within three weeks of submittal.
- VDOT agrees to return any areas with temporary construction impacts on FCPA land to its pre-construction condition (like to like).
- VDOT commits to mitigation/compensation for impacts to those areas outside of the required replacement land area. The permanent fee simple area will be compensated with replacement land.
- VDOT agrees to mitigate/compensate for permanent impacts to natural resources on FCPA managed lands. This requirement shall apply to any natural resource impact (terrestrial or aquatic) that is not regulated under the jurisdiction of any federal or state agency.
- VDOT will stabilize the construction footprint with native seed mix. Once construction is complete, FCPA will rehabilitate these areas to the habitat type based on whether it is a temporary or permanent impact. VDOT will compensate FCPA to design, install and maintain these rehabilitated areas for up to three (3) years.
- The Design-Build Team will be required to follow FCPA Policy Manual guidance. FCPA Policy 201: Natural and Cultural Resources will also be referenced in the Technical Requirements of the Design Build Request for Proposals for the project.
- The Technical Requirements of the Design-Build Request for Proposals will include the LOD as a design constraint. Any design changes that extend beyond the LOD that was previously coordinated will require further consultation with the SHPO (VDHR), the OWJ, FHWA, and other consulting parties as necessary.
- As part of the overall design for the I-495 NEXT project design, the Build Alternative includes an approximately 3.1-mile, 10-foot-wide shared use path, consistent with the Fairfax County Countywide Trails Plan Map (FCDPD 2018) that would provide improved local access to the Scott's Run Nature Preserve trail system (see Attachment 4). The path is proposed to begin near the south end of the project corridor at Timberly Lane near Lewinsville Road and continue north along the west side of I-495 behind the proposed noise barrier. The path would also have a connection to existing and proposed bicycle and pedestrian facilities along Georgetown Pike, tying in just west of the Georgetown Pike interchange. The path is proposed to then cross I-495 on the south side of the proposed Georgetown Pike bridge and turn north at the Balls Hill Road intersection where it would continue along the west side of Balls Hill Road to the GWMP interchange. The northern



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### ATTACHMENT 3

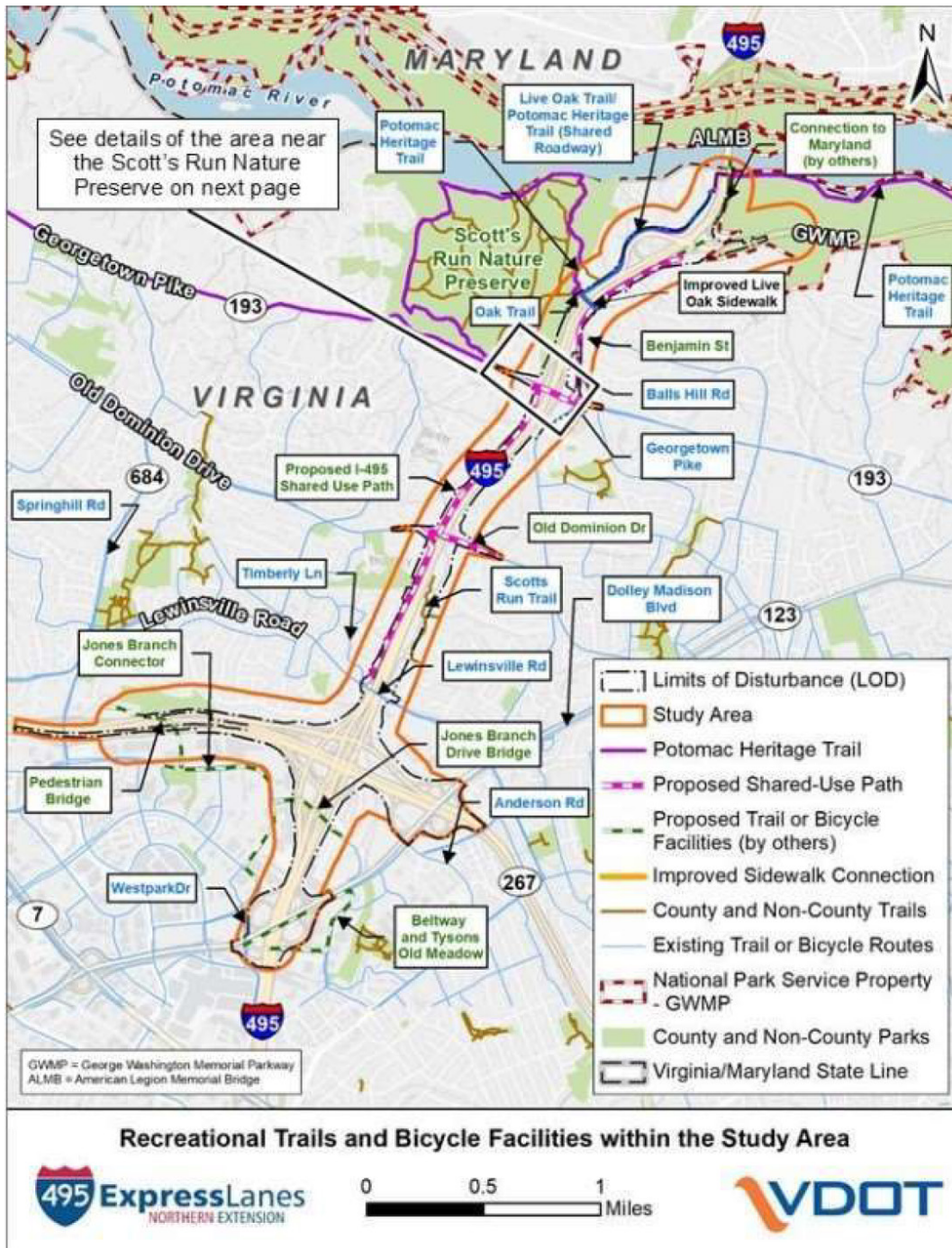
limits of the path would be constructed so that it may connect in the future to a proposed pedestrian crossing of the Potomac River adjacent to the ALMB. The path would also provide access to the widened sidewalk on the new Live Oak Drive bridge where it crosses I-495 (just south of the GWMP interchange) and provide a connection to the trail system in Scott's Run Nature Preserve as well as the Potomac Heritage Trail.

- In order to provide a seamless connection between the proposed shared use path and Scott's Run Nature Preserve, VDOT will construct the following sidewalk and trail connections as part of the Build Alternative:
  - A new sidewalk along Georgetown Pike (north side) between the I-495 interchange and Linganore Drive will be constructed, connecting with the existing trail that leads to the main entrance of the preserve.
  - The Georgetown Pike Bridge will be widened, and a new sidewalk will be constructed on the north side of the I-495 Bridge and extend beyond the bridge to Balls Hill Road as well as to the I-495 proposed shared use path as described above.
  - Crosswalks will be constructed to connect to the I-495 proposed shared use path and new sidewalks on both sides of I-495, providing improved options for pedestrians and bicyclists to gain access to the existing trail west of Lignanore Drive leading to Scott's Run Nature Preserve.

Page 2 of 2

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**ATTCHMENT 4**





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**ATTCHMENT 4**



**Recreational Trails and Bicycle Facilities near the Scotts Run Nature Preserve**



## **Appendix B: Agency Scoping Correspondence**



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## I-495 Express Lanes Northern Extension - NEPA Scoping Questionnaire

1 message

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**Chad.Carper@faa.gov** <Chad.Carper@faa.gov>

Fri, Jul 20, 2018 at 10:49 AM

To: Robert.Iosco@vdot.virginia.gov

Cc: Matthew.Thys@faa.gov

Good Morning Mr. Iosco – Please find below the Federal Aviation Administration's (FAA) responses to the subject questionnaire transmitted with your June 25, 2018 letter.

1. Please provide input on potential effects to resources under your agency's jurisdiction that could occur as a result of the proposed project. Any pertinent reports or documents that may support your conclusions would be greatly appreciated.

*a. The proposed project will occur on property owned by the United States of America and leased to the Metropolitan Washington Airports Authority (Authority) via the attached lease. The proposed project is located outside the defined Airport boundary for Washington Dulles International Airport, but within the leased access highway. Please coordinate the proposed project with the Authority as the party responsible for all actions on the leased premises.*

2. Are there any airport security concerns associated with the proposed project?

*a. Please coordinate this question with the Authority.*

3. Would roadway construction equipment pose any air navigation hazards?

*a. Any equipment exceeding a height of two hundred feet (200') above ground level would require notification to FAA through the Obstruction Evaluation/Airport Airspace Analysis (OE/AAA) web portal using the "IS NOT LOCATED on an airport" option. <https://oeaaa.faa.gov/oeaaa/external/portal.jsp>*

4. Please provide information regarding any permits, authorizations, approvals, coordination, or review processes that may be required from your agency for this work.

*a. Please coordinate the project with the Authority, who will engage the FAA as needed.*

5. Please provide any other comments or feedback that you feel may be beneficial to the development of this study.

*a. No comment.*

Should you have any questions or need additional information, please do not hesitate to contact me.

Regards,

Chad

Chad Carper, Engineer

Washington Airports District Office

23723 Air Freight Lane, Suite 210

Dulles, VA 20166

703.661.1358 [chad.carper@faa.gov](mailto:chad.carper@faa.gov)



**Lease of IAD-DCA between USA & MWAA March 2, 1987 (Fully Executed including Amendments 1-4).pdf**  
1947K

July 25, 2018

Mr. Robert Iosco  
Virginia MegaProjects  
Virginia Department of Transportation  
4975 Alliance Drive  
Fairfax, VA 22030

RE: I-495 Express Lanes Northern Extension, Environmental Assessment  
Request for Environmental Scoping Comments, Fairfax County, Virginia  
VDOT Project Number: 0495-029-419, P101, UPC 113414

Dear Mr. Iosco:

Per your letter dated June 25, 2018 to Mr. John Potter regarding the referenced project, enclosed for your information are answers to your questionnaire requesting specific input on resources relevant to the Metropolitan Washington Airports Authority.

If you have any questions or need additional information, please contact Michael Hewitt at [Michael.Hewitt@mwa.com](mailto:Michael.Hewitt@mwa.com) or 703-572-0264.

Sincerely,



J. Brett Blanton, P.E., CEM  
Deputy Vice President  
Office of Engineering

JBB:mh:knh

Enclosure



Subject: I-495 Express Lanes Northern Extension  
NEPA Scoping Questionnaire, Fairfax County, Virginia  
State Project Number: 0495-029-419, P-101; UPC 113414  
Federal Project Number: NHPP-0495 (095)

1. Please provide input on potential effects to resources under your agency's jurisdiction that could occur as a result of the proposed project. Any pertinent reports or documents that may support your conclusions would be greatly appreciated.

***A: No potential effects on resources are anticipated as a result of this project.***

2. Are there any planned projects related to MWAA properties that may be affected by the proposed project?

***A: There are two projects that may be affected by the project:***

1. ***Widening of the Dulles Access Highway to 3 Lanes in each direction***
2. ***Construction of Ramp 3 as referenced in the Memorandum of Agreement between VDOT and MWAA for the improvement of access between the DTR and Dulles Access Highway and Capital Beltway dated May 7, 2010.***

3. Are there any environmental studies for MWAA properties pertinent for the study area?

***A: MWAA is not aware of any pertinent environmental studies for the study area.***

4. Are there any airport security concerns associated with the proposed project?

***A: No airport security concerns are anticipated for the proposed project.***

5. Would roadway construction equipment pose any air navigation hazards?

***A: No roadway construction equipment is anticipated to pose any air navigation hazards.***

6. Planning judgment is a structured process that will be used as part of this study to analyze and forecast potential indirect effects and cumulative impacts. Does your agency possess any reports, data sources, or expert input that you recommend be used to inform the use of planning judgement in this study? Additionally, any other tools or resources that your agency might be able to provide to aid in the identification of indirect effects and cumulative impacts would be appreciated and considered.

***A: MWAA is not aware of any reports, data sources, expert input, or tools that would inform the use of planning judgement or aid in the identification of indirect or cumulative impacts.***



7. Please provide information regarding any permits, authorizations, approvals, coordination, or review processes that may be required from your agency for this project.

***A: The project as described would not require an update to the Dulles Airport Layout Plan (ALP). VDOT would be required to meet all applicable E&S and stormwater management requirements, and will be responsible for coordinating with MWAA regarding any changes to the existing Dulles Toll Road MS4 stormwater discharge permit. If any work will occur on federal land under lease to MWAA, a construction permit from MWAA may be necessary. The process for a construction permit remains the same as with previous VDOT projects such as Route 7 Bridge Widening and Route 28 4 Lane Widening. MWAA appreciates the opportunity to review and comment on the project through each stage of development.***

8. Please provide any other comments or feedback that you feel may be beneficial to the development of this study.

***A: No other comments at this time.***

---

**Re: I-495 Express Lanes Northern Extension (I-495 NEXT) - VDOT Project # 0495-029-419, P101 - NEPA Scoping Follow-up Request**

1 message

---

**Karen Greene - NOAA Federal** <[karen.greene@noaa.gov](mailto:karen.greene@noaa.gov)>

Wed, Aug 8, 2018 at 3:01 PM

To: "Iosco, Robert" <[robert.iosco@vdot.virginia.gov](mailto:robert.iosco@vdot.virginia.gov)>Cc: David O'Brien <[david.l.o'brien@noaa.gov](mailto:david.l.o'brien@noaa.gov)>, Brian D Hopper - NOAA Federal <[brian.d.hopper@noaa.gov](mailto:brian.d.hopper@noaa.gov)>

Hello Robert,

I have discussed this project with Habitat Division staff. From the information provided, it does not appear any aquatic resources under are jurisdiction will be affected by the project. As a result, we do not have any scoping comments at this time nor do we possess any information, data or reports that would assist in the analysis of effects. If any wetlands will be affected by this project, or if there are any water crossings or in-water work of which we are not aware, please let us know.

NOAA staff generally participate in in interagency VDOT meetings where projects such as this are discussed, and we will continue to do so. We are also available to discuss the project with you should in water work be proposed. We will also coordinate with the lead federal action agency or its non-federal designee to undertake consultations under our various authorities including the Magnuson Steven Fishery Conservation and Management Act and the Fish and Wildlife Coordination Act should the project impact fishery resources under our jurisdiction or their habitats.

David O'Brien in our Virginia field office is the primary point of contact for this project. He will be out of the office until August 22, 2018. If you have any questions before then or wish to discuss this project and our response, please don't hesitate to contact me.

Thank you.

Karen

Karen Greene  
Mid-Atlantic Field Offices Supervisor  
NOAA/National Marine Fisheries Service  
Greater Atlantic Regional Fisheries Office  
Habitat Conservation Division  
James J. Howard Marine Sciences Laboratory  
[74 Magruder Rd.](#)  
[Highlands, NJ 07732](#)  
732 872-3023 (office)

---

On Fri, Aug 3, 2018 at 12:51 PM, Iosco, Robert <[robert.iosco@vdot.virginia.gov](mailto:robert.iosco@vdot.virginia.gov)> wrote:

Thank you!

Robert Iosco  
Special Project Development  
Virginia Department of Transportation  
Northern Virginia District  
[4975 Alliance Drive](#)  
[Fairfax, VA 22030](#)

Email: [Robert.Iosco@VDOT.Virginia.gov](mailto:Robert.Iosco@VDOT.Virginia.gov)  
Telephone: 703-259-2764

On Fri, Aug 3, 2018 at 8:13 AM, Karen Greene - NOAA Federal <[karen.greene@noaa.gov](mailto:karen.greene@noaa.gov)> wrote:

Hello,

I will look into the status of the response and get it to you early next week. I apologize for the delay.

Thank you.

Karen Greene  
Mid-Atlantic Field Offices Supervisor  
NOAA/National Marine Fisheries Service  
Greater Atlantic Regional Fisheries Office  
Habitat Conservation Division  
James J. Howard Marine Sciences Laboratory  
[74 Magruder Rd.](#)  
[Highlands, NJ 07732](#)  
732 872-3023 (office)

On Thu, Aug 2, 2018 at 5:16 PM, losco, Robert <[robert.iosco@vdot.virginia.gov](mailto:robert.iosco@vdot.virginia.gov)> wrote:

Dear Sir or Madam:

Pursuant to the requirements of the National Environmental Policy Act (NEPA) and related implementing regulations, VDOT, on behalf of the Federal Highway Administration (FHWA), is conducting an environmental review of the project referenced above. Your office or agency should have recently received a NEPA scoping letter and questionnaire requesting input based on your agency's area of expertise. Your comments and special knowledge are very important to the development of our study.

If you have already responded, thank you! If you have not, your timely response to the letter and questionnaire would be greatly appreciated. If you would like additional information or have any questions, please feel free to contact me.

Sincerely,

Robert losco  
Special Project Development  
Virginia Department of Transportation  
Northern Virginia District  
[4975 Alliance Drive](#)  
[Fairfax, VA 22030](#)

Email: [Robert.iosco@VDOT.Virginia.gov](mailto:Robert.iosco@VDOT.Virginia.gov)  
Telephone: 703-259-2764

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**I-495 Express Lanes Northern Extension NAO-2006-07042**

1 message

**Fuerst, Lee A CIV USARMY CENAO (US)** <Lee.A.Fuerst@usace.army.mil>

Tue, Jul 17, 2018 at 10:08 AM

To: "Simkins, John (FHWA)" &lt;John.Simkins@dot.gov&gt;

Cc: "losco, Robert" &lt;robert.losco@vdot.virginia.gov&gt;, "Okorn, Barbara" &lt;Okorn.Barbara@epa.gov&gt;, "alison\_whitlock@fws.gov" &lt;alison\_whitlock@fws.gov&gt;, "MARC.HOLMA@DHR.VIRGINIA.GOV" &lt;MARC.HOLMA@dhr.virginia.gov&gt;, "Prisco-Baggett, Kimberly A CIV USARMY USACE (US)" &lt;Kimberly.A.Baggett@usace.army.mil&gt;

Dear Mr. Simkins,

Attached please find USACE's response to the request to be a cooperating agency, federal lead agency designation, and scoping comments for the I-495 Express Lanes Northern Extension study. In addition, please find USACE's response to the questionnaire.

Please do not hesitate to contact me should you have any questions. We appreciate the opportunity to comment and look forward to working with you on this study.


Thank you.

Sincerely,

Lee A Fuerst  
Environmental Scientist  
U.S. Army Corps of Engineers  
Norfolk District Regulatory Branch  
803 Front Street, Norfolk, VA 23510  
Office 757-201-7832 / Cell 757-536-5954

The Norfolk District is committed to providing the highest level of support to the public. In order for us to better serve you, we would appreciate you completing our Customer Satisfaction Survey located at [http://corpsmapu.usace.army.mil/cm\\_apex/f?p=regulatory\\_survey](http://corpsmapu.usace.army.mil/cm_apex/f?p=regulatory_survey). We value your comments.

---

**2 attachments** **USACE comments NAO-2006-07042 I-495 Northern Express Lanes N. Ext.pdf**

82K

 **USACE response to questions I-495 Exp. Lanes Northern Ext. Study.pdf**

791K





Reply to  
Attention of

**DEPARTMENT OF THE ARMY  
US ARMY CORPS OF ENGINEERS  
NORFOLK DISTRICT  
FORT NORFOLK  
803 FRONT STREET  
NORFOLK VA 23510-1011**

July 17, 2018

Special Projects Virginia Regulatory Section  
NAO-2006-07042, I-495 Express Lanes Northern Extension Study  
Federal Project Number: NHPP-0495 (095)  
State Project Number: 0495-029-419, P101; UPC: 113414

Mr. John Simkins  
Planning/Environmental Team Leader  
Federal Highway Administration, Virginia Division  
400 North 8<sup>th</sup> Street, Suite 750  
Richmond, Virginia 23219-4825

Dear Mr. Simkins:

This letter is in response to a letter dated June 25, 2018 received from Mr. Robert Losco of the Virginia Department of Transportation (VDOT) Northern Virginia District, soliciting scoping comments for a study to be undertaken to evaluate an extension of the I-495 Express Lanes. The study area would evaluate an extension to be located between the northbound and southbound general purpose lanes, for approximately three miles north from the Dulles Toll Road (VA 267) to the George Washington Memorial Parkway (GWMP) in Fairfax County, Virginia. In accordance with the National Environmental Policy Act (NEPA), an Environmental Assessment (EA) is being prepared with the Federal Highway Administration (FHWA) as the lead federal agency and VDOT as the Joint Lead Agency to FHWA.

It is likely the project will impact waters and/or wetlands regulated by the Norfolk District Army Corps of Engineers (USACE) under Section 10 of the Rivers and Harbors Act of 1899 and/or Section 404 of the Clean Water Act (33 U.S.C. 1344), and a permit or permits will likely be required for the improvements. The proposed project EA according to your letter will evaluate a single build and a no-build alternative. USACE still requires a thorough and robust alternatives analysis to ensure that all measures practicable have been incorporated to avoid and minimize any potential impact to wetlands and/or waters of the U.S.

USACE will participate as a cooperating agency in the preparation of the Environmental Assessment (EA). We recommend coordination with the Cooperating Agencies of draft sections of the EA prior to publishing the document. Such coordination will help to minimize future delays or problems that

can be addressed earlier in the process. We wish to participate in any interagency meetings and field reviews for this project to the extent possible.

We would like to emphasize that before you develop and evaluate the build alternative, waters and wetlands should be identified and mapped, and you should document how impacts to aquatic resources are avoided and minimized by the preliminary alternatives you identify. The project is proposed as a single build alternative; however, USACE recommends following a process similar to the NEPA Merged Process for Highway Projects in Virginia in regards to level of detail for review, data needs for various project milestones, and regular coordination with the appropriate state and Federal agencies.

While USACE recommends a jurisdictional determination, you should consider, at a minimum, all available information such as aerial photography, U.S.G.S. quad sheets, National Wetland Inventory (NWI) maps, and soil mapping of the study area, as well as review of aerial photography (including color infrared aeriels) by a qualified reviewer. Should FHWA and/or VDOT perform the assessment of jurisdictional areas through remote sensing, USACE recommends field verification of any areas which FHWA and/or VDOT notes need further evaluation. The more accurate the delineation, the better for the purposes of alternative analysis and project development that incorporates avoidance and minimization of aquatic resources.

USACE understands that due to the purpose of improving an existing interstate system within a highly developed area, alternative options may be constrained; however, given a single build alternative does not preclude the examination of other measures incorporated into the development of the design that could be utilized to avoid and minimize any potential impacts to aquatic resources. Measures to avoid and minimize impacts to streams and wetlands, such as bridging and alignment shifts, should be incorporated wherever practicable, and the environmental document should discuss avoidance and minimization measures considered. VDOT should coordinate with local VDOT district office to insure all former mitigation sites in the vicinity of the project have been identified. Relocation of streams and any impacts to mitigation sites should be avoided.

Our regulations require that we consider a full range of public interest factors and conduct an alternatives analysis in order to identify the least environmentally damaging practicable alternative (LEDPA), which is the only alternative we can authorize.

In addition to wetland and waters impacts, we must consider factors such as land use (including displacements of homes and businesses), floodplain hazards and values, water supply and conservation, water quality, safety, cost, economics, threatened and endangered species, historic and cultural resources, and environmental justice.

Identifying potential compensation for stream and wetland impacts early in the process of project development is critical. Wetland impacts are typically compensated at 2:1 for forested, 1:5:1 for scrub/shrub, and 1:1 for emergent. Typically, we require stream compensation for unavoidable stream impacts to greater than 300 linear feet of stream at a crossing. However, we also consider the cumulative impacts to streams from a given project, and may require compensation for shorter lengths of stream if there are many impacts at close proximity, or if there are multiple impacts to the same stream and/or its direct tributaries. USACE would consider all impacts at an interchange to be part of a single and complete project. We encourage natural channel design to the extent practicable for streams that must be relocated. We utilize the Unified Stream Methodology for determining how much stream compensation is required for projects. The use of mitigation bank credits or Virginia Aquatic Resources Trust Fund released credits within the watershed are the preferred methods for providing compensation for stream and wetland impacts. This proposed study area encompasses one watershed, Middle Potomac-Catoctin, HUC 02070008.

As part of the Corps of Engineers designation of lead federal agency authority, please note the following:

The proposed project may affect historic and cultural resources. Many projects funded by the Federal Highway Administration (FHWA) require permits from the Corps of Engineers. These projects are subject to compliance with Section 106 of the National Historic Preservation Act of 1966.

According to 36 CFR 800.2(a)(2):

*"...If more than one Federal agency is involved in an undertaking, some or all [of] the agencies may designate a lead Federal agency, which shall identify the appropriate official to serve as the agency official who shall act on their behalf, fulfilling their collective responsibilities under section 106. Those Federal agencies that do not designate a lead Federal agency remain individually responsible for their compliance with this part."*

Pursuant to the above provision, FHWA is hereby designated as the lead federal agency to fulfill the collective Federal responsibilities under Section 106 for the following undertaking:

I-495 Express Lanes Northern Extension Study (UPC: 113414)

The Corps authorizes FHWA to conduct Section 106 coordination on its behalf, including all required tribal coordination. Any Memorandum of Agreement prepared by FHWA under 36 CFR 800.6 should include the following clause in the introductory text:

*"WHEREAS, pursuant to Section 10 and/or Section 404 of the Clean Water Act, a Department of the Army permit will likely be required from the Corps of Engineers for this project, and the Corps has designated FHWA as the lead federal agency to fulfill federal responsibilities under Section 106; and*

In accordance with 50 CFR 401.07, FHWA is also designated as the lead Federal agency for consultation with the U. S. Fish and Wildlife Service and the National Marine Fisheries Service (NMFS) concerning potential effects to Federally-listed threatened and endangered species.

In addition, FHWA is designated as the lead Federal agency for consultation with NMFS for Essential Fish Habitat, as required under Section 305(b)(2) of the Magnuson Stevens Fishery Conservation and Management Act.

We appreciate your consideration including USACE in the early planning stages of this study and look forward to working with you.

Should you have any questions, you may contact Lee Fuerst at 757-201-7832 or [lee.fuerst@usace.army.mil](mailto:lee.fuerst@usace.army.mil).

Sincerely,



Kimberly A. Prisco-Baggett, MBA  
Chief, Special Projects Section

cc:  
Virginia Department of Transportation  
Virginia Department of Historic Resources  
U.S. Environmental Protection Agency  
U.S. Fish and Wildlife Service



July 17, 2018

USACE Norfolk District  
Special Projects Virginia Regulatory Section  
NAO-2006-07042, I-495 Express Northern Extension Lanes Study  
Federal Project Number: NHPP-0495(095)  
State Project Number: 0495-029-419, P101; UPC: 113414

RE: Scoping Questionnaire Response

In response to a list of questions with your letter dated June 25, 2018, and we have the following responses, which pertain only to aquatic resources:

1. We recommend that in establishing a study area boundary for analyzing indirect and cumulative effects, you include an area of sufficient size to include any indirect downstream effects, such as potential water quality effects from roadway runoff, as well as cumulative effects the watershed has experienced. You may find that the boundary of the entire watershed is needed to sufficiently address these effects to aquatic resources. You should obtain information regarding impaired waters in the region and ascertain the basis for their designation as impaired, which may provide helpful information for establishing a geographic study area for your analysis of potential indirect and cumulative effects to streams. In determining a timeframe for evaluating cumulative effects, we recommend you consider the dates of construction of the interstate systems and any adjacent highways that are within and adjacent to the study area in setting a past date.
2. There are valid permits as well as the potential for preliminary jurisdictional determinations of delineated wetlands and/or waters of the U.S. within the proposed project area. We can provide VDOT with a record of impacts from authorized projects in the watershed, although the data are incomplete and most accurate only back to about 2007. At such time as you are conducting your cumulative effects analysis, if you will contact us we will provide the most current information. Attached are three maps of permitted projects within the proposed study area to include their USACE number, as currently found in our database. It should be noted that the location shown may not be accurate, especially for older project numbers. Should VDOT require additional documentation, such as jurisdictional determinations, on any of these permitted projects within the study area, a Freedom of Information Act (FOIA) request would be required to be submitted. Instructions on how to submit a FOIA request can be viewed at: <http://www.nao.usace.army.mil/Library/Freedom-of-Information-Act/>  
Alternatively, any permitted projects and their corresponding applications

that were received and processed through the Virginia Marine Resources Commission, can be viewed on its publically available website.

We recommend coordination with local VDOT district offices to insure identification of any mitigation sites and/or preservation sites within the study area.

3. We have no specific comments at this time regarding potential induced growth, economic development and investment, or improved stormwater management but we agree that such effects should be considered as you develop your study. When developing your stormwater management plan, all stormwater facilities should be located outside of jurisdictional areas.
4. As part of your planning judgement process, we request that you coordinate with USACE and other federal agencies regarding the methodologies you propose to use for identifying resources for both direct and indirect impact analysis as well as the cumulative effects analysis. We do not have any tools to share that would be of use in indentifying indirect and cumulative effects other than our Regulatory database, from which we can provide some information about authorized impacts (as noted above). We recommend you refer to Virginia's record of identified impaired waters as one indicator of cumulative effects to surface waters. You may also wish to refer to the Virginia Department of Environmental Quality's WetCat program which will provide information regarding the condition of wetlands in the watershed, which can serve as an indicator of cumulative effects.
5. It is difficult to assess the level of permitting and/or authorization that might be required at this time until the study develops further and USACE has a clearer indication of the potential impacts (if any) to aquatic resources within our jurisdiction. We recommend coordination with the draft sections of the EA prior to publishing the document. The study is proposed as a single build alternative; however, USACE recommends that following a process similar to the NEPA Merged Process for Highway Projects in Virginia in regards to level of detail for review, data needs for various project milestones, and regular coordination with the appropriate state and Federal agencies during the planning and EA review stages could help to expedite potential permitting requirements.
6. We have no further comments at this time other than those included above in this letter.





Tysons



Nature Preserve

16-0-1



Swinks Mill

NAO-2014-00400-tca

NAO-2016-01545

NAO-2007-01559

NAO-2010-01092-tca

041949-03294

NAO-2019-01611-tca

495

02070008

NAO-2001-01565

Broyhill-Langley Estates

NAO-20

NAO-2012-01018-tca

NAO-2014-00166-tca

West Langley

NAO-2018-00040-tca

NAO-2012-02349-tca

Elmwood Estates

OLD DOMINION DR

CHURCHILL RD

CAPITOL VIEW DR

CAPITOL VIEW DR

Old Dominion

NAO-2014-00682-tca

Gardens

ELIZABETH DR

ELIZABETH DR

NAO-2011-00762-tca

NAO-2016-00116-tca

NAO-2002-01576

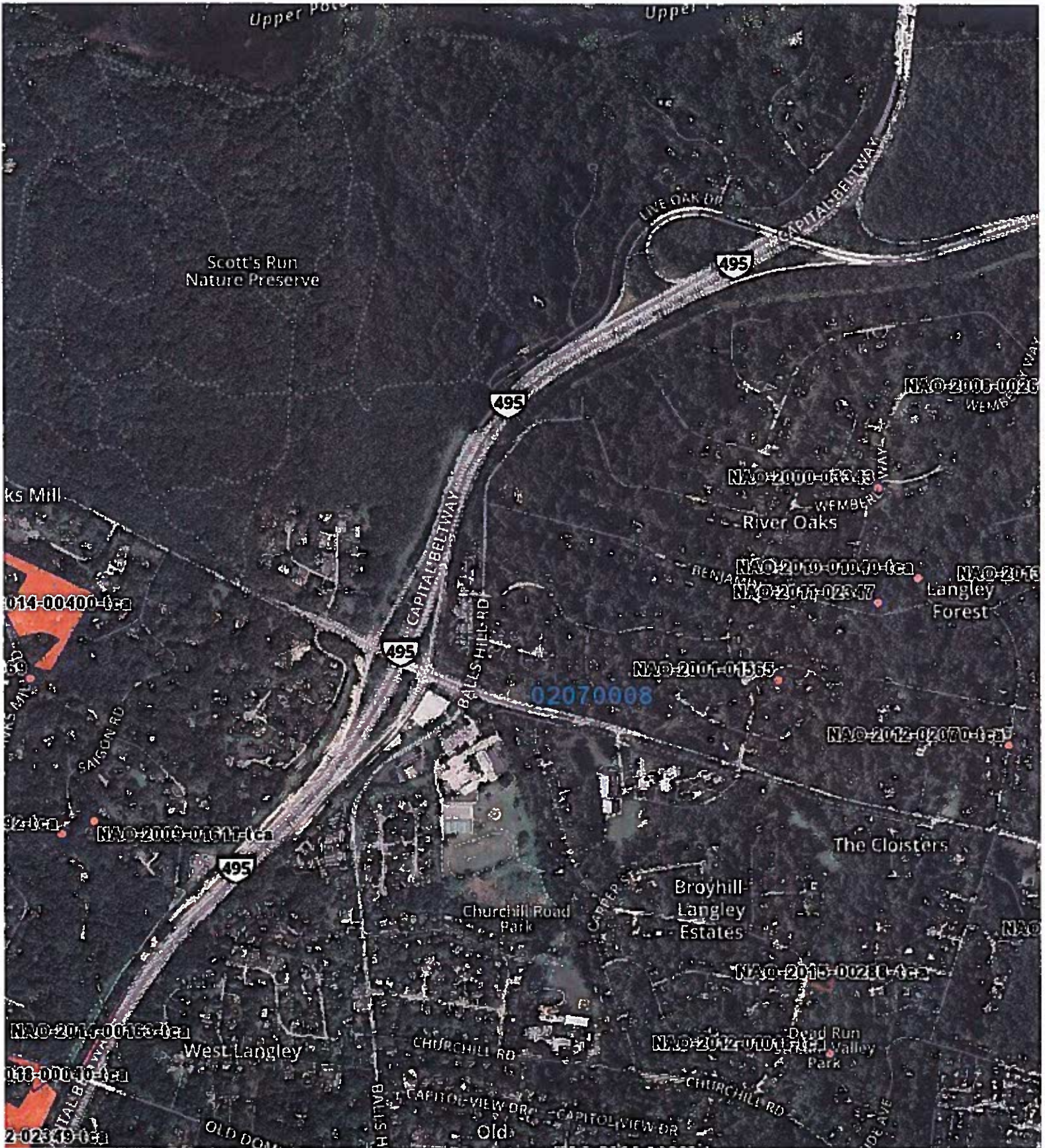
NAO-2005-02416

NAO-2007-03176-tca

DUNLANY DR

McLean Central Park





Scott's Run Nature Preserve

495

495

495

495

02070008

NAO-2006-0026

NAO-2000-0343

NAO-2010-01070-1ca

NAO-2011-02347

NAO-2016

Langley Forest

NAO-2001-01565

NAO-2012-02070-1-1a

NAO-2009-01611-1ca

The Cloisters

Broyhill Langley Estates

NAO-2015-00210-1ca

NAO-2012-01011-1ca

NAO-2014-00163-1ca

West Langley

Dead Run Valley Park

NAO-2012-00070-1ca

NAO-2023-0031

Upper Potomac

Upper Potomac

LIVE OAK DR

CAPITAL BELTWAY

CAPITAL BELTWAY

BALLS HILL RD

Churchill Road Park

CHURCHILL RD

CAPITOL VIEW DR

CAPITOL VIEW DR

CHURCHILL RD

OLD DOM

H STIVB

WIDE AVE

KS Mill

014-00400-1ca

NAO-2011-01611-1ca

NAO-2012-00070-1ca

NAO-2023-0031



Subject: I-495 Express Lanes Northern Extension – NEPA Scoping Questionnaire  
Fairfax County, Virginia  
State Project Number: 0495-029-419, P101; UPC: 113414  
Federal Project Number: NHPP-0495 (095)

1. Would the proposed project affect any prime or unique farmland?  
This area is already dedicated to urban and would not be considered prime or unique farmland.
  
2. Would the proposed project affect erosion and stormwater runoff? If so, what recommendation do you have for alleviating the anticipated problem?  
Yes, the proposed project will increase potential soil erosion, and stormwater runoff.
  
3. Do you have any other concerns regarding soil and water conservation in connection with this project?  
No others are known @ this time.
  
4. Are there any foreseeable problems regarding reseeding or landscaping?  
Yes, I would recommend the use of straw mulches , and/or the use of temporary nurse crops of small grains , until permanent seedings can become established.
  
5. Do you anticipate any detrimental impact or effect on groundwater?  
No none known @ present.
  
6. Do you anticipate any adverse effect on flooding and, if so, would you have any recommendations for alleviating the anticipated problem?  
Holding & sediment basins to store , and slow release of stormwater from pavement.
  
7. Please provide information regarding any permits, authorizations, approvals, coordination, or review processes that may be required from your agency for this project.  
No permits, from NRCS , USDA , we are not an enforcement agency.
  
8. Please provide any other comments or feedback that you feel may be beneficial to the development of this study.  
No, other comments at this time.



## Stratton, Samantha

---

**From:** rachel\_case@fws.gov on behalf of Virginia Field Office, FW5  
<virginiafieldoffice@fws.gov>  
**Sent:** Thursday, January 9, 2020 9:31 AM  
**To:** Stratton, Samantha  
**Subject:** Re: [EXTERNAL] Project Review: I-495 NEXT UPC #113414 - Fairfax County, VA

**Categories:** External

Hi Samantha,

We have no further comments on this project. For future reference, if the northern long-eared bat (NLEB) is the only species on your Official Species List, and you have utilized the determination key for this species--you do not need to submit anything to our office for review; the verification letter generated by that key fulfills your section 7 requirements with our office. Moreover, if you do have additional species, aside from the NLEB, you will need to submit a project package.

All the best,  
Rachel

On Wed, Jan 8, 2020 at 11:48 AM Stratton, Samantha <[Samantha.Stratton@kimley-horn.com](mailto:Samantha.Stratton@kimley-horn.com)> wrote:

Rachel,

Please confirm that your agency has no further comment on our determinations regarding this project.

Thank you,

**Samantha Stratton** | Environmental Analyst  
**Kimley-Horn** | 11400 Commerce Park Drive Suite 400 Reston, VA 20191  
Direct: 703 462 2706 | [www.kimley-horn.com](http://www.kimley-horn.com)

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**From:** Stratton, Samantha  
**Sent:** Tuesday, November 26, 2019 3:45 PM  
**To:** Virginia Field Office, FW5 <[virginiafieldoffice@fws.gov](mailto:virginiafieldoffice@fws.gov)>; [rachel\\_case@fws.gov](mailto:rachel_case@fws.gov)  
**Subject:** RE: [EXTERNAL] Project Review: I-495 NEXT UPC #113414 - Fairfax County, VA

Hi Rachel,

We're in NEPA right now and we're not sure of impacts yet, but it can be preliminarily assumed that all 103 acres in the LOD will be cleared. I also have attached the NLEB determination key to this email for your reference.

Thank you,

**Samantha Stratton** | Environmental Analyst  
**Kimley-Horn** | 11400 Commerce Park Drive Suite 400 Reston, VA 20191  
Direct: 703 462 2706 | [www.kimley-horn.com](http://www.kimley-horn.com)

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**From:** [rachel\\_case@fws.gov](mailto:rachel_case@fws.gov) <[rachel\\_case@fws.gov](mailto:rachel_case@fws.gov)> **On Behalf Of** Virginia Field Office, FW5  
**Sent:** Tuesday, November 26, 2019 2:57 PM  
**To:** Stratton, Samantha <[Samantha.Stratton@kimley-horn.com](mailto:Samantha.Stratton@kimley-horn.com)>  
**Subject:** Re: [EXTERNAL] Project Review: I-495 NEXT UPC #113414 - Fairfax County, VA

Samantha,

Thank you for your project submission. Will this project require any tree removal?

Regards,

Rachel

On Thu, Nov 21, 2019 at 7:55 PM Stratton, Samantha <[Samantha.Stratton@kimley-horn.com](mailto:Samantha.Stratton@kimley-horn.com)> wrote:



## Citrix Attachments

Expires May 19, 2020

495\_AllUSFWS\_111919.pdf

29.2 MB

Download Attachments

Samantha Stratton uses Citrix Files to share documents securely.

On behalf of Robert Losco ([Robert.losco@vdot.virginia.gov](mailto:Robert.losco@vdot.virginia.gov), (703) 259-2764) at the Virginia Department of Transportation (VDOT):

We have reviewed the referenced project using the Virginia Field Office's online project review process and have followed all guidance and instructions in completing the review. We completed our review on November 19, 2019 and are submitting our project review package in accordance with the instructions for further review.

The Virginia Department of Transportation (VDOT), in coordination with the Federal Highway Administration (FHWA) as the lead federal agency, is evaluating an extension of the Interstate 495 (I-495) Express Lanes between Tysons and the Virginia State Line. We are requesting your comments on potential effects to threatened and endangered species found within the study area in order to complete our technical reports for NEPA documentation. A project description can be seen below:

*The Build Alternative would extend the existing four I-495 Express Lanes from their current terminus between the I-495/Route 267 interchange and the Old Dominion Drive Overpass north approximately 2.3 miles to the George Washington Memorial Parkway (GWMP). Additional improvements are anticipated to extend approximately 0.3 miles north of the GWMP to provide a tie-in to the existing road network at the American Legion Memorial Bridge (ALMB). The Build Alternative would retain the existing number of general purpose (GP) lanes in each direction between the I-495/Route 267 interchange and the ALMB, consistent with the configuration of the existing I-495 Express Lanes. Direct access ramps would be provided from the I-495 Express Lanes to the Dulles Toll Road and the GWMP. Access would also be provided between the Express Lanes and GP lanes.*

According to USFWS IPaC, the Northern Long-Eared Bat (*Myotis septentrionalis*) is listed as a species of concern for the project. No winter hibernacula or maternity roosts were identified in the study area according to NLEB and MYLU & PESU Habitat Mappers, nor were any eagle nests identified on the CCB Bald Eagle Mapper. The enclosed project review package provides the information about the species, critical habitat, and bald eagles considered in our review, official species list, self-certification letter, and the species conclusions table which identifies our determinations for the resources that may be affected by the project. According to the 2016

Virginia Land Cover Dataset provided by the Virginia Geographic Information Network (VGIN) , there are 103 acres of forestland within our Limits of Disturbance (smaller than the study area shown in figures provided) that we are assuming will be impacted. Also attached are the database results and project mapping. Due to network issues on the USFWS IPaC website the Verification Letter for the NLEB Determination Key is not included in this packet, but will be sent as soon as possible.

We would appreciate your concurrence on our findings or any other comments USFWS may have.

Thank you,

**Samantha Stratton** | Environmental Analyst  
**Kimley-Horn** | 11400 Commerce Park Drive Suite 400 Reston, VA 20191  
Direct: 703 462 2706 | [www.kimley-horn.com](http://www.kimley-horn.com)

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**I-495 Express Lanes Northern Extension Environmental Assessment – Request for Environmental Scoping Comments, Fairfax County, Virginia, VDOT Project Number: 0495-029-419, P101, UPC 113414**

1 message

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**Whitlock, Alison** <alison\_whitlock@fws.gov>

Mon, Jul 2, 2018 at 2:49 PM

To: Robert.iosco@vdot.virginia.gov

Cc: Troy Andersen &lt;troy\_andersen@fws.gov&gt;, Cindy Schulz &lt;cindy\_schulz@fws.gov&gt;, "Golden, Amy (VDOT)" &lt;amy.golden@vdot.virginia.gov&gt;

Dear Mr. Iosco,

We recently received a letter regarding the subject project. We do not provide individual responses to requests for environmental reviews. Instead, we utilize an online project review process that can, if necessary and appropriate, lead to an individual response. The attached letter provides an overview of the process as well as a link to the process website. If you have additional questions regarding the process, don't hesitate to contact me.

Alison Whitlock

VDOT Liaison  
US Fish & Wildlife Service  
6669 Short Lane  
Gloucester, VA 23061

Cell: 804-815-1989  
Office Tel: 804-824-2410  
Office Fax: 804-693-9032  
Visit us at <http://www.fws.gov/northeast/virginiafield/>

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 **20151030\_Letter\_Service to Interested Parties\_Online Project Reviews SIGNED.pdf**  
370K



# United States Department of the Interior



## FISH AND WILDLIFE SERVICE

Virginia Field Office  
6669 Short Lane  
Gloucester, VA 23061

October 30, 2015

### Greetings:

Due to increased workload and refinement of our priorities in Virginia, this office will no longer provide individual responses to requests for environmental reviews. However, we want to ensure that U.S. Fish and Wildlife Service trust resources continue to be conserved. When that is not possible, we want to ensure that impacts to these important natural resources are minimized and appropriate permits are applied for and received. We have developed a website that provides the steps and information necessary to allow any individual or entity requiring review/approval of their project to complete a review and come to the appropriate conclusion. This site can be accessed at: <http://www.fws.gov/northeast/virginiafield/endangered/projectreviews.html>.

The website is frequently updated to provide new species/trust resource information and methods to review projects. Refer to the website for each project review to ensure that current information and methods are utilized.

If you have any questions about project reviews or need assistance, please contact Troy Andersen of this office at (804) 824-2428 or [troy\\_andersen@fws.gov](mailto:troy_andersen@fws.gov).

Sincerely,

Cindy Schulz  
Field Supervisor  
Virginia Ecological Services



Subject: I-495 Express Lanes Northern Extension — NEPA Scoping Questionnaire  
Fairfax County, Virginia  
State Project Number: 0495-029-419, P101; UPC: 113414  
Federal Project Number: NHPP-0495 (095)

**1. Would the proposed project affect any neighborhood programs, properties, or projects under the jurisdiction of the HUD DC Field Office?**

No. It does not appear that the I-495 Express Lanes Northern Extension will affect any neighborhood programs, properties or projects under the jurisdiction of the District of Columbia Field Office.

**2. Please provide input on potential positive and negative indirect effects that could occur as a result of the proposed project, such as: induced growth, economic development and investment, or improved storm-water management. Any pertinent reports or documents that may support your conclusions would be greatly appreciated.**

After review of the proposed project activity and the location for the proposed I-495 Express Lanes Northern Extension, the HUD District of Columbia Field Office finds the positive effect of the proposed project to be improved travel times on I-495 towards Maryland. Alternatively, the HUD District of Columbia Field Office cannot find any negative indirect effects that may occur resulting from improving the existing median of North-bound I 495 from the 267/I-495 exchange northward to the Maryland state line.

**3. In this scoping package we have provided a snapshot of recent economic and social data from the U.S. Census Bureau within the study area. Do you concur this data reflects the current population profile in the vicinity of the study area? Additionally, please identify locations within or adjacent to the study area where you feel potential minority or low-income Environmental Justice populations should be considered.**

The HUD District of Columbia Field Office, based on the census data presented, concurs the data appears accurate in terms of economic and social data. Based on the VDOT enclosed census income data compared to median income listings agrees that the target corridor does not appear to negatively impact any protected class communities as proposed.

**4. Please provide information regarding any permits, authorizations, approvals, coordination, or review processes that may be required from your agency for this project.**

There will be no permits, authorizations, approvals, review processes or coordination required from HUD for this above referenced proposed project.

**5. Please provide any other comments or feedback that you feel may be beneficial to the development of this study.**

Please let us know if any further questions come up. Thanks.



# United States Department of the Interior

NATIONAL PARK SERVICE  
National Capital Region  
1100 Ohio Drive, S.W.  
Washington, D.C. 20242

IN REPLY REFER TO:

L76 (NCRO-LP)

July 25, 2018

Mr. Robert Iosco  
Virginia MegaProjects  
VDOT Northern Virginia District  
4975 Alliance Drive  
Fairfax, Virginia 22030

RE: NPS Environmental Scoping Comments – I-495 Express Lanes Northern Extension Environmental Assessment

Dear Mr. Iosco:

The following is in response to your June 25, 2018 letter requesting National Park Service (NPS) feedback to the Virginia Department of Transportation for the I-495 Express Lanes Northern Extension Environmental Assessment. The NPS understands that the project will evaluate the extension of the I-495 Express Lanes, to be located between the northbound and southbound general purpose lanes, for approximately three miles north from the Dulles Toll Road (VA 267) to the George Washington Memorial Parkway in Fairfax County. Based on the project's proximity and potential impacts to two units of the national park system, the NPS requests Cooperating Agency status on this project. The units within the corridor include:

## **GEORGE WASHINGTON MEMORIAL PARKWAY**

The George Washington Memorial Parkway is a scenic roadway honoring the nation's first president that protects and preserves cultural and natural resources along the Potomac River below Great Falls to Mount Vernon. It is also a historic district listed in the National Register of Historic Places for its association with twentieth-century parkway design, engineering, landscape architecture, park planning and conservation, commemoration, and its association with George Washington.

A principal part of the legislated purpose of the George Washington Memorial Parkway is to protect the vistas and views along both sides of the Potomac River. The Parkway was the first comprehensively designed modern motorway built by the federal government based on the idea of a landscaped, park-like roadway corridor that protected riverfront lands and today includes an extension north to the capital beltway, as well as Spout Run Parkway and Clara Barton Parkway.

## **POTOMAC HERITAGE NATIONAL SCENIC TRAIL**

The Potomac Heritage National Scenic Trail is a developing network of locally managed trails between the mouth of the Potomac River and the Allegheny Highlands, and is one of 30 congressionally designated scenic and historic trails in the national trails system. The designated Trail corridor embraces portions of five physiographic provinces and four states, the nation's capital, and 20 other units of the national park system. The Potomac Heritage National Scenic Trail designation provides a means to establish an inter-connected trail network between the mouth of the Potomac River and the Allegheny

Highlands and offers, through partnerships with and among agencies and citizen groups, exceptional hiking and other non-motorized recreational and educational experiences rich with geographic, ecological, historical, and social diversity. As a whole, the national scenic trail designation is being used locally and regionally as a catalyst to provide economic and health benefits, expanded non-motorized transportation options, improved educational and interpretive experiences, and connections among communities, historic sites, wildlife areas, and parks.

Below is our response to the environmental scoping questionnaire:

**1. What parameters, if any, would you recommend be used for establishing a natural or cultural resources study area boundary in which to analyze the indirect effects and cumulative impacts to potentially affected resources?**

Natural resource boundaries will vary depending on the resource. However, at this point, the assumed 600 foot buffer should be used in determining direct, indirect, and cumulative impacts to natural resources. The traffic analysis should consider what the impacts would be to traffic volume that would occur to the George Washington Memorial Parkway as a result of your proposal.

In terms of cultural resources, the Area of Potential Effect for cultural resources will be determined through the Section 106 process. The APE should consider direct and in-direct impacts to include, affects directly to the historic properties within the parkway, viewshed impacts of the interchange and any portions that are observable from the Parkway.

**2. Within the study area you have recommended (see question one above), does your agency possess any data regarding past, present, or reasonably foreseeable impacts to natural or cultural resources that you believe should be taken into account when considering potential indirect and cumulative effects?**

The NPS recently completed an EA for the rehabilitation of northern section of the George Washington Memorial Parkway

(<https://parkplanning.nps.gov/projectHome.cfm?parkID=186&projectID=65603>).

In addition, the NPS is about to embark on the rehabilitation of the Arlington Memorial Bridge (<https://parkplanning.nps.gov/documentsList.cfm?projectID=37120>).

Both of these projects will impact traffic along the Parkway and should be considered in your overall traffic analysis and considered as part of your cumulative impact analysis. Once there is a better understanding of the area of disturbance, NPS can determine whether there is any other site specific information that would be relevant to your study.

**3. Are there any existing or planned parks, trails, or recreational sites that may be affected by the proposed project?**

The boundary of the George Washington Memorial Parkway is located within the project's assumed 600 foot buffer ([www.nps.gov/GWMP](http://www.nps.gov/GWMP)). In addition, the Potomac Heritage National Scenic Trail is located directly below the I-495 span along the Virginia side of Potomac River (<https://www.nps.gov/pohe/index.htm>).

**4. Are there any significant historic sites that may be directly or indirectly affected by the proposed project?**

As a designed cultural landscape, the geometry of the Parkway directs attention to carefully planned views and vistas of Washington's monumental core and its environs, which delicately balances buildings and structures with natural beauty of the Potomac Gorge. New or expanded roadway infrastructure has the potential to focus attention away from the landscape and detract from this scenic narrative. Similarly, the potential increase in shade and shadows from new infrastructure over the Parkway could affect the feeling of several spaces that make use of natural light and light direction.

The stone masonry guardwalls along the north section of the Parkway serve to delineate the Parkway, help to frame views, and provide a barrier between the roadway and steep slopes where there are substantial drop-offs into the Potomac River Gorge. The bridges, culverts, and guardwalls of the GWMP were faced or entirely constructed with materials such as rustic rough-cut stone masonry. Such structures were meant to complement the natural environment and are contributing resources to the GWMP historic district listed in the NRHP. The stone walls on the Parkway between Spout Run and I-495/Capital Beltway remain largely as originally constructed and thus retain their historic integrity.

5. **Planning judgment<sup>1</sup> is a structured process that will be used as part of this study to analyze and forecast potential indirect effects and cumulative impacts. Does your agency possess any reports, data sources, or expert input that you recommend be used to inform the use of planning judgement in this study? Additionally, any other tools or resources that your agency might be able to provide to aid in the identification of indirect effects and cumulative impacts would be appreciated and considered.**

NPS is concerned with direct, indirect and cumulative impacts on natural and cultural resources under the purview of the George Washington Memorial Parkway. A thorough analysis should be undertaken for applicable natural and cultural resources in the study area to determine potential impacts of each alternative.

6. **Please provide information regarding any permits, authorizations, approvals, coordination, or review processes that may be required from your agency for this project.**

The NPS will better be able to provide input on this question once there is better understanding of what is being proposed and how it will impact NPS administered resources.

7. **Please provide any other comments or feedback that you feel may be beneficial to the development of this study.**

The George Washington Memorial Parkway is considered a Section 4(f) property as it is a significant historic property and publicly owned parkland. The potentially affected parkland contain significant cultural, historical and natural resource elements that NPS is charged with protecting. Any impacts on parkland will require analysis to determine the feasibility and identify associated mitigation measures.

Within the park, there is known presence of rare plant species, sensitive wildlife species, migratory birds, and federally threatened and endangered species as well as a high probability for Native American archeological sites. These will require special consideration and analysis when determining potential impacts from the project.

In addition, any actions that would require an NPS decision to be made (i.e., issuance of special use permit, transfer of jurisdiction, land exchange, right-of-way permit) require that the compliance with the

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<sup>1</sup> [http://onlinepubs.trb.org/onlinepubs/archive/NotesDocs/25-25\(22\)\\_FR.pdf](http://onlinepubs.trb.org/onlinepubs/archive/NotesDocs/25-25(22)_FR.pdf)



National Environmental Policy Act (NEPA) and National Historic Preservation Act (NHPA) for this project be done in a manner that is easily adoptable by the NPS (43 CFR 46.120). To ensure this, close and frequent collaboration with the NPS is advised so that the NEPA compliance prepared meets both your agency's NEPA requirements and that of NPS. The NPS's Director's Order 12, Conservation Planning, Environmental Impact Analysis and Decision-Making, and accompanying Handbook sets forth the policy and procedures by which the NPS complies with NEPA ([https://www.nps.gov/subjects/nepa/upload/NPS\\_NEPAHandbook\\_Final\\_508.pdf](https://www.nps.gov/subjects/nepa/upload/NPS_NEPAHandbook_Final_508.pdf)).

Once there is a better understanding of the potential NPS action, further information will be shared regarding the appropriate authorization and requirements. If you have any questions or need additional information, please feel free to contact me at (202) 619-7474 or at [tammy\\_stidham@nps.gov](mailto:tammy_stidham@nps.gov). The NPS appreciates the opportunity to provide these comments.

Sincerely,



Tammy M. Stidham  
Chief, Compliance and Planning  
Lands and Planning

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**FW: I-495 Express Lanes Northern Extension Scoping**

1 message

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**Okorn, Barbara** <Okorn.Barbara@epa.gov>  
To: "robert.iosco@vdot.virginia.gov" <robert.iosco@vdot.virginia.gov>

Mon, Jul 23, 2018 at 3:16 PM

---

**From:** Okorn, Barbara  
**Sent:** Monday, July 23, 2018 1:17 PM  
**To:** 'Simkins, John (FHWA)' <John.Simkins@dot.gov>; 'robert.iosco@vdot.gov' <robert.iosco@vdot.gov>  
**Cc:** 'Fuerst, Lee A CIV USARMY CENAO (US)' <Lee.A.Fuerst@usace.army.mil>  
**Subject:** I-495 Express Lanes Northern Extension Scoping

John,

EPA has reviewed your letter dated June 25, 2018 regarding the I-495 Express Lanes Northern Extension in Fairfax County, Virginia. The proposed Environmental Assessment (EA) will evaluate an extension of I-495 Express Lanes, to be located between the northbound and southbound general purpose lanes for approximately three miles north from Dulles Toll Road to the George Washington Memorial Parkway. The EA will evaluate the No- Build Alternative and one Build Alternative. We understand that the study is being done in compliance with the National Environmental Policy Act (NEPA) and CEQ regulations implementing NEPA. Please find below recommendations for the scope of analysis for the proposed study, which includes our responses to the questions attached to the scoping request.

- The EA should include a clear and robust justification of the underlying purpose and need for the proposed action. The purpose and need statement is important to explain why the proposed action is being undertaken and what objectives the project intends to achieve. The purpose of the proposed action is typically the specific objective of the activity. The need should explain the underlying problem for why the project is necessary.
- Alternatives analysis should explain why only one build alternative is being evaluated. include the suite of activities or solutions that were considered and the rationale for not carrying these alternatives forward for detailed study.
- The document should describe potential impacts to the natural and human environment. Existing resources should be identified and EPA encourages that adverse impacts to natural resources, especially wetlands and other aquatic resources, be avoided and minimized.
- We recommend the team provide information on any consideration of ongoing study and potential expansion of managed lanes for a large portion of I-495 and I-270 in Maryland. More info on the project is available <https://495-270-p3.com/>
- A robust narrative describing aquatic resources and functions should be included in the EA. We suggest at a minimum, a narrative should be provided that includes: a discussion of hydrology, including sources and direction of flow; the vegetative communities in the impact area, including size of trees (dbh), percent canopy cover, understory and other components such as woody debris and snags, and presence of invasive species; soil type(s); and an assessment of expected functions based on the HGM type, ecological community, and surrounding land-use. Photos should be included. Some information on resources may be gained from public websites including:
  - EnviroMapper1: <https://www.epa.gov/waterdata/waters-watershed-assessment-tracking-environmental-results-system>
  - Envirofacts2: <https://www3.epa.gov/enviro/>
  - NEPAAssist3: <https://www.epa.gov/nepa/nepassist>
  - 303(d) Listed Impaired Waters: <https://www.epa.gov/exposure-assessment-models/303d-listed-impaired-waters>
  - Watershed Resources Registry: <https://watershedresourcesregistry.org/index.html>. This newly released mapping and screening tool prioritizes areas for preservation and restoration of wetlands, riparian zones, terrestrial areas, and stormwater management across several states in the mid-Atlantic region, including

Pennsylvania. This tool is useful for planners to access environmental data to avoid impacting natural areas and identify optimal mitigation areas.

- Stormwater ponds, best management practices (BMPs) and construction staging areas should not be located in wetlands and streams. Stormwater management alternatives that address the existing and new construction should be considered and are encouraged.
- For this or future projects, please consider the following: to reduce runoff volume and improve water quality, EPA recommends where possible the incorporation of Low Impact Development (LID) design features. Technical guidance in implementing green infrastructure (GI) practices and LID can be found at: <https://19january2017snapshot.epa.gov/sites/production/files/2015-09/documents/eisa-438.pdf> and [www.epa.gov/greeninfrastructure](http://www.epa.gov/greeninfrastructure). We suggest LID options be considered for design of features such as parking, paving, and landscaping. Other information can be found at [www.epa.gov/nps/lid](http://www.epa.gov/nps/lid) ; U.S. EPA's Smart Growth Website: [www.epa.gov/smartgrowth](http://www.epa.gov/smartgrowth) ; and the International Stormwater BMP Database: <http://www.bmpdatabase.org>
- EPA suggests coordinating with other appropriate federal, state and local resource agencies on possible impacts to wetlands, streams and/or rare, threatened and endangered species. As needed, assessment of aquatic resources functions should be provided. We would be pleased to coordinate with VDOT and the U.S. Army Corps of Engineers on this work.
- An evaluation of air quality and community impacts, including noise, light and possible traffic impacts, should be included in the document. General conformity status should be included in the document.
- The EA should include an analysis of any hazardous sites or materials, and the status of any ongoing or past remediation efforts in the project area. This includes any groundwater contamination.
- We recommend the EA include consideration of extreme weather events in particular in association with resiliency design.
- The document should address potential indirect and cumulative effects in the project areas; the cumulative impact analysis should evaluate impacts to environmental resources that have the potential to be impacted by the project (i.e. wetlands, surface water, etc). Analysis may aid in the identification of resources that are likely to be adversely affected by multiple projects, and sensitive resources that could require additional avoidance or mitigation measures. It is suggested that a secondary and cumulative effects analysis begin with defining the geographic and temporal limits of the study; this is generally broader than the study area of the project and be sufficient size to include any downstream effects and cumulative effects in impacted watersheds.
- We suggest the project team consider Federal Highway's handbook for supporting pollinators. It would be helpful if the study discussed any opportunities to plant species attractive to pollinators.

Thank you for coordinating with EPA on this project. We look forward to working with you as more information becomes available. Please let me know if you have any questions on the recommended topics above.

Barb

1 The Watershed Assessment, Tracking & Environmental Results System (WATERS) unites water quality information previously available only from several independent and unconnected databases

2 Includes enforcement and compliance information

3 NEPAassist is a tool that facilitates the environmental review process and project planning in relation to environmental considerations. The web-based application draws environmental data dynamically from EPA Geographic Information System databases and web services and provides immediate screening of environmental assessment indicators for a user-defined area of interest. These features contribute to a streamlined review process that potentially raises important environmental issues at the earlier stages of project development.

Barbara Okorn

Office of Environmental Programs

US EPA, Region III

1650 Arch Street (3EA30)

Philadelphia, PA 19103

215-814-3330





July 24, 2018

Mr. Robert Iosco  
Virginia Mega Projects  
VDOT Northern Virginia District  
4975 Alliance Drive  
Fairfax, VA 22030

Subject: I-495 Express Lanes Northern Extension  
Environmental Assessment - Environmental Scoping Comments  
Fairfax County, Virginia  
VDOT Project Number: 0495-029-419, P101; UPC 113414

Dear Mr. Iosco,

Thank you for the opportunity to comment on the proposed northern extension of the I-495 Express Lanes. Please see attached for WMATA's responses to the scoping questions.

Should you have any further questions or need clarification of our submission, please contact me by email at [skannan@wmata.com](mailto:skannan@wmata.com).

Sincerely,

Shyam Kannan  
Managing Director  
Office of Planning

Attachment:  
Responses to Scoping Questionnaire

**Washington  
Metropolitan Area  
Transit Authority**

600 Fifth Street, NW  
Washington, D.C. 20001  
202/962-1234

*By Metrorail:  
Judiciary Square-Red Line  
Gallery Place-Chinatown  
Red, Green and  
Yellow Lines*

*A District of Columbia  
Maryland and Virginia  
Transit Partnership*

Subject: 1-495 Express Lanes Northern Extension - NEPA Scoping Questionnaire  
Fairfax County, Virginia  
State Project Number: 0495-029-419, P101; UPC: 113414  
Federal Project Number: NHPP-0495 (095)

**1. Will the proposed project affect transit operations?**

Based on the limits provided, the project will directly impact the WMATA Silver Line, which crosses the study corridor on an aerial structure between the Tysons Corner and McLean stations. Design and construction of the Express Lanes must be coordinated closely with WMATA's office of Joint Development and Adjacent Construction (JDAC) to ensure that WMATA structures are protected and rail service is maintained. In addition, there are two Metrobus routes (23A, 23T) that operate on VA-123 across the study area; the 495 project should ensure that any construction-related detours or stop changes are coordinated with Metrobus. In addition, non-WMATA bus services – such as Fairfax Connector and PRTC – play a key role in connecting people to Metrorail at Tysons Corner. For this reason, we ask that VDOT also work closely with those operators to minimize any service disruptions.

**2. Please provide input on potential positive and negative indirect effects that could occur as a result of the proposed project, such as: induced growth, economic development and investment, or improved stormwater management. Any pertinent reports or documents that may support your conclusions would be greatly appreciated.**

Ridership at Tysons Corner and McLean stations is drawn primarily from adjacent land uses, not Park & Ride activity. For this reason, it is unlikely that the Express Lane extension will induce more Metrorail ridership. As with any major roadway expansion near transit, there is a chance that the increased ease of driving will shift trips away from Metro. However, this downside may be limited by the fact that the travel markets that would benefit from the extended lanes are generally distinct from those served by the Silver Line.

While the travel market between Tysons and Montgomery County is significant, no transit provider currently offers a direct link via the American Legion Bridge. Twenty years ago, Metrobus operated a commuter-oriented route along this corridor, but it was discontinued due to low ridership. The lack of demand was primarily due to two factors: (1) dispersed suburban environments that made last-mile connections difficult without a car, and (2) the fact that the buses operated in the same highly-congested conditions as general traffic. In recent decades, suburban centers like Tysons and White Flint have become denser and more pedestrian-friendly, greatly increasing the potential market for transit across the American Legion Bridge. If the proposed project is met by new managed lanes on the Maryland side (including the bridge), the conditions may be right for new transit service in the future. While WMATA cannot make any commitments to future services at this time, the Authority hopes that the proposed project is designed to accommodate buses in the managed lanes.

It should be noted that the pedestrian environment around Tysons Corner continues to be a problem, falling short of the connectivity and comfort needed to make the area a successful transit-oriented community. The major interchanges pose particular challenges, cutting off people's ability to reach Metro stations on foot (or by bike). Recent VDOT/FCDOT projects – such as the Jones Branch Connector and the new trail crossing the interchange of VA-7 and VA-267 – demonstrate VDOT's ability to develop effective mitigations for existing barriers. We hope that the Express Lane extension may provide the opportunity to address barriers that remain, such as the lack of pedestrian access through the VA-123/I-495 Interchange.

- 3. Planning judgment is a structured process that will be used as part of this study to analyze and forecast potential indirect effects and cumulative impacts. Does your agency possess any reports, data sources, or expert input that you recommend be used to inform the use of planning judgment in this study? Additionally, any other tools or resources that your agency might be able to provide to aid in the identification of indirect effects and cumulative impacts would be appreciated and considered.**

The WMATA Office of Planning conducts studies and data analysis related to station access needs, ridership dynamics, regional demographic and real estate trends, and other planning issues that may be relevant to the proposed project. The Managing Director of Planning, Shyam Kannan ([skannan@wmata.com](mailto:skannan@wmata.com)), can facilitate any inquiries.

- 4. Please provide information regarding any permits, authorizations, approvals, coordination, or review processes that may be required from your agency for this project.**

WMATA's Office of Joint Development and Adjacent Construction ([JDAC@wmata.com](mailto:JDAC@wmata.com)) should be the primary point of contact regarding permits, authorizations, approvals, etc. Please contact the office early in the design process to ensure all requirements are understood.

- 5. Please provide any other comments or feedback that you feel may be beneficial to the development of this study.**

No further comments at this time.



# COMMONWEALTH of VIRGINIA

## Department of Agriculture and Consumer Services

PO Box 1163, Richmond, Virginia 23218

[www.vdacs.virginia.gov](http://www.vdacs.virginia.gov)

*Jewel H. Bronaugh, Ph.D*  
*Commissioner*

July 23, 2018

Roberto Iosco  
Virginia MegaProjects  
VDOT Northern Virginia District  
4975 Alliance Drive  
Fairfax, Virginia 22030

Subject: I-495 Express Lanes Northern Extension  
Environmental Assessment – Request for Environmental Scoping Comments  
VDOT Project Number: 0495-029-419, P101, UPC 113414

Dear Mr. Iosco:

This is in response to your letter to this agency dated June 25, 2018, inviting comments concerning potential environmental impacts associated with the extension of the I-495 Express lanes from the Dulles Toll Road to the George Washington Memorial Parkway in Fairfax County. We appreciate the opportunity to provide feedback on this project.

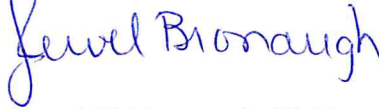
VDACS is responsible for the preservation of farmland and the protection of endangered and threatened plant and insect species. Your letter states that the extended express lanes will be located between the northbound and southbound general purpose lanes. Therefore, VDACS does not anticipate that this project will have an impact on existing farmland. In response to Question 1 on the questionnaire, VDACS suggests that VDOT contact Fairfax County to determine if the county has any established agricultural and forestal districts that may be impacted by this project. Should such districts exist, additional project review is required per § 15.2-4313 of the Code of Virginia. Our agency is not able to provide any information in response to Questions 2, 3, 4, and 5. However, VDACS asks that you be mindful of any actions that could result in altering the water flow within surrounding agricultural lands and, to the greatest extent possible, minimize any adverse drainage or erosion issues that may result. In response to Question 6, VDACS does not require any permits, authorization, approvals, coordination, or review that would be relevant to this project.



Roberto Iosco  
July 23, 2018  
Page 2

Additionally, VDACS works closely with the Department of Conservation and Recreation (DCR) in determining the potential impact of proposed projects on state endangered and threatened plant and insect species. Through a Memorandum of Agreement between our agencies, DCR reviews these projects and submits comments on our behalf. Consequently, any inquiries relating to state protected plant and insect species should be directed to DCR for response. If after researching its database of natural resources, critical habitats, and species locations DCR finds that a project poses a potential adverse impact on an endangered or threatened plant or insect species, the appropriate information will be referred to VDACS for further review and possible mitigation. Please note that requests of this nature should be sent to Rene Hypes at the DCR Division of Natural Heritage Project Review Program. Ms. Hypes can be reached at (804) 371-2708 or [rene.hypes@dcr.virginia.gov](mailto:rene.hypes@dcr.virginia.gov).

Sincerely,



Jewel H. Bronaugh, Ph.D.  
Commissioner

cc: Kevin Schmidt, Director, Office of Policy, Planning, and Research



# COMMONWEALTH of VIRGINIA

Mark K. Flynn  
Director

*Department of Aviation*  
5702 Gulfstream Road  
Richmond, Virginia 23250-2422

V/TDD • (804) 236-3624  
FAX • (804) 236-3635

June 28, 2018

Mr. Robert Iosco  
VDOT Northern Virginia District  
4975 Alliance Drive  
Fairfax, Virginia 22030

RE: I-495 Express Lanes Northern Extension-NEPA Scoping Questionnaire, VDOT Project # 0495-029, P101, UPC 113414

Dear Mr. Iosco:

Thank you for providing the Virginia Department of Aviation the questionnaire regarding the I-495 Express Lanes Northern Extension dated June 25, 2018. In response to the questions posed, staff has the following responses;

1. Please provide input on potential effects to resources under your agency's jurisdiction that could occur as a result of the proposed project. Any pertinent reports or documents that may support your conclusions would be greatly appreciated.

**No impacts are anticipated to any airport in the Commonwealth as a result of the proposed project.**

2. Are there any public or private airports within the vicinity of the study area that may be affected by the proposed project?

**No. There are no public or private airports in the vicinity that would be impacted by the proposed project.**

3. Are there any environmental studies for private or public airports pertinent for the study area?

**No. There are presently no environmental studies the Department is aware of pertaining to airports in the vicinity of the proposed project.**

Mr. Robert Iosco  
June 28, 2018  
Page 2

4. Are there any airport security concerns associated with the proposed projects?

**No. There are no known security concerns associated with this project.**

5. Would roadway construction equipment pose any air navigation hazards?

**The location of the proposed project is not within 20,000 linear feet of any public use airport in the Commonwealth. However, if any crane or other structure, be it permanent or temporary, reaches a height of 200' above ground level, the Federal Aviation Administration (FAA) will require submission of a 7460 form to ensure the proposed structure/development does not constitute a hazard to air navigation.**

6. Please provide information regarding any permits, authorizations, approvals, coordination, or review process that may be required from your agency for this project.

**No additional coordination is necessary for this project as it has been presented.**

7. Please provide any other comments or feedback that you feel may be beneficial to the development of this study.

**No additional comments.**

Thank you for the opportunity to comment on this proposed project. If you have any questions regarding our responses please do not hesitate to contact me at (804) 236-3638.

Sincerely,

S. Scott Denny  
Senior Aviation Planner  
Virginia Department of Aviation

Matthew J. Strickler  
Secretary of Natural Resources

Clyde E. Cristman  
Director



Rochelle Altholz  
Deputy Director of  
Administration and Finance

Russell W. Baxter  
Deputy Director of  
Dam Safety & Floodplain  
Management and Soil & Water  
Conservation

Thomas L. Smith  
Deputy Director of Operations

COMMONWEALTH of VIRGINIA  
DEPARTMENT OF CONSERVATION AND RECREATION

December 20, 2019

Samantha Stratton  
Kimley-Horn and Associates  
11400 Commerce Park Drive, Suite 400  
Reston, VA 20191

Re: UPC 113414, I-495 Next Express Lanes Northern Extension

Dear Ms. Stratton:

The Department of Conservation and Recreation's Division of Natural Heritage (DCR) has searched its Biotics Data System for occurrences of natural heritage resources from the area outlined on the submitted map. Natural heritage resources are defined as the habitat of rare, threatened, or endangered plant and animal species, unique or exemplary natural communities, and significant geologic formations.

According to the information currently in our files, the Potomac Gorge Conservation Site is located within the project site. Conservation sites are tools for representing key areas of the landscape that warrant further review for possible conservation action because of the natural heritage resources and habitat they support. Conservation sites are polygons built around one or more rare plant, animal, or natural community designed to include the element and, where possible, its associated habitat, and buffer or other adjacent land thought necessary for the element's conservation. Conservation sites are given a biodiversity significance ranking based on the rarity, quality, and number of element occurrences they contain; on a scale of 1-5, 1 being most significant. The Potomac Gorge Conservation Site has been given a biodiversity significance ranking of B1, which represents a site of outstanding significance. The natural heritage resources of concern at this site are:

<i>Maianthemum stellatum</i>	Starry Solomon's-plume	G5/S1S2/NL/NL
<i>Phacelia covillei</i>	Coville's phacelia	G3/S1/NL/NL
<i>Gomphus fraternus</i>	Midland Clubtail	G5/S2/NL/NL
<i>Boechera dentata</i>	Short's rock cress	G5/S1/NL/NL
<i>Silene nivea</i>	Snowy Champion	G4?/S1/NL/NL
<i>Gomphus fraternus</i>	Midland Clubtail	G5/S2/NL/NL
<i>Matteuccia struthiopteris var. pennsylvanica</i>	Ostrich Fern	G5T5/S1/NL/NL
Piedmont / Northern Coastal Plain Basic Seepage Swamp		G4G5/S2?/NL/NL
Central Appalachian / Piedmont Basic Mesic Forest (Twinleaf - Blue Cohosh Type)		G4G5/S4/NL/NL
Central Appalachian / Piedmont Low-Elevation Rich Boulderfield Forest		G3G4/S2S3/NL/NL
Coastal Plain / Outer Piedmont Basic Mesic Forest		G4?/ S3/NL/NL
Northern Coastal Plain / Piedmont Mesic Mixed Hardwood Forest		G5/S5/NL/NL

In addition, Tall Thistle (*Cirsium altissimum*, G5/S1/NL/NL), Wild cucumber (*Echinocystis lobata*, G5/SH/NL/NL), Smartweed Dodder (*Cuscuta polygonorum*, G5/S1/NL/NL), Northern rattlesnake-master



(*Eryngium yuccifolium* var. *yuccifolium*, G5T5/S2/NL/NL), One-sided shinleaf (*Orthilia secunda*, G5/SH/NL/NL) and Pizzini's Amphipod (*Stygobromus pizzinii*, G3G4/S1S2/NL/NL) have been historically documented within the project site.

Furthermore, according to a DCR biologist, there is potential for the Northern Virginia Well amphipod (*Stygobromus phreaticus*, G1/S1/SOC/NL) and other *Stygobromus* amphipod species to occur within the portion of the project site along the George Washington Memorial Parkway.

DCR recommends avoidance of impacts to documented occurrences of natural heritage resources by limiting the project footprint to the greatest extent possible, including along the steep bluff on the eastern side of I-495 along the Potomac River. Due to the potential for this site to support additional populations of natural heritage resources, DCR also recommends an inventory for the resources within areas proposed for disturbance including stormwater management ponds and equipment staging areas. With the survey results we can more accurately evaluate potential impacts to natural heritage resources and offer specific protection recommendations for minimizing impacts to the documented resources.

DCR-Division of Natural Heritage biologists are qualified and available to conduct inventories for rare, threatened, and endangered species. Please contact Anne Chazal, Natural Heritage Chief Biologist, at [anne.chazal@dcr.virginia.gov](mailto:anne.chazal@dcr.virginia.gov) or 804-786-9014 to discuss arrangements for fieldwork.

In addition, the proposed project will fragment two C4 Ecological Cores as identified in the Virginia Natural Landscape Assessment (<https://www.dcr.virginia.gov/natural-heritage/vaconvisvnl>), one of a suite of tools in Virginia ConservationVision that identify and prioritize lands for conservation and protection.

Ecological Cores are areas of unfragmented natural cover with at least 100 acres of interior that provide habitat for a wide range of species, from interior-dependent forest species to habitat generalists, as well as species that utilize marsh, dune, and beach habitats. Cores also provide benefits in terms of open space, recreation, water quality (including drinking water protection and erosion prevention), and air quality (including carbon sequestration and oxygen production), along with the many associated economic benefits of these functions. The cores are ranked from C1 to C5 (C5 being the least ecologically relevant) using many prioritization criteria, such as the proportions of sensitive habitats of natural heritage resources they contain.

Fragmentation occurs when a large, contiguous block of natural cover is dissected by development, and other forms of permanent conversion, into one or more smaller patches. Habitat fragmentation results in biogeographic changes that disrupt species interactions and ecosystem processes, reducing biodiversity and habitat quality due to limited recolonization, increased predation and egg parasitism, and increased invasion by weedy species.

Therefore minimizing fragmentation is a key mitigation measure that will preserve the natural patterns and connectivity of habitats that are key components of biodiversity. The deleterious effects of fragmentation can be reduced by minimizing edge in remaining fragments; by retaining natural corridors that allow movement between fragments; and by designing the intervening landscape to minimize its hostility to native wildlife (natural cover versus lawns).

Under a Memorandum of Agreement established between the Virginia Department of Agriculture and Consumer Services (VDACS) and the DCR, DCR represents VDACS in comments regarding potential impacts on state-listed threatened and endangered plant and insect species. The current activity will not affect any documented state-listed plants or insects.

There are no State Natural Area Preserves under DCR's jurisdiction in the project vicinity.

New and updated information is continually added to Biotics. Please re-submit a completed order form and project map for an update on this natural heritage information if the scope of the project changes and/or six months has passed before it is utilized.

A fee of \$120.00 has been assessed for the service of providing this information. Please find attached an invoice for that amount. Please return one copy of the invoice along with your remittance made payable to the Treasurer of Virginia, **DCR - Division of Natural Heritage, 600 East Main Street, 24<sup>th</sup> Floor, Richmond, VA 23219**. Payment is due within thirty days of the invoice date. Please note the change of address for remittance of payment as of July 1, 2013. Late payment may result in the suspension of project review service for future projects.

The Virginia Department of Game and Inland Fisheries (VDGIF) maintains a database of wildlife locations, including threatened and endangered species, trout streams, and anadromous fish waters that may contain information not documented in this letter. Their database may be accessed from <http://vafwis.org/fwis/> or contact Ernie Aschenbach at 804-367-2733 or [Ernie.Aschenbach@dgif.virginia.gov](mailto:Ernie.Aschenbach@dgif.virginia.gov).

Should you have any questions or concerns, please contact me at 804-225-2429. Thank you for the opportunity to comment on this project.

Sincerely,



Tyler Meader  
Natural Heritage Locality Liaison

CC: Troy Andersen, USFWS



Matthew J. Strickler  
Secretary of Natural Resources

Clyde E. Cristman  
Director



Rochelle Altholz  
Deputy Director of  
Administration and Finance

Russell W. Baxter  
Deputy Director of  
Dam Safety & Floodplain  
Management and Soil & Water  
Conservation

Thomas L. Smith  
Deputy Director of Operations

**COMMONWEALTH of VIRGINIA**  
DEPARTMENT OF CONSERVATION AND RECREATION

**MEMORANDUM**

DATE: July 23, 2018  
TO: Robert Iosco, VDOT  
FROM: Roberta Rhur, Environmental Impact Review Coordinator  
SUBJECT: VDOT 18-012, NEPA Scoping I-495 express lanes northern extension

**Division of Planning and Recreation Resources**

The Department of Conservation and Recreation (DCR), Division of Planning and Recreational Resources (PRR), develops the *Virginia Outdoors Plan* and coordinates a broad range of recreational and environmental programs throughout Virginia. These include the Virginia Scenic Rivers program; Trails, Greenways, and Blueways; Virginia State Park Master Planning and State Park Design and Construction.

This project potentially impacts the George Washington National Parkway. For this reason, we recommend coordination with the National Park Service.

**Division of Natural Heritage**

The Department of Conservation and Recreation's Division of Natural Heritage (DCR) has searched its Biotics Data System for occurrences of natural heritage resources from the area outlined on the submitted map. Natural heritage resources are defined as the habitat of rare, threatened, or endangered plant and animal species, unique or exemplary natural communities, and significant geologic formations.

According to the information currently in our files, the Potomac Gorge Conservation Site is located within the project site. Conservation sites are tools for representing key areas of the landscape that warrant further review for possible conservation action because of the natural heritage resources and habitat they support. Conservation sites are polygons built around one or more rare plant, animal, or natural community designed to include the element and, where possible, its associated habitat, and buffer or other adjacent land thought necessary for the element's conservation. Conservation sites are given a biodiversity significance ranking based on the rarity, quality, and number of element occurrences they contain; on a scale of 1-5, 1 being most significant. Potomac Conservation Site has been given a biodiversity significance ranking of B1, which represents a site of outstanding significance. The natural heritage resource of concern at this site is:

*Glyptemys insculpta*

Wood turtle

G3/S2/NL/LT

The Wood turtle ranges from southeastern Canada, south to the Great Lake states and New England. In Virginia, it is known from northern counties within the Potomac River drainage (NatureServe, 2009). The

Wood turtle inhabits areas with clear streams with adjacent forested floodplains and nearby fields, wet meadows, and farmlands (Buhlmann et al., 2008; Mitchell, 1994). Since this species overwinters on the bottoms of creeks and streams, a primary habitat requirement is the presence of water (Mitchell, 1994).

Threats to the wood turtle include habitat fragmentation, urbanization, and automobile or farm machinery mortality (Buhlmann et al., 2008). Please note that the Wood turtle is currently classified as threatened by the Virginia Department of Game and Inland Fisheries (VDGIF).

In addition, the Rusty patched bumble bee (*Bombus affinis*, G1/S1/LE/NL) has been historically documented within the project area. The Rusty patched bumble bee is listed as endangered under the Endangered Species Act by U.S. Fish and Wildlife Service (USFWS) effective March 21, 2017. Since the late 1990s, the Rusty patched bumble bee has declined throughout its historical range including Virginia and is anticipated to be extinct in all ecoregions by 2030. Threats to the Rusty patched bumble bee include disease, pesticides, climate change, habitat loss and small population dynamics.

To minimize adverse impacts to the aquatic ecosystem as a result of the proposed activities, DCR recommends the implementation of and strict adherence to applicable state and local erosion and sediment control/storm water management laws and regulations. Due to the legal status of Wood turtle, DCR also recommends coordination with Virginia's regulatory authority for the management and protection of this species, the VDGIF, to ensure compliance with the Virginia Endangered Species Act (VA ST §§ 29.1-563 – 570). Furthermore, DCR recommends the implementation of the following USFWS voluntary measures for the conservation of the Rusty patched bumble bee: avoid pesticide use, avoid herbicide use, and plant native flowers that bloom throughout the spring and summer to support pollinator habitat.

Under a Memorandum of Agreement established between the Virginia Department of Agriculture and Consumer Services (VDACS) and the DCR, DCR represents VDACS in comments regarding potential impacts on state-listed threatened and endangered plant and insect species. The current activity will not affect any documented state-listed plants or insects.

There are no State Natural Area Preserves under DCR's jurisdiction in the project vicinity.

Many invasive plant species are adapted to take advantage of soil disturbances and poor soil conditions. These adaptations are part of what enable certain species to be invasive. Non-native invasive plants are found through Virginia. Therefore, the potential exists for some VDOT projects to further the establishment of invasive species. To minimize the potential for invasive species infestation, projects should be conducted to minimize the area of disturbance, and disturbed sites should be revegetated with desirable species at the earliest opportunity following disturbance. Equally as important, species used for revegetation should not include the highly invasive species that have traditionally been used for revegetating disturbed sites. We recommend VDOT avoid using crown vetch, tall fescue, and autumn olive if at all possible.

New and updated information is continually added to Biotics. Please re-submit project information and map for an update on this natural heritage information if the scope of the project changes and/or six months has passed before it is utilized.

The Virginia Department of Game and Inland Fisheries (VDGIF) maintains a database of wildlife locations, including threatened and endangered species, trout streams, and anadromous fish waters that may contain information not documented in this letter. Their database may be accessed from <http://vafwis.org/fwis/> or contact Ernie Aschenbach at 804-367-2733 or [Ernie.Aschenbach@dgif.virginia.gov](mailto:Ernie.Aschenbach@dgif.virginia.gov). According to the information currently in our files, Pimmit Run, which has been designated by the Virginia Department of Game and Inland Fisheries (VDGIF) as a "Threatened and Endangered Species Water" for the Wood turtle is within 2 miles of the project area. Therefore, DCR recommends coordination with Virginia's regulatory



authority for the management and protection of this species, the VDGIF, to ensure compliance with the Virginia Endangered Species Act (VA ST §§ 29.1-563 – 570).

Division of Dam Safety and Floodplain Management

According to 44 CFR 60.3, a participating community in the National Flood Insurance Program must receive information on any project in the community's mapped floodplain: bridge, dam removal, or stream restoration to evaluate the project for its effect on the floodplain. If it is determined by an appropriate study by the 'developer' that there is a change in the extent of the floodplain (the edges) or the elevation of the 1% chance flood, then a letter of map revision (LOMR) is submitted to FEMA by the 'developer' so the floodplain map can be up-dated. Local governments have the authority and responsibility to properly manage the mapped floodplain within the community, and that includes submitting to FEMA new technical data on the floodplain within six months of receipt so the maps updated for accuracy.

This project is to extend the express lanes for I-495 from Route 267 north to the George Washington Memorial Parkway with associated improvements to ramps and the median area. Fairfax County participates in the NFIP. The project is considered development within the SFHA and must therefore comply with the County's ordinance, including being permitted by the County. For a project in an AE Zone, documentation must be provided to the County that the project will not result in more than a one-foot increase in the BFE.

The Flood Plain Management Program of DCR does not object to this project as long as it is performed in compliance with Fairfax County's floodplain ordinance.

The remaining DCR divisions have no comments regarding the scope of this project. Thank you for the opportunity to comment.

Cc: Ernie Aschenbach, VDGIF

### Literature Cited

Buhlmann, K. T., Tuberville, and W. Gibbons. 2008. *Turtles of the southeast*. University of Georgia Press. Athens, GA. 252 pp.

Mitchell, J. C. 1994. *Reptiles of Virginia*. Smithsonian Institution Press, Washington. pp. 88-91.

NatureServe. 2009. NatureServe Explorer: An online encyclopedia of life [web application]. Version 7.1. NatureServe, Arlington, Virginia. Available <http://www.natureserve.org/explorer>. (Accessed: April 8, 2010).



# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF ENVIRONMENTAL QUALITY

Street address: 1111 E. Main Street, Suite 1400, Richmond, Virginia 23219

Mailing address: P.O. Box 1105, Richmond, Virginia 23218

[www.deq.virginia.gov](http://www.deq.virginia.gov)

Matthew J. Strickler  
Secretary of Natural Resources

David K. Paylor  
Director

(804) 698-4000  
1-800-592-5482

August 10, 2018

Mr. Robert Iosco  
Virginia Mega Projects  
VDOT Northern Virginia District  
4975 Alliance Drive  
Fairfax, Virginia 22030

Subject: I-495 Express Lanes Northern Extension Environmental Assessment  
Fairfax County, Virginia IT Infrastructure Partnership  
VDOT Project Number: 0495-029-419, P101, UPC 113414

Dear Mr. Iosco:

The Virginia Department of Environmental Quality (DEQ) Air Division, offers the following comments concerning an extension of the I-495 Express Lanes for approximately three miles from the Dulles Toll Road (VA 267) to the George Washington Memorial Parkway (GWMP) in Fairfax County. The project, to be located between the northbound and southbound general purpose lanes, also includes improvements extending approximately 1,800 feet south along GWMP and up to the Maryland state line and the American Legion Bridge to tie into the existing medians.

Fairfax County is currently not meeting the federal National Ambient Air Quality Standard (NAAQS) for ozone and is classified as a marginal ozone nonattainment area (83 FR 25776). In the past, this jurisdiction was also not meeting the NAAQS for fine particulate matter (PM 2.5). The monitored air quality in the vicinity for PM 2.5 has subsequently improved and the area has since been redesignated as an attainment area subject to an air quality maintenance plan (79 FR 60081). In addition, by state regulation, these jurisdictions are also considered volatile organic compound (VOCs) and oxides of nitrogen (NOx) emission control areas (9 VAC 5-20-206). Hence, DEQ recommends that emissions of volatile organic compounds and oxides of nitrogen generated from construction activities are minimized. The State air pollution regulations that may be applicable to the proposed project are listed below.

- Fugitive Dust and Emission Control (9 VAC 5-50-60 et seq.)
- Open Burning Restrictions (9 VAC 5-130-10 et seq.)

- Cut-back Asphalt Usage Restriction (9 VAC 5-40-5490 et seq.)

Please contact me at [Thomas.Ballou@deq.virginia.gov](mailto:Thomas.Ballou@deq.virginia.gov) if there are any questions. Thank you for providing the Virginia Department of Environmental Quality Air Division an opportunity to provide scoping comments for the forthcoming Environmental Assessment. We look forward to working with you in the future.

Sincerely,



Thomas R. Ballou  
Manager, Office of Air Data Analysis and Planning





## MEMORANDUM

**TO:** Robert Iosco, Virginia Mega Projects, VDOT Northern Virginia District

**FROM:** Katy Dacey, Division of Land Protection & Revitalization Review Coordinator

**DATE:** July 18, 2018

**COPIES:** Sanjay Thirunagari, Division of Land Protection & Revitalization Review Manager; file

**SUBJECT:** Environmental Assessment Review: I-495 Express Lanes Northern Extension, Fairfax County, VA

The Division of Land Protection & Revitalization (DLPR) has completed its review of the EA for the I-495 Express Lanes Northern Extension project located three miles north of Dulles Toll Road extending to George Washington Memorial Parkway in Fairfax, Virginia

Project Scope: Extension of northbound and southbound express lanes of I-495 to include improvements to approximately 1,800 feet of existing median(s)

Solid and hazardous waste issues were not addressed in the submittal. The submittal did not indicate that a search of Federal or State environmental databases was conducted. DLPR staff conducted a search (1000 foot radius) of solid and hazardous waste databases (including petroleum releases) to identify waste sites in close proximity to the project area. DLPR search did identify twenty-one waste sites within the project area, which might impact the project. Additionally, no waste sites of possible concern were located within the zip codes of the project area, 22101 and 22102. DLPR staff has reviewed the submittal and offers the following comments:

**Hazardous Waste/RCRA Facilities – none in close proximity to the project area**

**CERCLA Sites – none in close proximity to the project area**

**Formerly Used Defense Sites (FUDS) – none in close proximity to the project area**

**Solid Waste – none in close proximity to the project area**

**Virginia Remediation Program (VRP) – none in close proximity to the project area**

**Petroleum Releases – twenty-one within the project area**

1. *PC#19954228, Westgate, 7655 Old Springhouse Road, McLean, VA 22102. Release Date: 03/21/1995. Status: Closed*
- \*PC#19930288, Westgate, 7655 Old Springhouse Road, McLean, VA 22102. Release Date: 08/11/1992. Status: Closed*
2. *PC#20173015, Esherick Karen Lisa Residence, 7705 Lear Road, McLean, VA 22102. Release Date: 07/25/2016. Status: Closed*
3. *PC#20053170, Primus Virginia Residence, 7714 Lear Road, McLean, VA 22102. Release Date: 12/01/2004. Status: Closed*
4. *PC#20123212, Tanju Bereket R. Residence, 7701 Lear Road, McLean, VA 22102. Release Date: 06/05/2012. Status: Closed*
5. *PC#20113084, Campana Rinaldo A Residence, 1356 Snow Meadow Lane, McLean, VA 22102. Release Date: 10/26/2010. Status: Closed*
6. *PC#20103308, McNeal Douglas B and Shiaoling W Residence, 1352 Snow Meadow Lane, McLean, VA 22102. Release Date: 06/11/2010. Status: Closed*
7. *PC#20103215, Sinha Shrikant N Residence, 1355 Snow Meadow Lane, McLean, VA 22102. Release Date: 01/28/2010. Status: Closed*
8. *PC#20073033, Smoyer Michael C and Jennifer A Residence, 1335 Timberly Lane, McLean, VA 22102. Release Date: 08/17/2006. Status: Closed*
9. *PC#19983545, McConnell Ed Residence, 75056 Box Elder Court, McLean, VA 22102. Release Date: 09/02/1997. Status: Closed*
10. *PC#20073068, Focust John W and Marilyn J Residence, 1311 Timberly Lane, McLean, VA 22102. Release Date: 10/02/2006. Status: Closed*
11. *PC#19890922, Fu Residence, 1024 Delf Road, McLean, VA 22102. Release Date: 02/13/1989. Status: Closed*
12. *PC#20113073, Loria John J Residence, 1025 Delf Road, McLean, VA 22102. Release Date: 10/15/2010. Status: Closed*
13. *PC#20093112, Lacey Jr Trammel C and Kathryn Residence, 963 Saigon Road, McLean, VA 22102. Release Date: 12/18/2008. Status: Closed*
14. *PC#19911629, Cooper Intermediate School, 977 Balls Hill Road, McLean, VA 22030. Release Date: 05/06/1991. Status: Closed*
15. *PC#20043297, Hilliard Thomas P Residence, 908 Countryside Court, McLean, VA 22101. Release Date: 06/11/2004. Status: Closed*
16. *PC#20093079, Schmitt Richard C Residence, 7106 Holyrood Drive, McLean, VA 22101. Release Date: 10/08/2008. Status: Closed*

17. *PC#20053137, Berre Gail Residence, 726 Lawton Street, McLean, VA 22101. Release Date: 11/11/2004. Status: Closed*
18. *PC#20043001, Love Carl Residence, 7015 Green Oak Drive, McLean, VA 22101. Release Date: 07/01/2003. Status: Closed*
19. *PC#20163183, Sibay Mounzer Property, 612 Live Oak Drive, McLean, VA 22101. Release Date: 03/25/2016. Status: Closed*
20. *PC#20103233, Duffy Niall J and Sabine E Residence, 6704 Wemberly Way, McLean, VA 22101. Release Date: 03/04/2010. Status: Closed*
21. *PC#20163072, Thomas E and Melinda S Mooney Living Trust Property, 6706 Lupine Lane, McLean, VA 22101. Release Date: 10/20/2015. Status: Closed*

Please note that the DEQ's Pollution Complaint (PC) cases identified should be further evaluated by the project engineer or manager to establish the exact location, nature and extent of the petroleum release and the potential to impact the proposed project. In addition, the project engineer or manager should contact the DEQ's Northern Virginia Regional Office at (703) 583-3800 (Tanks Program) for further information about the PC cases.

## **PROJECT SPECIFIC COMMENTS**

None

## **GENERAL COMMENTS**

### **Soil, Sediment, Groundwater, and Waste Management**

Any soil, sediment or groundwater that is suspected of contamination or wastes that are generated must be tested and disposed of in accordance with applicable Federal, State, and local laws and regulations. Some of the applicable state laws and regulations are: Virginia Waste Management Act, Code of Virginia Section 10.1-1400 *et seq.*; Virginia Hazardous Waste Management Regulations (VHWMR) (9VAC 20-60); Virginia Solid Waste Management Regulations (VSWMR) (9VAC 20-81); Virginia Regulations for the Transportation of Hazardous Materials (9VAC 20-110). Some of the applicable Federal laws and regulations are: the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Section 6901 *et seq.*, and the applicable regulations contained in Title 40 of the Code of Federal Regulations; and the U.S. Department of Transportation Rules for Transportation of Hazardous Materials, 49 CFR Part 107.

### **Pollution Prevention – Reuse - Recycling**

Please note that DEQ encourages all construction projects and facilities to implement pollution prevention principles, including the reduction, reuse, and recycling of all solid wastes generated. All generation of hazardous wastes should be minimized and handled appropriately.

If you have any questions or need further information, please contact Katy Dacey at (804) 698-4274.



# COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY  
Street address: 629 East Main Street, Richmond, Virginia 23219  
Mailing address: P.O. Box 1105, Richmond, Virginia 23218  
[www.deq.virginia.gov](http://www.deq.virginia.gov)

Matthew J. Strickler  
Secretary of Natural Resources

David K. Paylor  
Director

(804) 698-4000  
1-800-592-5482

June 27, 2018

Robert Iosco  
Virginia MegaProjects  
VDOT Northern Virginia District  
Via email: [robert.iosco@vdot.virginia.gov](mailto:robert.iosco@vdot.virginia.gov)

RE: I-495 Express Lanes Northern Extension  
Project No. 0495-029-419, P101, UPC 113414

Dear Mr. Iosco:

This letter is in response to the scoping request for the above-referenced project.

As you may know, the Department of Environmental Quality, through its Office of Environmental Impact Review (DEQ-OEIR), is responsible for coordinating Virginia's review of federal environmental documents prepared pursuant to the National Environmental Policy Act (NEPA) and responding to appropriate federal officials on behalf of the Commonwealth. Similarly, DEQ-OEIR coordinates Virginia's review of federal consistency documents prepared pursuant to the Coastal Zone Management Act which applies to all federal activities which are reasonably likely to affect any land or water use or natural resources of Virginia's designated coastal resources management area must be consistent with the enforceable policies Virginia Coastal Zone Management (CZM) Program.

## DOCUMENT SUBMISSIONS

In order to ensure an effective coordinated review of the NEPA document and/or federal consistency documentation, notification of the NEPA document and/or federal consistency documentation should be sent directly to OEIR. We request that you submit one electronic to [eir@deq.virginia.gov](mailto:eir@deq.virginia.gov) (10 MB maximum) or make the documents available for download at a website, file transfer protocol (ftp) site or the VITAShare file transfer system (<https://vitashare.vita.virginia.gov>). We request that the review of these two documents be done concurrently, if possible.

The NEPA document and the federal consistency documentation (if applicable) should include U.S. Geological Survey topographic maps as part of their information. We strongly encourage you to issue shape files with the NEPA document. In addition, project details should be adequately described for the benefit of the reviewers.



## **ENVIRONMENTAL REVIEW UNDER THE NATIONAL ENVIRONMENTAL POLICY ACT: PROJECT SCOPING AND AGENCY INVOLVEMENT**

As you may know, NEPA (PL 91-190, 1969) and its implementing regulations (Title 40, *Code of Federal Regulations*, Parts 1500-1508) requires a draft and final Environmental Impact Statement (EIS) for federal activities or undertakings that are federally licensed or federally funded which will or may give rise to significant impacts upon the human environment. An EIS carries more stringent public participation requirements than an Environmental Assessment (EA) and provides more time and detail for comments and public decision-making. The possibility that an EIS may be required for the proposed project should not be overlooked in your planning for this project. Accordingly, we refer to “NEPA document” in the remainder of this letter.

While this Office does not participate in scoping efforts beyond the advice given herein, other agencies are free to provide scoping comments concerning the preparation of the NEPA document. Traditionally, VDOT coordinates directly with localities and other state agencies. Below is a list those entities that VDOT should include:

- Department of Environmental Quality:
- DEQ Regional Office\*
- Air Division\*
- Office of Wetlands and Stream Protection\*
- Office of Local Government Programs\*
- Division of Land Protection and Revitalization
- Office of Stormwater Management\*

Department of Conservation and Recreation

Department of Health\*

Department of Agriculture and Consumer Services

Department of Game and Inland Fisheries\*

Virginia Marine Resources Commission\*

Department of Historic Resources

Department of Mines, Minerals, and Energy

Department of Forestry

Department of Transportation

Note: The agencies noted with a star (\*) administer one or more of the enforceable policies of the Virginia CZM Program.

## **FEDERAL CONSISTENCY UNDER THE COASTAL ZONE MANAGEMENT ACT**

Pursuant to the federal Coastal Zone Management Act of 1972, as amended, and its implementing regulations in Title 15, *Code of Federal Regulations*, Part 930, federal activities, including permits, licenses, and federally funded projects, located in Virginia’s Coastal Management Zone or those that can have reasonably foreseeable effects on Virginia’s coastal uses or coastal resources must be conducted in a manner which is consistent, to the maximum extent practicable, with the Virginia CZM Program.

Additional information on the Virginia’s review for federal consistency documents can be found online at <http://www.deq.virginia.gov/Programs/EnvironmentalImpactReview/FederalConsistencyReviews.aspx>

## DATA BASE ASSISTANCE

Below is a list of databases that may assist you in the preparation of a NEPA document:

- DEQ Online Database: Virginia Environmental Geographic Information Systems

Information on Permitted Solid Waste Management Facilities, Impaired Waters, Petroleum Releases, Registered Petroleum Facilities, Permitted Discharge (Virginia Pollution Discharge Elimination System Permits) Facilities, Resource Conservation and Recovery Act (RCRA) Sites, Water Monitoring Stations, National Wetlands Inventory:

- [www.deq.virginia.gov/ConnectWithDEQ/VEGIS.aspx](http://www.deq.virginia.gov/ConnectWithDEQ/VEGIS.aspx)

- DEQ Virginia Coastal Geospatial and Educational Mapping System (GEMS)

Virginia's coastal resource data and maps; coastal laws and policies; facts on coastal resource values; and direct links to collaborating agencies responsible for current data:

- <http://128.172.160.131/gems2/>

- MARCO Mid-Atlantic Ocean Data Portal

The Mid-Atlantic Ocean Data Portal is a publicly available online toolkit and resource center that consolidates available data and enables users to visualize and analyze ocean resources and human use information such as fishing grounds, recreational areas, shipping lanes, habitat areas, and energy sites, among others.

<http://portal.midatlanticocean.org/visualize/#x=-73.24&y=38.93&z=7&logo=true&controls=true&basemap=Ocean&tab=data&legends=false&layers=true>

- DHR Data Sharing System

Survey records in the DHR inventory:

- [www.dhr.virginia.gov/archives/data\\_sharing\\_sys.htm](http://www.dhr.virginia.gov/archives/data_sharing_sys.htm)

- DCR Natural Heritage Search

Produces lists of resources that occur in specific counties, watersheds or physiographic regions:

- [www.dcr.virginia.gov/natural\\_heritage/dbsearchtool.shtml](http://www.dcr.virginia.gov/natural_heritage/dbsearchtool.shtml)

- DGIF Fish and Wildlife Information Service

Information about Virginia's Wildlife resources:

- <http://vafwis.org/fwis/>

- Environmental Protection Agency (EPA) Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) Database: Superfund Information Systems

Information on hazardous waste sites, potentially hazardous waste sites and remedial activities across the nation, including sites that are on the National Priorities List (NPL) or being considered for the NPL:

- [www.epa.gov/superfund/sites/cursites/index.htm](http://www.epa.gov/superfund/sites/cursites/index.htm)

- EPA RCRAInfo Search

Information on hazardous waste facilities:

- [www.epa.gov/enviro/facts/rcrainfo/search.html](http://www.epa.gov/enviro/facts/rcrainfo/search.html)

- EPA Envirofacts Database

EPA Environmental Information, including EPA-Regulated Facilities and Toxics Release Inventory Reports:

- [www.epa.gov/enviro/index.html](http://www.epa.gov/enviro/index.html)

- EPA NEPAassist Database

Facilitates the environmental review process and project planning:

- <http://nepaassisttool.epa.gov/nepaassist/entry.aspx>

If you have questions about the environmental review process and/or the federal consistency review process, please feel free to contact me (telephone (804) 698-4204 or e-mail [bettina.rayfield@deq.virginia.gov](mailto:bettina.rayfield@deq.virginia.gov)).

I hope this information is helpful to you.

Sincerely,



Bettina Rayfield, Program Manager  
Environmental Impact Review and  
Long-Range Priorities

---

**495 express lanes scoping**

1 message

**McGlone, James** <jim.mcglone@dof.virginia.gov>

Mon, Jul 16, 2018 at 12:26 PM

To: Robert Iosco &lt;robert.iosco@vdot.virginia.gov&gt;

Cc: "Rossetti, Joseph D." &lt;joe.rossetti@dof.virginia.gov&gt;, Gregory Evans &lt;gregory.evans@dof.virginia.gov&gt;, Terry Lasher &lt;terry.lasher@dof.virginia.gov&gt;

Mr. Iosco,

The NEPA Scoping questionnaire for the 495 Express Lanes Extension landed on my desk. The primary forestry concern is with the Fairfax County Park Authority and National Park Service forest resources along the Potomac River at the north end of the project.

-

**James McGlone Ph.D.**

Urban Forest Conservationist

Virginia Department of Forestry

NOVA Area, Central Region

12055 Government Center Pkwy.

Suite 904

Fairfax VA 22035

703-324-1489 (O)

571-512-8525 (C)

[jim.mcglone@dof.virginia.gov](mailto:jim.mcglone@dof.virginia.gov)[www.dof.virginia.gov](http://www.dof.virginia.gov)

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 **495 express lanes extension.docx**  
15K



**Subject: I-495 Express Lanes Northern Extension – NEPA Scoping Questionnaire**

Fairfax County, Virginia

State project Number: 0495-029-419, P101; UPC: 113414

Federal Project Number: NHPP-0495 (095)

1. Are there any agricultural or forestall districts that may be affected by the proposed Project?

None that I am aware of. But this is a county land use designation, I would defer to them.

2. Would the proposed project affect erosion and stormwater runoff? If so, what recommendations do you have for alleviating the anticipated problem?

Any reduction in forest cover or increase in impervious surface will increase runoff and cause in stream erosion. Minimizing loss of mature trees and increase in impervious surface would be the first step. Using stormwater management facilities that increase infiltration and evaporation would also reduce runoff and in stream erosion. Rebuilding receiving streams to accommodate increased runoff using natural channel design techniques would also minimize the effect of increased runoff.

3. Do you have any other concerns regarding tree and forest conservation in connection with this project?

The most sensitive forest resource near the project area is Scott's Run Nature Preserve. Scott's Run flows north to the Potomac River and forms a valley where a northern disjunct forest containing hemlock and other species typically found in more northerly or high elevation areas. There are also forest resources on National Park Service land at the northeastern corner of the project.

4. Are there any foreseeable problems regarding reseeding or landscaping?

Local conservation groups are going to ask once again VDOT to eliminate fescue, lespedeza and other non-native species from its stabilization seed mix. There will be a public outcry over the loss of trees in the project area and a demand for reforestation. These are the same issues that arose during the construction of the southern part of the Express Lanes project. Another issue was the post construction mowing of woody planting sites; being specific about the areas not to be mowed with the ROW manager/contractor will be important.

5. Please Provide information regarding any permits, authorizations, approval, coordination, or review processes that may be required from ;you agency for this project.

Virginia State Code section 10.1 – 1181.2 H requires that you or your contractor notify the Virginia Department of Forestry of any commercial timber harvest. This means that if any timber is removed from this site for further processing off site you must notify DOF.

6. Please provide any other comments or feedback that you fell may be beneficial to the development of this study.

I was involved with the VDOT/citizen engagement during the planning and construction of the original Express Lanes Project. This project is going to be heavily scrutinized for its effects on trees and stormwater. While building new lanes will effect both these resources, the plan will be better received if it includes substantial efforts to mitigate the damage to trees and stormwater.

## Stratton, Samantha

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**From:** ernie.aschenbach@dgif.virginia.gov on behalf of ProjectReview (DGIF), rr <projectreview@dgif.virginia.gov>  
**Sent:** Wednesday, February 12, 2020 12:40 PM  
**To:** Stratton, Samantha; Robert Iosco; rr ProjectReview (DGIF); Troy Andersen; rr vdotprojects  
**Subject:** Re: Attn: Ernie Aschenbach - I-495 NEXT - UPC #113414  
**Categories:** External

ESSLog 30346; Consultant administered VDOT extension of the Interstate 495 (I-495) Express Lanes between Tysons and the Virginia State Line (scoping request)

Due to staffing limitations, we are unable to review and provide preliminary scoping comments on projects that are not currently involved in one of the regulatory review processes for which we are a formal consulting agency (see <https://www.dgif.virginia.gov/environmental-programs/>). If your project subsequently requires a permit or environmental review which involves our Department, we will provide comments through that process to the appropriate agencies. Thank you for soliciting our review of your project, and we invite you to conduct your own review of your project through the Virginia Fish and Wildlife Information Service (VAFWIS) at: <http://vafwis.org/fwis/>.

Thank you for providing the above-referenced preliminary search results. We offer the following recommendations:

**Cross-reference VAFWIS Bald Eagle nest presence/absence with CCB:** We recommend performing an updated search of bald eagle nests known from the area using the Center for Conservation Biology (CCB) website to evaluate whether active bald eagle nests are known from the project area: <http://www.ccbbirds.org/what-we-do/research/species-of-concern/virginia-eagles/nest-locator/>.

**Impacts to bats and bat habitat:** If tree removal or forest management is anticipated, project design and construction should adhere to our standard protocols for bat habitat assessment and protection at:

<http://www.dgif.virginia.gov/wildlife/bats/little-brown-bat-tri-colored-bat-winter-habitat-roosts-application/>

and;

<http://www.dgif.virginia.gov/wildlife/bats/northern-long-eared-bat-application/>.

**Incidental take and best management practices to protect bats:** In addition, the project should incorporate the recommendations in the Department's *Guidance Document on Best Management Practices for Conservation of Little Brown Bats and Tri-Colored Bats*, at: [https://www.dgif.virginia.gov/wp-content/uploads/LBBA\\_TCBA\\_Guidance.pdf](https://www.dgif.virginia.gov/wp-content/uploads/LBBA_TCBA_Guidance.pdf).

If the project proponent elects not to adhere to these recommendations, they may opt to prepare a Conservation Plan to address incidental take of these state-endangered bats. For additional guidance we recommend the proponent refer to our *Best Management Practices* referenced above, and contact DGIF's Bat Biologist, Rick Reynolds, at (540) 248-9360.

**Distribution of our standard awareness guidance for the ST wood turtle to all VDOT staff and contractors:** <https://www.dgif.virginia.gov/wp-content/uploads/Wood-Turtle-Field-Observation-Form.pdf> and strict adherence to our standard guidelines for VDOT projects protective of ST wood turtles.

If instream work becomes necessary, we anticipate a Joint Permit Application (JPA) will be distributed for agency review. We will review the JPA and provide comments as appropriate. Thanks.



**Ernie Aschenbach**

*Environmental Services Biologist*

**P** 804.367.2733

**Email:** [Ernie.Aschenbach@dgif.virginia.gov](mailto:Ernie.Aschenbach@dgif.virginia.gov)

**Virginia Department of Game & Inland Fisheries**

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**A** 7870 Villa Park Drive, P.O. Box 90778, Henrico, VA 23228-0778

[www.dgif.virginia.gov](http://www.dgif.virginia.gov)

On Mon, Feb 10, 2020 at 11:12 AM Stratton, Samantha <[Samantha.Stratton@kimley-horn.com](mailto:Samantha.Stratton@kimley-horn.com)> wrote:

Good morning Ernie,

Following up again with you to confirm that your agency has no further comments on our determinations regarding this project.

Thank you!

**Samantha Stratton** | Environmental Analyst

**Kimley-Horn** | 11400 Commerce Park Drive Suite 400 Reston, VA 20191

Direct: 703 462 2706 | [www.kimley-horn.com](http://www.kimley-horn.com)

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**From:** Stratton, Samantha

**Sent:** Thursday, January 30, 2020 6:37 PM



**To:** ProjectReview (DGIF), rr <[projectreview@dgif.virginia.gov](mailto:projectreview@dgif.virginia.gov)>  
**Subject:** RE: Attn: Ernie Aschenbach - I-495 NEXT - UPC #113414

Ernie,

Wanted to follow up again with you to confirm that your agency has no further comments on our determinations regarding this project.

Thank you,

**Samantha Stratton** | Environmental Analyst  
**Kimley-Horn** | 11400 Commerce Park Drive Suite 400 Reston, VA 20191  
Direct: 703 462 2706 | [www.kimley-horn.com](http://www.kimley-horn.com)

Celebrating 12 years as one of FORTUNE's 100 Best Companies to Work For

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**From:** Stratton, Samantha  
**Sent:** Wednesday, January 8, 2020 11:50 AM  
**To:** ProjectReview (DGIF), rr <[projectreview@dgif.virginia.gov](mailto:projectreview@dgif.virginia.gov)>  
**Subject:** RE: Attn: Ernie Aschenbach - I-495 NEXT - UPC #113414

Ernie,

Please confirm that your agency has no further comment on our determinations regarding this project.

Thank you,

**Samantha Stratton** | Environmental Analyst  
**Kimley-Horn** | 11400 Commerce Park Drive Suite 400 Reston, VA 20191  
Direct: 703 462 2706 | [www.kimley-horn.com](http://www.kimley-horn.com)

Celebrating 12 years as one of FORTUNE's 100 Best Companies to Work For

**From:** Stratton, Samantha

**Sent:** Thursday, November 21, 2019 7:45 PM

**To:** [ProjectReview@dgif.virginia.gov](mailto:ProjectReview@dgif.virginia.gov)

**Cc:** Gresham, Teresa <[Teresa.Gresham@kimley-horn.com](mailto:Teresa.Gresham@kimley-horn.com)>; Krebs, Meridith <[Meridith.Krebs@kimley-horn.com](mailto:Meridith.Krebs@kimley-horn.com)>; Prunty, Rob <[Rob.Prunty@kimley-horn.com](mailto:Rob.Prunty@kimley-horn.com)>; Iosco, Robert <[robert.iosco@vdot.virginia.gov](mailto:robert.iosco@vdot.virginia.gov)>

**Subject:** Attn: Ernie Aschenbach - I-495 NEXT - UPC #113414

Citrix Attachments Expires May 19, 2020

495_AIIVDGIF_111919.pdf	41.1 MB
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[Download Attachments](#)

Samantha Stratton uses Citrix Files to share documents securely.

On behalf of Robert Iosco ([Robert.iosco@vdot.virginia.gov](mailto:Robert.iosco@vdot.virginia.gov), (703) 259-2764) at the Virginia Department of Transportation (VDOT):

Ernie,

The Virginia Department of Transportation (VDOT), in coordination with the Federal Highway Administration (FHWA) as the lead federal agency, is evaluating an extension of the Interstate 495 (I-495) Express Lanes between Tysons and the Virginia State Line. We are requesting your comments on potential effects to threatened and endangered species found within the study area in order to complete our technical reports for NEPA documentation. A project description can be seen below:

*The Build Alternative would extend the existing four I-495 Express Lanes from their current terminus between the I-495/Route 267 interchange and the Old Dominion Drive Overpass north approximately 2.3 miles to the George*

*Washington Memorial Parkway (GWMP). Additional improvements are anticipated to extend approximately 0.3 miles north of the GWMP to provide a tie-in to the existing road network at the American Legion Memorial Bridge (ALMB). The Build Alternative would retain the existing number of general purpose (GP) lanes in each direction between the I-495/Route 267 interchange and the ALMB, consistent with the configuration of the existing I-495 Express Lanes. Direct access ramps would be provided from the I-495 Express Lanes to the Dulles Toll Road and the GWMP. Access would also be provided between the Express Lanes and GP lanes.*

Based on a review of the VDGIF VaFWIS Search Report, there are confirmed observations of the Little-Brown Bat (*Myotis lucifugus*), the Tri-Colored Bat (*Perimyotis subflavus*), and the Wood Turtle (*Glyptemys insculpta*) within the study area. A figure showing the WERMS database results for these species and their proximity to the study area is attached. In addition, winter hibernacula and maternity roost trees were not identified on the NLEB or MYLU & PESU Habitat Mappers, nor were any eagle nests identified on the CCB Bald Eagle Mapper. According to the 2016 Virginia Land Cover Dataset provided by the Virginia Geographic Information Network (VGIN), there are 103 acres of forestland within our Limits of Disturbance (smaller than the study area shown in figures provided) that we are assuming will be impacted. Also attached are the database results and project mapping.

We would appreciate your concurrence on our findings or any other comments DGIF may have.

Thank you,

**Samantha Stratton** | Environmental Analyst  
**Kimley-Horn** | 11400 Commerce Park Drive Suite 400 Reston, VA 20191  
Direct: 703 462 2706 | [www.kimley-horn.com](http://www.kimley-horn.com)

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# COMMONWEALTH of VIRGINIA

Matthew J. Strickler  
Secretary of Natural Resources

Department of Game and Inland Fisheries

Robert W. Duncan  
Executive Director

July 11, 2018

Mr. Robert Iosco  
VDOT Northern Virginia District  
4975 Alliance Drive  
Fairfax, VA 22030

**Re: Request for Determination of Impact upon Wildlife Resources: I-495 Express Lane Northern Expansion – PN 0495-023-419, P101, UPC 113414**

Dear Mr. Iosco:

We appreciate that you submitted your project(s) for review by VDGIF to ensure the protection of sensitive wildlife resources during project development. Due to current staffing limitations within our Fish and Wildlife Information Services (FWIS) and Environmental Services sections, we are unable to review and provide comments on projects that are not currently involved in one of the regulatory review processes for which we are a consultative agency (see <http://www.dgif.virginia.gov/environmental-programs/environmental-services-section.asp>). Please note that no response from VDGIF does not constitute “no comment” nor does it imply support of the project or associated activities. It simply means VDGIF has not been able to respond to your request.

To assist you in determining which, if any, wildlife resources under our jurisdiction, including threatened and endangered wildlife, may be present on or near your project site, we recommend that you access the Virginia Fish and Wildlife Information System (VAFWIS) at <http://vafwis.org/fwis/>.

If you should have further questions or need additional information about VDGIF's Environmental Programs, please visit: <http://www.dgif.virginia.gov/environmental-programs/>.

Please feel free to attach a copy of this correspondence and any reports from VAFWIS with your project paper work to document your correspondence with us regarding this project.

Thank you,

A handwritten signature in black ink, appearing to read "Shirl Dressler", written over a horizontal line.

Shirl Dressler, Program Support Technician  
Environmental Services Admin.



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**I-495 Express Lanes Northern Extension - Office of Drinking Water Project Response**

1 message

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**Warren, Arlene** <arlene.warren@vdh.virginia.gov>  
To: Robert Iosco <robert.iosco@vdot.virginia.gov>

Fri, Jul 27, 2018 at 10:17 AM

**Project Name: I-495 Express Lanes Northern Extension**  
**Project #: 0495-029-419, P101,**  
**UPC #: 113414**  
**Location: Fairfax County**

VDH – Office of Drinking Water has reviewed the above project. Below are our comments as they relate to proximity to **public drinking water sources** (groundwater wells, springs and surface water intakes). Potential impacts to public water distribution systems or sanitary sewage collection systems **must be verified by the local utility.**

There are no public groundwater wells within a 1-mile radius of the project site.

There are no surface water intakes located within a 5-mile radius of the project site.

The project is not within the watershed of any public surface water intakes.

There are no apparent impacts to public drinking water sources due to this project.

*The Virginia Department of Health – Office of Drinking Water appreciates the opportunity to provide comments. If you have any questions, please let me know.*

Best Regards,

Arlene Fields Warren

**GIS Program Support Technician**

**Office of Drinking Water**

**Virginia Department of Health**

109 Governor Street

Richmond, VA 23219

(804) 864-7781

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**NEPA Scoping - Project 0495-029-419, P101, UPC 113414**

1 message

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**Flanders, Kyle** <[kyle.flanders@dhcd.virginia.gov](mailto:kyle.flanders@dhcd.virginia.gov)>  
To: Robert Iosco <[robert.iosco@vdot.virginia.gov](mailto:robert.iosco@vdot.virginia.gov)>

Tue, Jul 24, 2018 at 2:57 PM

Mr. Iosco:

In response to the NEPA scoping questions I would offer the following on behalf of the projects/programs administered by DHCD. There may be projects or programs outside our agency's purview which are impacted in relation to these questions.

- 1) The project will not impact agency projects in this regard.
- 2) The project will not impact agency projects in this regard.
- 3) The project will not impact agency projects in this regard.
- 4) Not included in initial information package.
- 5) N/A
- 6) N/A

Sincerely,

Kyle T. Flanders  
Senior Policy Analyst  
Virginia Department of Housing and Community Development  
Policy Office  
[600 E. Main St. Suite 300](#)  
[Richmond, VA 23219](#)  
phone: (804) 786-6761  
fax: (804) 371-3090  
[kyle.flanders@dhcd.virginia.gov](mailto:kyle.flanders@dhcd.virginia.gov)



## COMMONWEALTH of VIRGINIA

Jennifer L. Mitchell DEPARTMENT OF RAIL AND PUBLIC TRANSPORTATION (804) 786-4440

Director

600 EAST MAIN STREET, SUITE 2102  
RICHMOND, VA 23219-2416

FAX (804) 225-3752  
Virginia Relay Center  
800-828-1120 (TDD)

July 24, 2018

Mr. Robert Iosco  
Virginia MegaProjects  
VDOT Northern Virginia District  
4975 Alliance Drive  
Fairfax, VA 22030

Subject: I-495 Express Lanes Northern Extensions  
Environmental Assessment – Request for Environmental Scoping Comments  
Fairfax County, Virginia  
Project Number: 0495-029-419, P101, UPC 113414

Dear Mr. Iosco:

Thank you for the opportunity to provide input on VDOT's proposed northern extension of the I-495 Express Lanes in advance of the preparation of an Environmental Assessment. The Virginia Department of Rail and Public Transportation (DRPT) recognizes the importance and benefits of this project to the transportation network in Northern Virginia and the greater Washington, DC region. Our completed NEPA Scoping Questionnaire is attached.

DRPT's Northern Virginia Planning Manager, Ciara Williams, will be our contact person for this project if you should have questions or need additional information from DRPT. Ciara can be reached at [ciara.williams@drpt.virginia.gov](mailto:ciara.williams@drpt.virginia.gov) or (703) 259-2200.

We look forward to working with VDOT during the NEPA process and the eventual construction of the Express Lanes extension.

Sincerely,

A handwritten signature in black ink, appearing to read "J DeBruhl".

Jennifer DeBruhl  
Chief of Public Transportation

cc: Todd Horsley, DRPT  
Ciara Williams, DRPT

*The Smartest Distance Between Two Points*  
[www.drpt.virginia.gov](http://www.drpt.virginia.gov)

**Subject: I-495 Express Lanes Northern Extensions – NEPA Scoping Questionnaire**  
Fairfax County, Virginia  
Project Number: 0495-029-419, P101, UPC 113414  
Federal Project Number: NHPP-0495 (095)

1. Will the proposed project affect transit operations?
  - DRPT has reviewed the study area map and has confirmed that there are no existing transit operations within the study area. As several transit providers in Northern Virginia currently utilize the existing HOT and Express Lanes in the region, the proposed northern extension of the I-495 Express Lanes could be beneficial to any future bus transit service that may be implemented in the vicinity of the extension, including any future bus transit connections between Northern Virginia and Montgomery County, Maryland.
2. Please provide input on potential positive and negative indirect effects to resources under your agency’s jurisdiction that could occur as a result of the proposed project. Any pertinent reports or documents that may support your conclusions would be greatly appreciated.
  - DRPT has determined that the proposed project does not appear to impact any currently planned rail or bus transit projects.
3. Planning judgment is a structured process that will be used as part of this study to analyze and forecast potential indirect effects and cumulative impacts. Does your agency possess any reports, data sources, or expert input that you recommend be used to inform the use of planning judgment in this study? Additionally, any other tools or resources that your agency might be able to provide to aid in the identification of indirect effects and cumulative impacts would be appreciated and considered.
  - While DRPT does not have any reports, data sources or other tools/resources to provide to VDOT to analyze and forecast potential indirect effects and cumulative impacts of the proposed project, we do recommend that VDOT consider its own data on the impact to travel times and speeds of the current HOT and Express Lanes in Northern Virginia. Bus transit systems that utilize the current HOT and Express Lanes benefit from the faster speeds and travel times that those facilities allow, and it is reasonable to assume that similar benefits would be realized by any future bus transit services that may be implemented in the vicinity of the proposed project. In addition, DRPT would like to emphasize the need for effective multimodal options within the study area. Without transportation capacity improvements, new transit services and travel demand management services (TDM), it is unlikely that the projected growth in this section of the I-495 corridor can be accommodated.



4. Please provide information regarding any permits, authorizations, approvals, coordination, or review processes that may be required from your agency for this project.

– N/A

5. Please provide any other comments or feedback that you feel may be beneficial to the development of this study.

– As previously noted, there are no existing transit operations along this section of the I-495 corridor; however, the project would likely have positive operational benefits for any new bus transit service that may be implemented along the corridor in the future.

---

**I-495 Express Lanes Northern Extension; VDOT Project Number 0495-029-419, P101, UPC 113414**

1 message

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**Mike Hallock-Solomon** <mhallock-solomon@vofonline.org>  
To: "Robert.Iosco@VDOT.Virginia.gov" <Robert.Iosco@vdot.virginia.gov>  
Cc: Erika Richardson <erichardson@vofonline.org>

Thu, Jul 5, 2018 at 2:30 PM

Mr. Iosco,

The Virginia Outdoors Foundation has reviewed the project referenced above. As of 5 July 2018, there are not any existing nor proposed VOF open-space easements within the immediate vicinity of the project.

Please contact VOF again for further review if the project area changes or if this project does not begin within 24 months. Thank you for considering conservation easements.

In the future, please send requests for VOF review to: [ImpactReview@VOFonline.org](mailto:ImpactReview@VOFonline.org)

Thanks,

Mike

Mike Hallock-Solomon, AICP

**Virginia Outdoors Foundation**

1. Do you anticipate or are you aware of any organized opposition to the proposed project?

We are not aware of any organized opposition to this project at this time.

2. How will the proposed project affect existing and planned land use?

Existing neighborhoods will be impacted because the study area traverses existing, built communities. The James Cooper Middle School property may also be impacted by this project.

Nearby land uses include the following:

Tax Map #	Environmental Features	Comp Plan Base
21-1	RPA, flood plain	1-2 du/ac, private recreation
21-2	RPA, flood plain	1-2 du/ac, public parks
21-3	RPA, flood plain	1-2 du/ac, 2-3 du/ac, public parks, public facilities
29-1	RPA	20+ du/ac, public facilities, office, public parks
29-2	RPA, flood plain	1-2 du/ac, 2-3 du/ac, public parks, office, private open space, industrial (Tysons Urban Center)
29-4	RPA, flood plain, EQC	20+ du/ac, office, mixed uses (Tysons Urban Center)
30-1	RPA, flood plain	1-2 du/ac, industrial, private open space, public parks
30-3	RPA, flood plain	Public facilities, office, industrial, private open space (Tysons Urban Center)
39-2	None	20+ du/ac, mixed uses (Tysons Urban Center)

3. Will the proposed project potentially disrupt a community or planned development?

Yes, please see attached maps.

4. Is the proposed project consistent with County planning documents?

Yes, the proposed project is consistent with the County Transportation Plan, which calls for High Occupancy Toll (HOT) Lanes on the same road segments.

However, some of the proposed project's impacts will occur in areas planned for residential use, mixed use and/or parks. The proposal should meet Comprehensive Plan Environmental Policies to reduce disturbance in environmentally sensitive areas, such as Environmental Quality Corridors and Resource Protection Areas.

The proposed project should also address Heritage Resources goals of the Comprehensive Plan Policies.

5. Where does the proposed project rank among the County's specific transportation improvement needs?

This proposed project is a high priority for the County as it relates to the American Legion Bridge congestion and resulting cut-through traffic, which is having negative impacts on quality of life in nearby neighborhoods. On May 1, 2018, the Fairfax County Board of Supervisors sent a letter to the Maryland Department of Transportation stating how important it is to the county for the congestion problem at the American Legion Bridge to be improved (attached).

6. Is the County considering any future mass transit options for this corridor?

The County Comprehensive Plan designates this corridor for “Enhanced Public Transportation.” No studies have been conducted yet to determine what type of transit may be most appropriate. The Comprehensive Plan for Tysons anticipates that a high-quality transit connection to Maryland will be necessary in the future.

7. In this scoping package we have provided a snapshot of recent economic and social data from the U.S. Census Bureau within the study area. Do you concur this data reflects your current jurisdictional population profile? Additionally, please identify locations in the study area where you feel potential minority or low-income Environmental Justice populations should be considered.

The data does reflect the current Fairfax County population profile.

8. Are there any existing or planned schools, parks, trails, open space, places of worship, or locally significant historic or archaeological sites within or adjacent to the proposed project area?

No impact is anticipated to Historic Overlay Districts so no Architectural Review Board review is needed.

The following locally significant historic sites are within the area of impact:

- George Washington Memorial Parkway (Tax map 21-2) is characterized by local, state and national historic significance and which is in the National Register of Historic Places. The most dramatic changes will be the visual impacts caused by the anticipated physical changes to roadway.
- Beaufort Park (tax map 21-3) is on Inventory of Historic Sites with potential visual impact. It is located within the 600-foot buffer on either side of 495.
- Shiloh Baptist Church (29-1) is on Inventory of Historic Sites and may have a potential visual impact. The proposal may have a potential visual impact, but it is located outside of the 600-foot buffer.

Fairfax County’s Archaeology and Collections Branch has reviewed the maps provided. The area contains numerous sites, and, depending on the level of investigation, will require initial archaeological survey if areas are un-surveyed, Phase II archaeological testing (to determine National Register of Historic Places eligibility) and Phase III data recovery if sites are determined eligible. Any areas within or adjacent to Historic Overlay Districts must also be investigated, per Fairfax County Zoning Ordinance. Each parcel or group of parcels should be assessed on an individual basis.



This proposed project was subjected to an archival archeological review only. If Federal funds or permitting is required, Fairfax County recommends consultation with Virginia Department of Historic Resources (VDHR).

At the completion of any cultural resource studies, Fairfax County requests that the applicant provide two copies (one hard copy, one digital copy) of the archaeology report as well as field notes, photographs, and artifacts to the Park Authority's Resource Management Division within 30 days of completion of the study. Materials can be sent to 2855 Annandale Road Falls Church, VA 20110 for review and concurrence. For artifact catalogues, please include the database in Access™ format, as well as digital photography, architectural assessments, including line drawings. If any archaeological, architectural or other sites are found during cultural resources assessments, the applicant should update files at VDHR, using the VCRIS system.

9. Please provide any additional input on potential positive and negative indirect effects that could occur as a result of the proposed project, such as: induced growth, economic development and investment, or improved stormwater management. Any pertinent reports or documents that may support your conclusions would be greatly appreciated.

The proposed project is located mainly within the Scotts Run watershed; additionally, the proposed limits of disturbance (LOD) extends into the Dead Run watershed, which is listed on the Virginia DEQ's Impaired Waters list. The ecological health of these streams is very poor based on biological integrity, stream physical assessment, habitat assessment, fish species richness, and percent imperviousness. The county has documented numerous drainage, flooding, erosion and storm water infrastructure complaints in both watersheds. Increased impervious surface from the proposed project can increase runoff volume and velocity, exacerbating adverse environmental impacts and threats to safety, property and infrastructure.

For more information, please refer to:

- The Middle Potomac Watershed Management Plan (WMP)  
<https://www.fairfaxcounty.gov/publicworks/sites/publicworks/files/assets/documents/watersheds/middle-potomac-watersheds-full-plan.pdf>; and
- The Urban Stormwater Concepts for Tysons Corner document  
<https://www.fairfaxcounty.gov/tysons/stormwater-management>.

There are 17 active/recently constructed Stormwater improvement projects in the vicinity of the proposed project, particularly in the heavily urbanized Upper Scotts Run sub watershed (multiple stream restorations in Upper Scotts, Flood Mitigation in Lower Scotts, Reforestation, and Flood Mitigation in Dead Run).

**Please see attached Table**

**Additional proposed projects are described in the Middle Potomac WMP. Impacts to existing and proposed Stormwater project sites should be avoided or minimized.**

10. Please provide any information you may have on other recent or planned projects or activities in the area that may have indirect or cumulative impacts to the resources that may be affected by

the proposed project. Additionally, please provide any data regarding permitted impacts that should be considered when analyzing potential indirect and cumulative impacts for the project.

Data from Fairfax County's Stormwater Planning Division's Comprehensive Biological Monitoring program are available on request.

For more information, please refer to:

- The Middle Potomac Watershed Management Plan (WMP)  
<https://www.fairfaxcounty.gov/publicworks/sites/publicworks/files/assets/documents/watersheds/middle-potomac-watersheds-full-plan.pdf>; and
- The Urban Stormwater Concepts for Tysons Corner document  
<https://www.fairfaxcounty.gov/tysons/stormwater-management>.

Several potential impacts of this proposed projects based on identified limits of disturbance are:

- 29,799 linear feet of gravity pipe ranging from 8-inch – 27-inch and 3,942 linear feet of pressure sewer ranging from 1.25-inch – 2-inch.
- There are 6 crossings along this stretch.
- 206 manholes are located within the 600' buffer.

11. Planning judgment<sup>1</sup> is a structured process that will be used as part of this study to analyze and forecast potential indirect effects and cumulative impacts. Does your agency possess any reports, data sources, or expert input that you recommend be used to inform the use of planning judgment in this study? Additionally, any other tools or resources that your agency might be able to provide to aid in the identification of indirect effects and cumulative impacts would be appreciated and considered.

None at this time.

12. Please provide information regarding any permits, authorizations, approvals, coordination, or review processes that may be required from your agency for this project.

Stormwater management and water quality controls above the minimum requirements are strongly recommended. Stormwater should be detained and treated onsite instead of purchasing offsite credits. Low impact development, Best Management Practices and Green Stormwater Infrastructure that improve water quality, reduce water quantity, prevent flooding and protect streams, used by themselves or with other BMPs as part of a storm water treatment train, are encouraged. Fairfax County's Tysons Corner Comprehensive Plan Stormwater Goals should be followed to the maximum extent practicable, particularly in the heavily urbanized Upper Scotts Run watershed.

Close coordination with Fairfax County's Wastewater Management (WWM) will be required once plans for the possible upgrades/changes to I-495 have been developed and are being reviewed. The possible changes may have direct impact on the sanitary sewer system, including but not limited to WWM's operation and maintenance of the system.

Please insure WWM's inclusion on all developments associated with this project.

13. Please provide any other comments or feedback that you feel may be beneficial to the development of this study.

It may be appropriate to upgrade some of the pipes before building new roadways over them.

Contact Virginia Department of Historic Resources and the National Park Service for the George Washington Memorial Parkway impacts.

Contact the Fairfax County History Commission regarding all of the sites as they are in the Inventory of Historic Sites.

PRJ_ID	PRJ_NAME	PRJ_TYPE	PRJ_STATUS	PRJ_PHASE	SPRV_DIST	WSD_NAME
SC9219	Bridle Path Stream Restoration Project	Stream Restoration	Complete	Post Construction	DRANESVILLE	SCOTTS RUN
FX1000-FX003	Old Meadow Road (1761)	Stream Restoration	Complete	Post Construction	PROVIDENCE	SCOTTS RUN
SC76-011	819 Swinks Mill Rd	Flood Protection/Mitigation	Complete	Post Construction	DRANESVILLE	SCOTTS RUN
SC82-0002B	Scotts Run @ Scotts Run Station South via proffered condition (SC82-000C2)	Stream Restoration	Active	Construction	PROVIDENCE	SCOTTS RUN
SC82-0002C	Scotts Run @ Capital One via proffered condition (SC82-000C2)	Stream Restoration	Active	Construction	PROVIDENCE	SCOTTS RUN
SC83-0001	Tyson ÇÖs Galleria Outfall Restoration	Outfall Improvement	Complete	Post Construction	PROVIDENCE	SCOTTS RUN
SC9672C1	819 Swinks Mill Road	Flood Mitigation	Complete	Post Construction	DRANESVILLE	SCOTTS RUN
SC9118	Bridlepath Ln @ Old Gate Ct. (SC9118/0060DP)	Stormwater Pond Retrofit	Complete	Post Construction	DRANESVILLE	SCOTTS RUN
SC82-0003	Scotts Run @ Arbor Row Hanover Parcel (SC82-0003)	Stream Restoration	Complete	Post Construction	PROVIDENCE	SCOTTS RUN
SC213	Bridle Path Lane Stream Restoration	Stream Restoration	Complete	Post Construction	DRANESVILLE	SCOTTS RUN
SC82-0001	Scotts Run Tributary @ Windy Hill Road (SC82-0001)	Stream Restoration	Active	Design	DRANESVILLE	SCOTTS RUN
SC9845SC9845	Scotts Run Tributary @ Arbor Row Hanover Parcel	Stream Restoration	Complete	Post Construction	PROVIDENCE	SCOTTS RUN







SC82-0002	Scotts Run @ Old Meadow Road (SC82-0002)	Stream Restoration	Active	Preliminary Design	PROVIDENCE	SCOTTS RUN
SC72-034	The Colonies @ Scotts Run	Stream Restoration	Complete	Post Construction	PROVIDENCE	SCOTTS RUN
SC9124	McLean Station (0272DP)	Stormwater Pond Retrofit	Complete	Post Construction	DRANESVILLE	SCOTTS RUN
DE86-0001	Dead Run Drive 1012	Flood Mitigation			DRANESVILLE	DEAD RUN
DE89-0001	Reforest for WQ @ FCPA (DE89-0001)	Other	Active	Preliminary Design	DRANESVILLE	DEAD RUN

**I-495 EXPRESS LANES  
NORTHERN EXTENSION  
ENVIRONMENTAL IMPACT  
ASSESSMENT**

**TAX MAP:  
21-1**

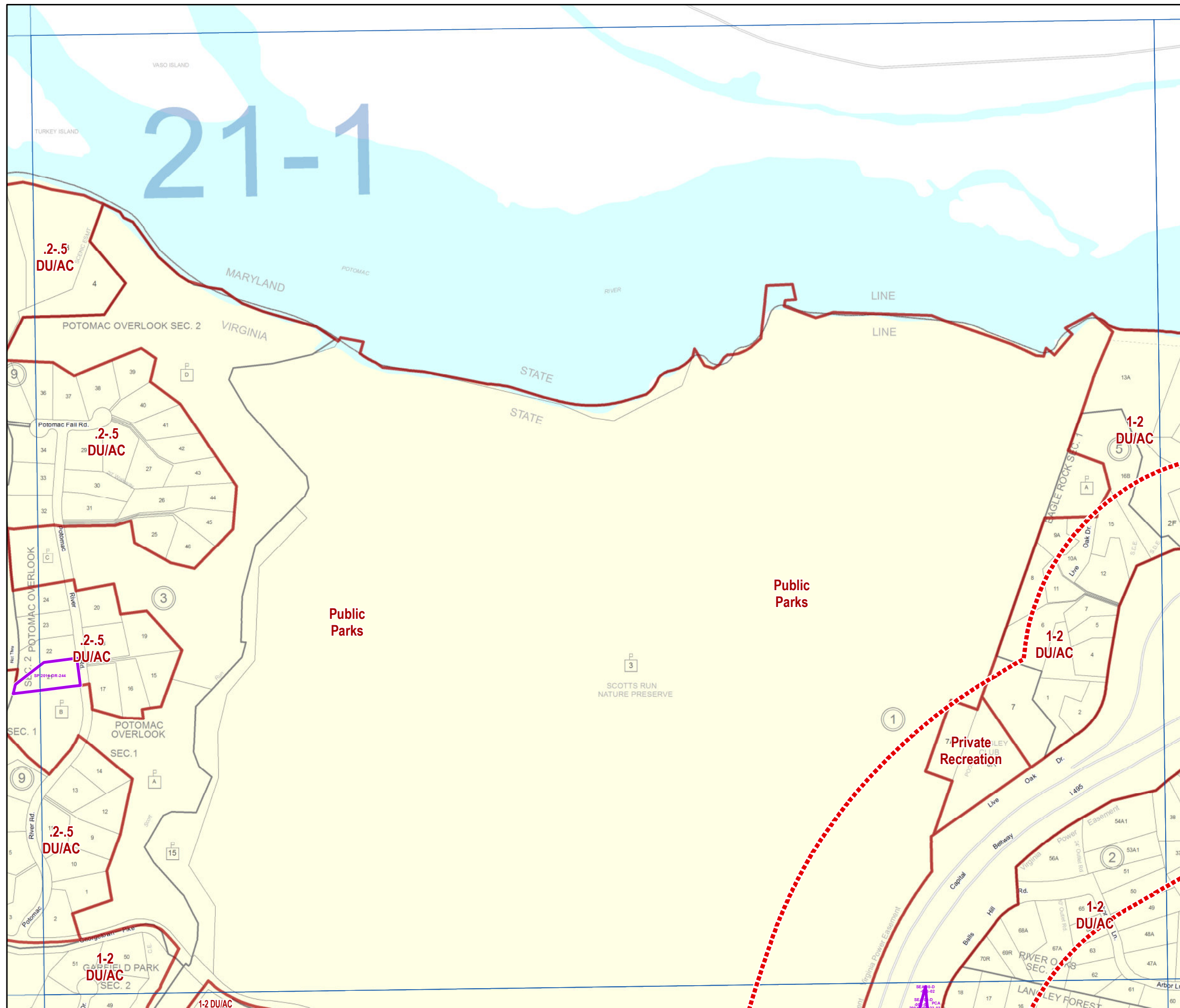
**COMPREHENSIVE  
LAND USE PLAN,  
DEVELOPMENT CENTERS,  
CURRENT ZONING  
APPLICATIONS**

-  600 Foot Buffer
-  Baseline Comp Plan Land Use Recommendation
-  Development Center
-  Current Zoning Application

14-1	14-2		
14-3	14-4	903-3	903-4
20-1	20-2	21-1	21-2
20-3	20-4	21-3	21-4
29-1	29-2	30-1	30-2



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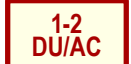


**I-495 EXPRESS LANES  
NORTHERN EXTENSION  
ENVIRONMENTAL IMPACT  
ASSESSMENT**

**TAX MAP:  
21-2**

**COMPREHENSIVE  
LAND USE PLAN,  
DEVELOPMENT CENTERS,  
CURRENT ZONING  
APPLICATIONS**

 600 Foot Buffer

 1-2  
DU/AC Baseline Comp Plan  
Land Use  
Recommendation

 Herndon  
TSA Development  
Center

 RZ  
2017-MV-01 Current Zoning  
Application

14-2				
14-4	903-3	903-4		
20-2	21-1	21-2	22-1	22-2
20-4	21-3	21-4	22-3	22-4
29-2	30-1	30-2	31-1	31-2

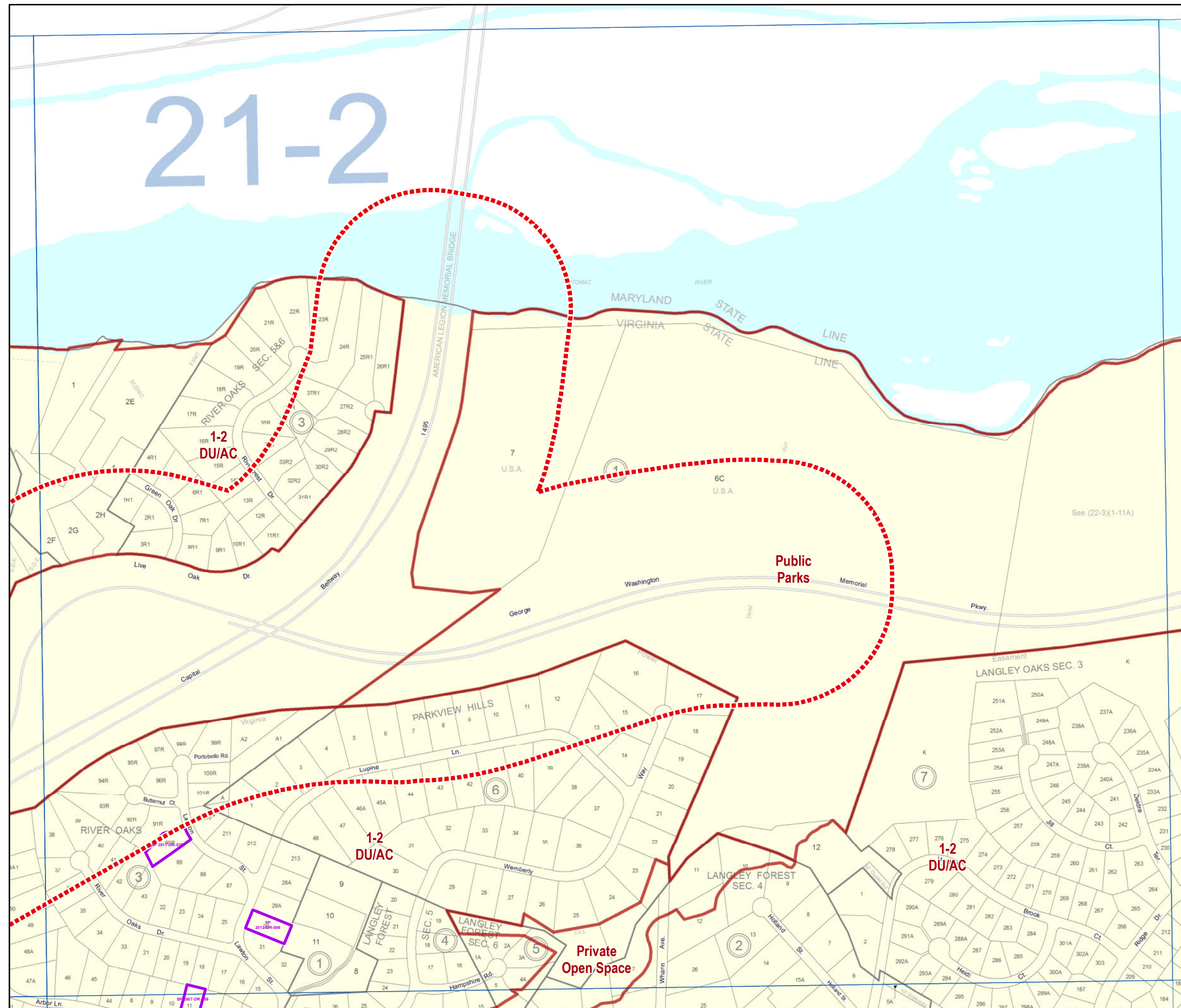


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**I-495 EXPRESS LANES  
NORTHERN EXTENSION  
ENVIRONMENTAL IMPACT  
ASSESSMENT**

**TAX MAP:  
21-3**

**COMPREHENSIVE  
LAND USE PLAN,  
DEVELOPMENT CENTERS,  
CURRENT ZONING  
APPLICATIONS**

-  600 Foot Buffer
-  Baseline Comp Plan Land Use Recommendation
-  Development Center
-  Current Zoning Application

14-3	14-4	903-3	903-4	
20-1	20-2	21-1	21-2	22-1
20-3	20-4	21-3	21-4	22-3
29-1	29-2	30-1	30-2	31-1
29-3	29-4	30-3	30-4	31-3

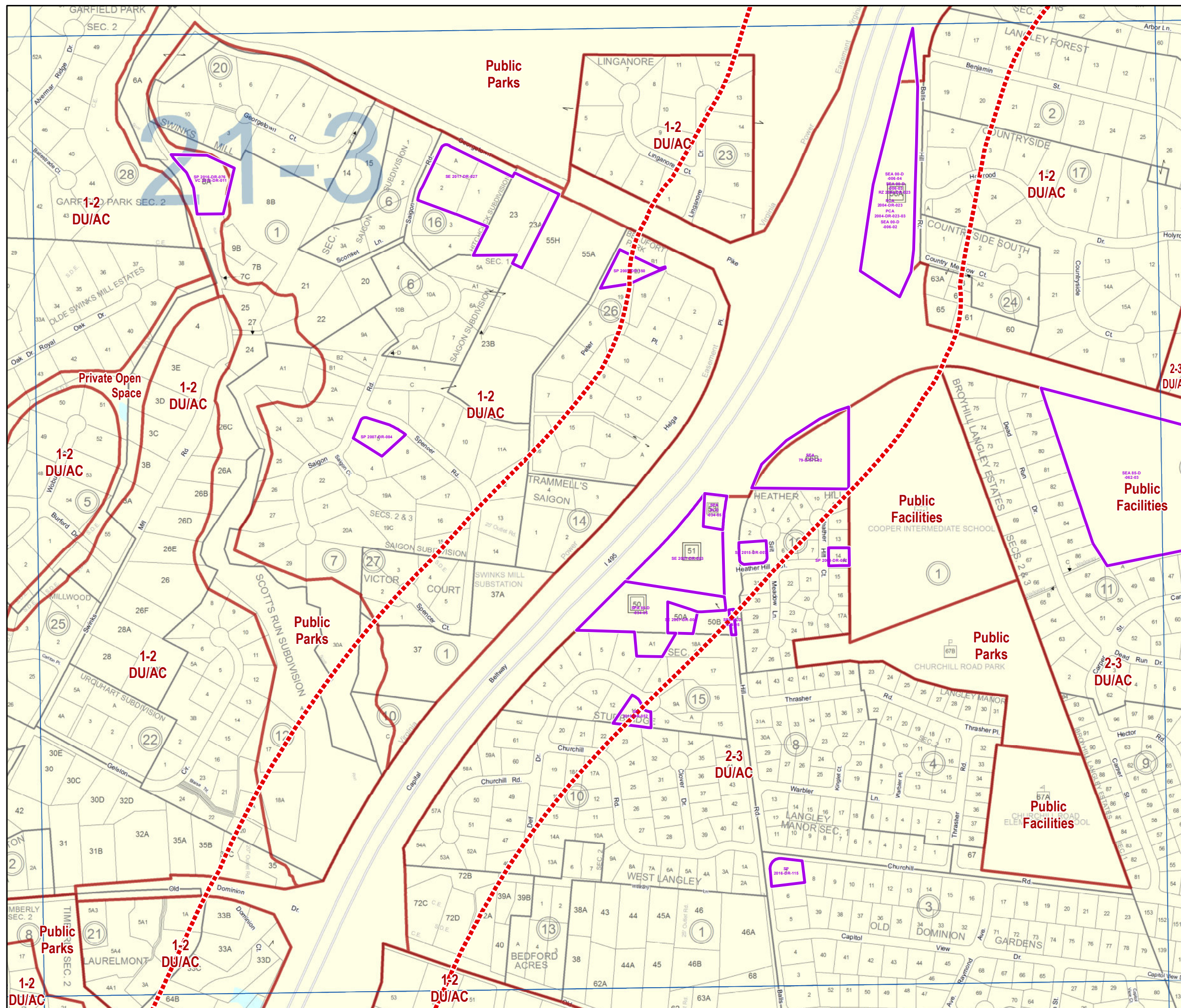


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**I-495 EXPRESS LANES  
NORTHERN EXTENSION  
ENVIRONMENTAL IMPACT  
ASSESSMENT**

**TAX MAP:  
29-1**

**COMPREHENSIVE  
LAND USE PLAN,  
DEVELOPMENT CENTERS,  
CURRENT ZONING  
APPLICATIONS**

 600 Foot Buffer

 Baseline Comp Plan  
Land Use  
Recommendation

 Herndon  
TSA Development  
Center

 RZ  
2017-MV-01 Current Zoning  
Application

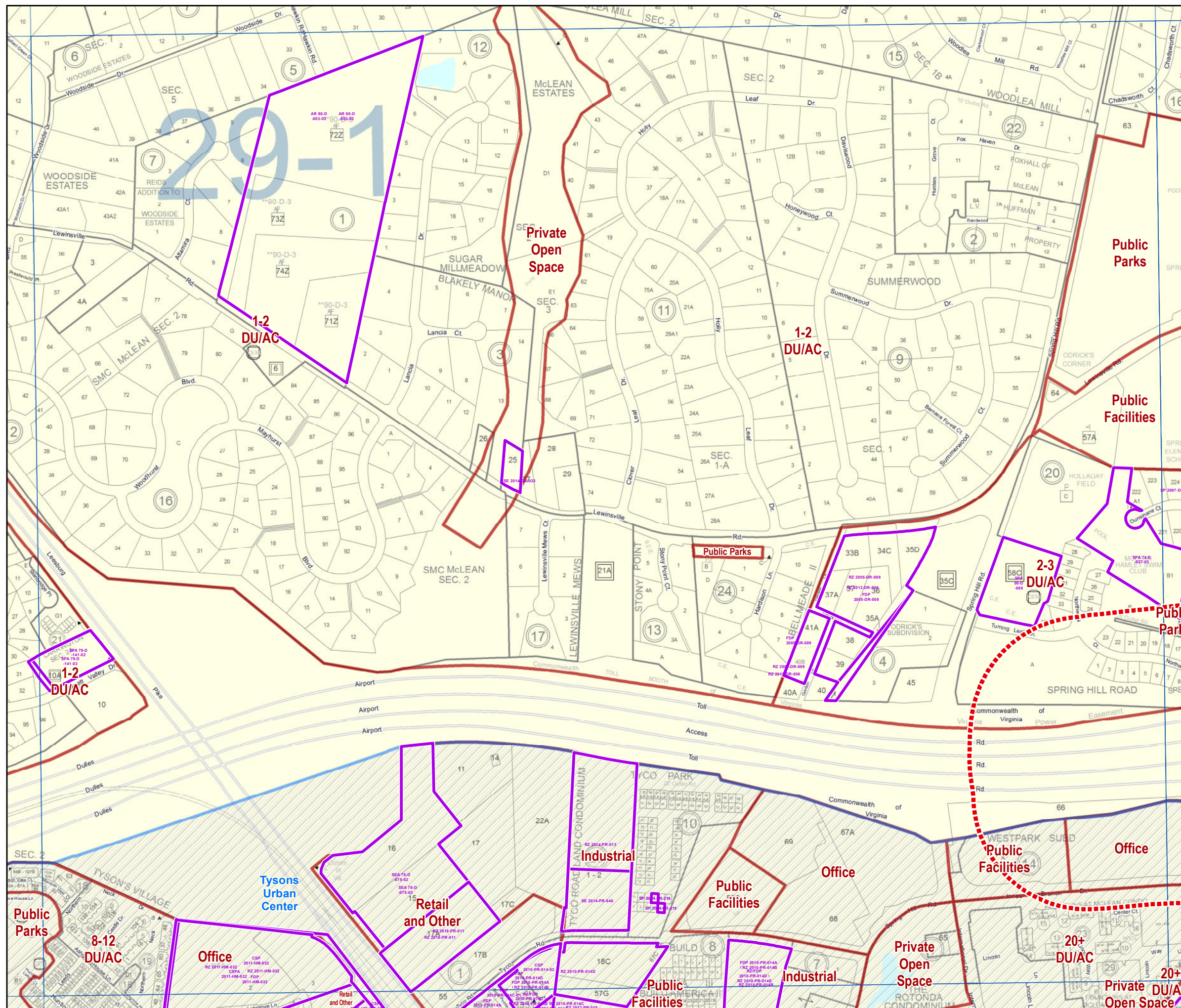
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28-1	28-2	29-1	29-2	30-1
28-3	28-4	29-3	29-4	30-3
38-1	38-2	39-1	39-2	40-1



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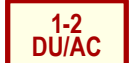


**I-495 EXPRESS LANES  
NORTHERN EXTENSION  
ENVIRONMENTAL IMPACT  
ASSESSMENT**

**TAX MAP:  
29-2**

**COMPREHENSIVE  
LAND USE PLAN,  
DEVELOPMENT CENTERS,  
CURRENT ZONING  
APPLICATIONS**

 600 Foot Buffer

 1-2  
DU/AC Baseline Comp Plan  
Land Use  
Recommendation

 Herndon  
TSA Development  
Center

 RZ  
2017-MV-01 Current Zoning  
Application

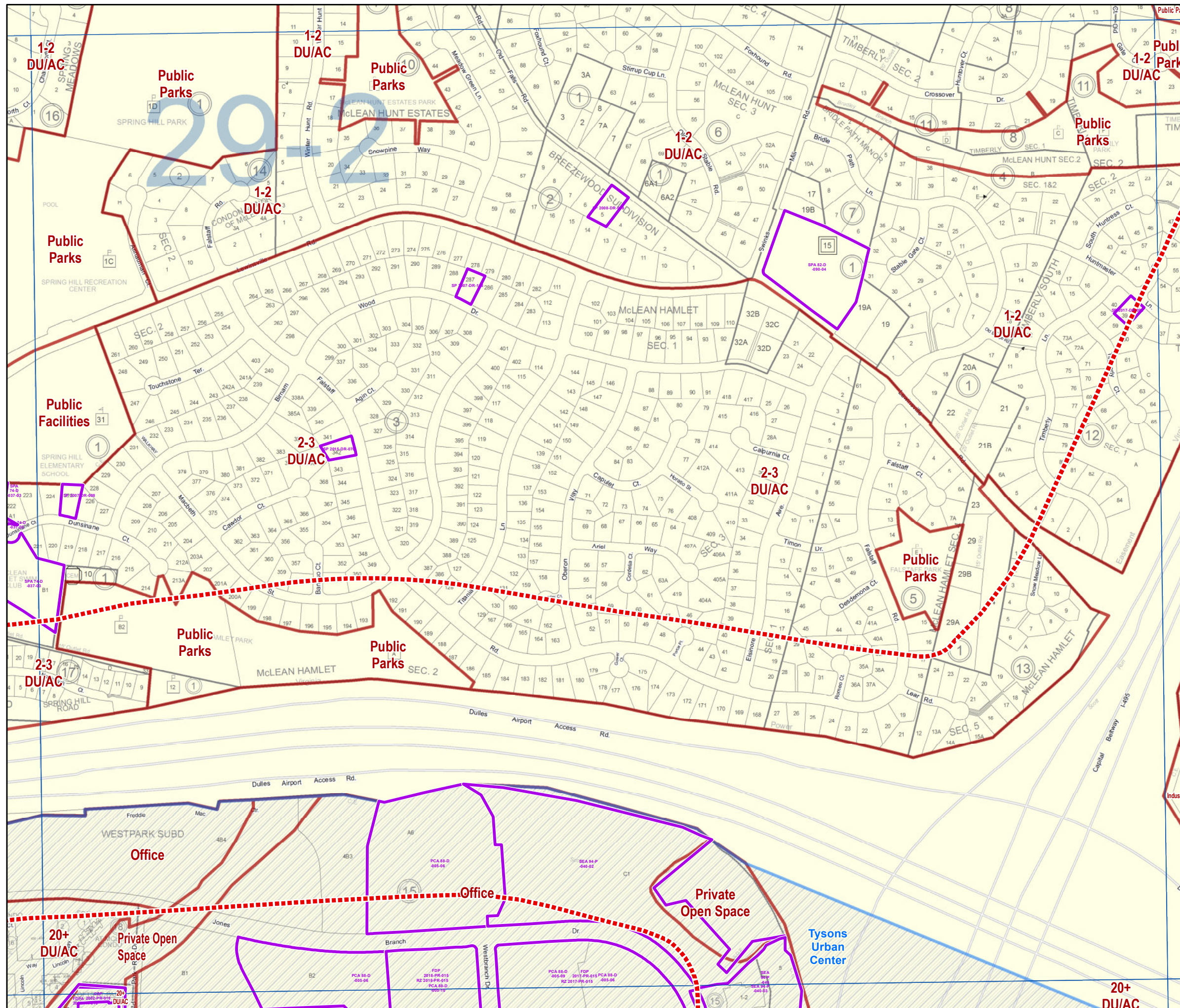
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38-2	39-1	39-2	40-1	40-2



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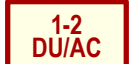


**I-495 EXPRESS LANES  
NORTHERN EXTENSION  
ENVIRONMENTAL IMPACT  
ASSESSMENT**

**TAX MAP:  
29-4**

**COMPREHENSIVE  
LAND USE PLAN,  
DEVELOPMENT CENTERS,  
CURRENT ZONING  
APPLICATIONS**

 600 Foot Buffer

 Baseline Comp Plan  
Land Use  
Recommendation

 Herndon  
TSA Development  
Center

 RZ  
2017-MV-01 Current Zoning  
Application

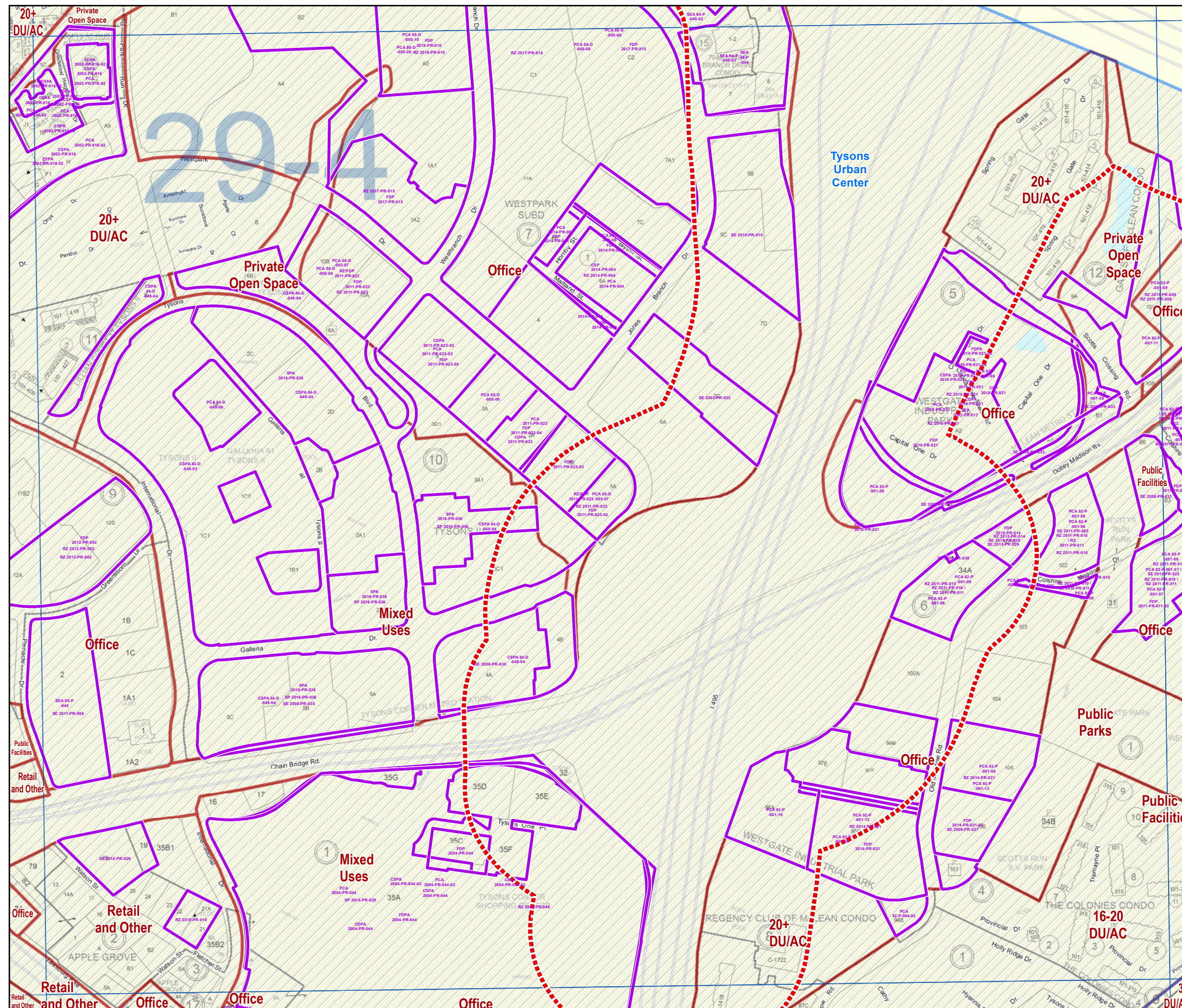
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38-2	39-1	39-2	40-1	40-2
38-4	39-3	39-4	40-3	40-4



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**I-495 EXPRESS LANES  
NORTHERN EXTENSION  
ENVIRONMENTAL IMPACT  
ASSESSMENT**

**TAX MAP:  
30-1**

**COMPREHENSIVE  
LAND USE PLAN,  
DEVELOPMENT CENTERS,  
CURRENT ZONING  
APPLICATIONS**

 600 Foot Buffer

 Baseline Comp Plan  
Land Use  
Recommendation

 Herndon  
TSA Development  
Center

 RZ  
2017-MV-01 Current Zoning  
Application

20-1	20-2	21-1	21-2	22-1
20-3	20-4	21-3	21-4	22-3
29-1	29-2	30-1	30-2	31-1
29-3	29-4	30-3	30-4	31-3
39-1	39-2	40-1	40-2	41-1

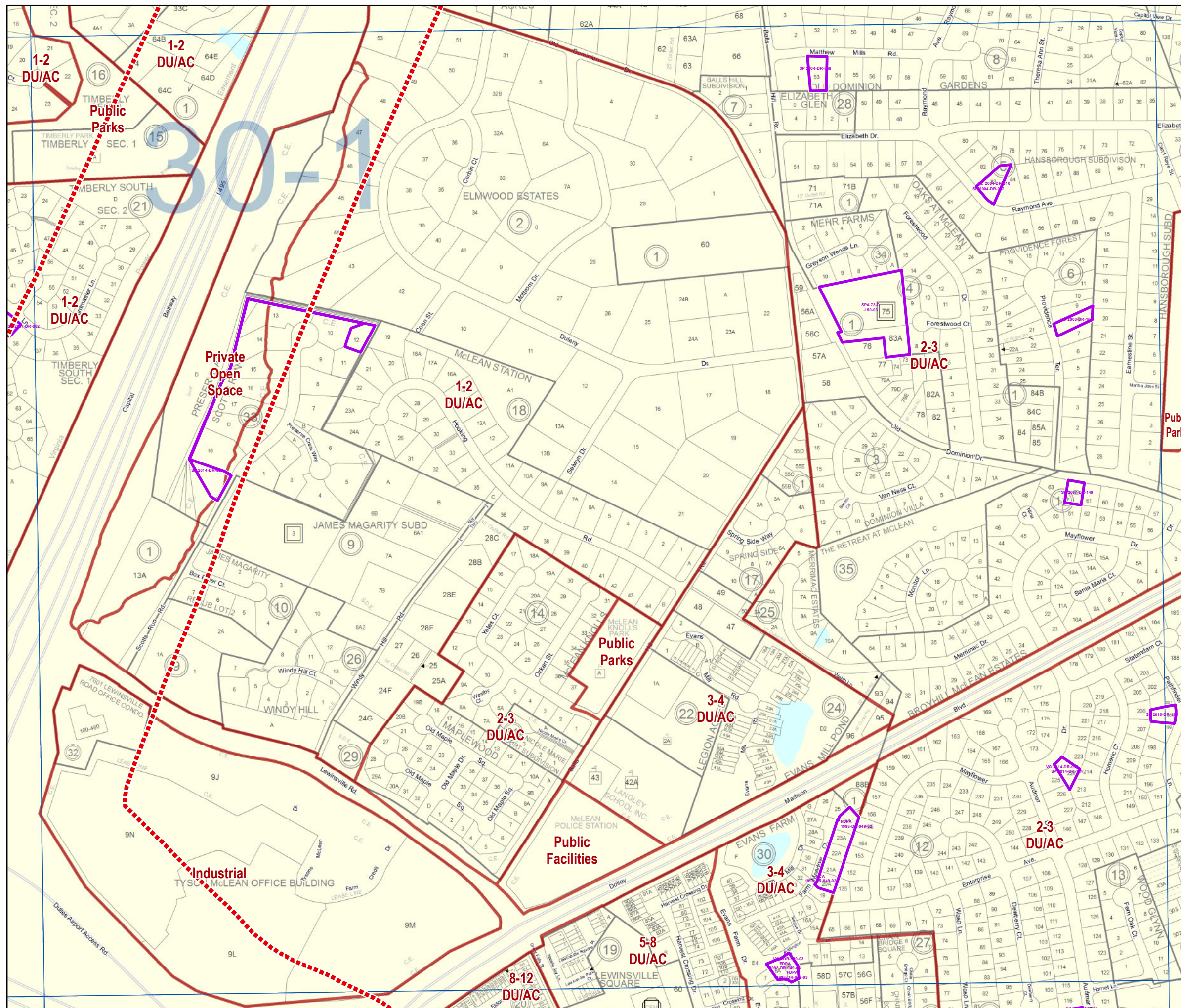


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**I-495 EXPRESS LANES  
NORTHERN EXTENSION  
ENVIRONMENTAL IMPACT  
ASSESSMENT**

**TAX MAP:  
30-3**

**COMPREHENSIVE  
LAND USE PLAN,  
DEVELOPMENT CENTERS,  
CURRENT ZONING  
APPLICATIONS**

 600 Foot Buffer

 Baseline Comp Plan  
Land Use  
Recommendation

 Herndon  
TSA Development  
Center

 RZ  
2017-MV-01 Current Zoning  
Application

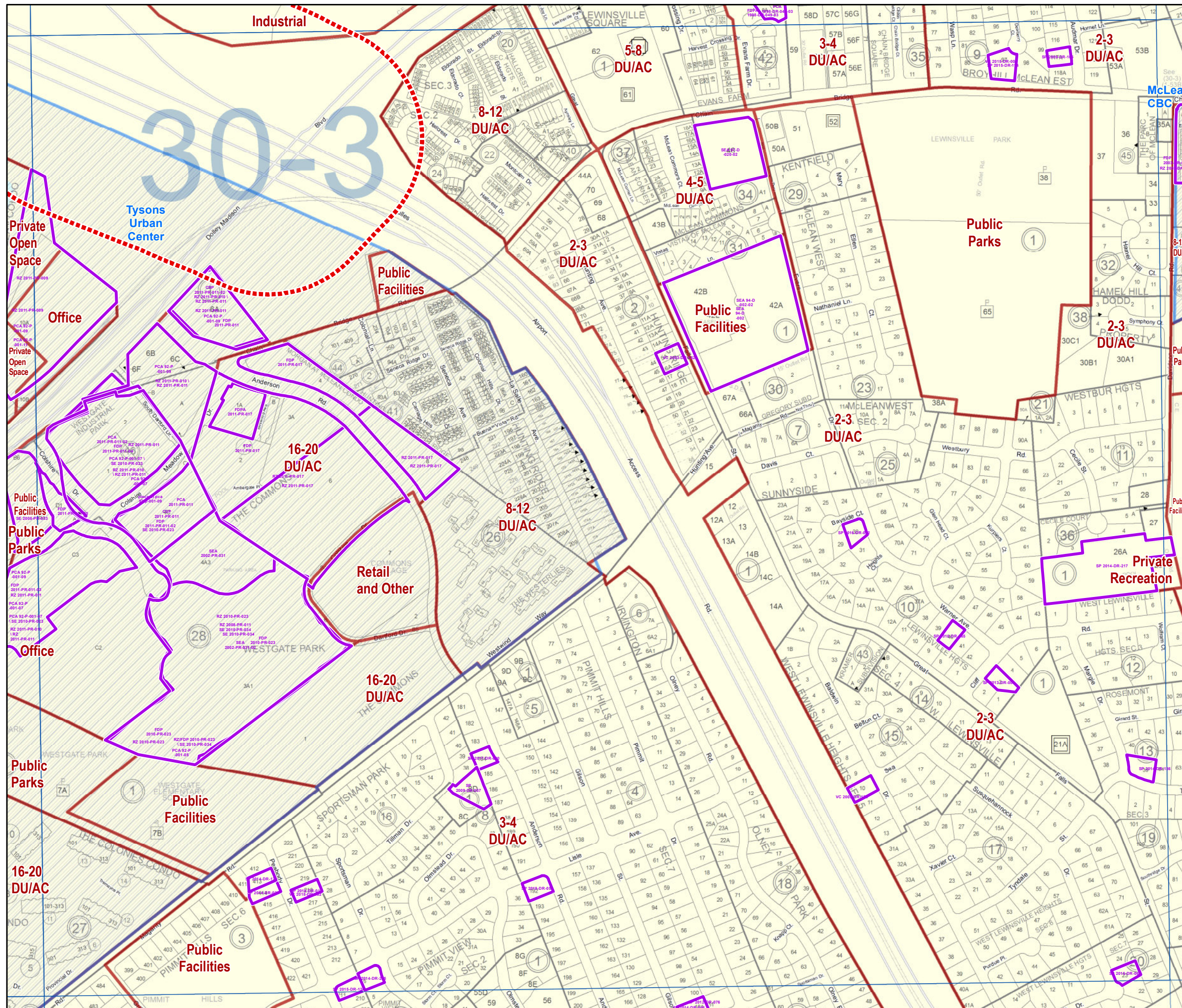
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29-3	29-4	30-3	30-4	31-3
39-1	39-2	40-1	40-2	41-1
39-3	39-4	40-3	40-4	41-3



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**I-495 EXPRESS LANES  
NORTHERN EXTENSION  
ENVIRONMENTAL IMPACT  
ASSESSMENT**

**TAX MAP:  
39-2**

**COMPREHENSIVE  
LAND USE PLAN,  
DEVELOPMENT CENTERS,  
CURRENT ZONING  
APPLICATIONS**

-  600 Foot Buffer
-  1-2 DU/AC  
Baseline Comp Plan  
Land Use  
Recommendation
-  Herndon  
TSA  
Development  
Center
-  RZ  
2017-MV-01  
Current Zoning  
Application

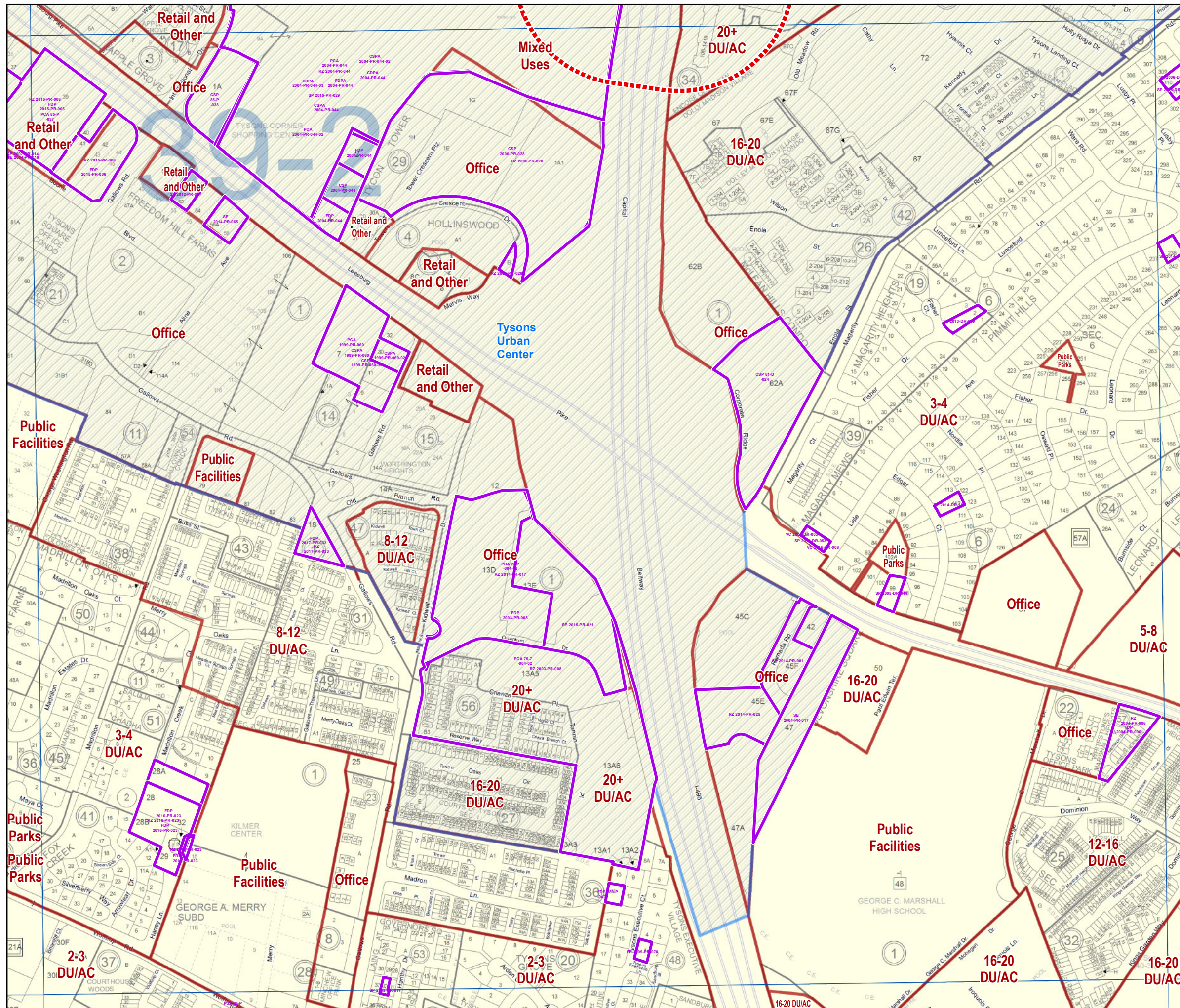
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38-4	39-3	39-4	40-3	40-4
48-2	49-1	49-2	50-1	50-2



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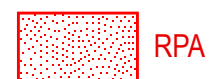




I-495 EXPRESS LANES  
NORTHERN EXTENSION  
ENVIRONMENTAL IMPACT  
ASSESSMENT

TAX MAP:  
**21-1**

FLOODPLAINS, RPA'S



Aerial Imagery copyright  
Pictometry, Inc 2017

14-1	14-2			
14-3	14-4	903-3	903-4	
20-1	20-2	21-1	21-2	22-1
20-3	20-4	21-3	21-4	22-3
29-1	29-2	30-1	30-2	31-1



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USING FAIRFAX COUNTY GIS

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2018\FCDOT\_impact\_study\_response\  
Environmental\_base\_left.mxd

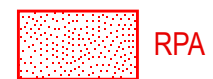




I-495 EXPRESS LANES  
NORTHERN EXTENSION  
ENVIRONMENTAL IMPACT  
ASSESSMENT

TAX MAP:  
**21-2**

FLOODPLAINS, RPA'S



Aerial Imagery copyright  
Pictometry, Inc 2017

14-2				
14-4	903-3	903-4		
20-2	21-1	21-2	22-1	22-2
20-4	21-3	21-4	22-3	22-4
29-2	30-1	30-2	31-1	31-2

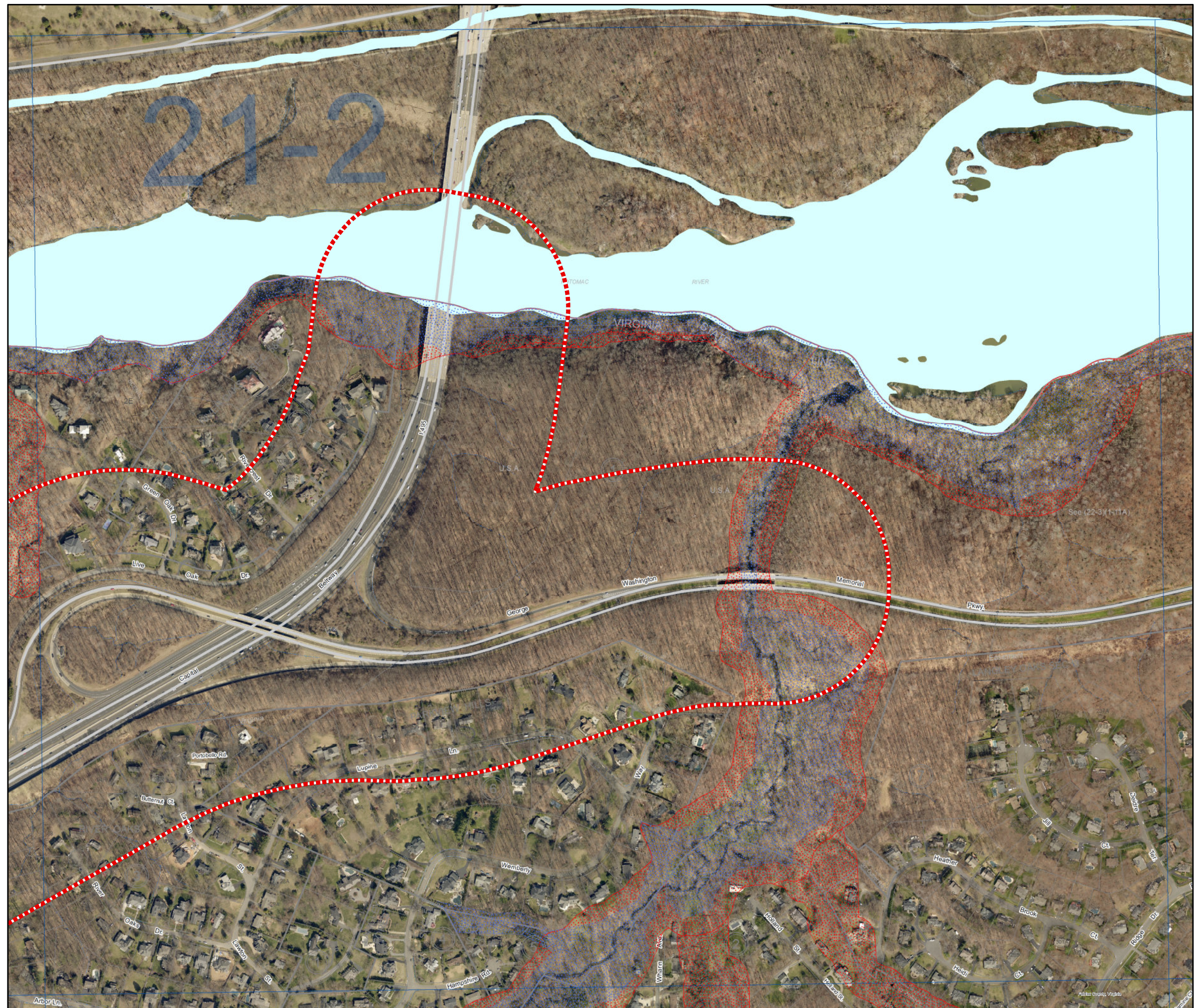


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7/12/2018

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USING FAIRFAX COUNTY GIS

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2018\FCDOT\_impact\_study\_response\  
Environmental\_base\_left.mxd



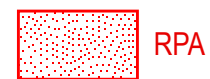


I-495 EXPRESS LANES  
NORTHERN EXTENSION  
ENVIRONMENTAL IMPACT  
ASSESSMENT

TAX MAP:

**21-3**

FLOODPLAINS, RPA'S



Aerial Imagery copyright  
Pictometry, Inc 2017

14-3	14-4	903-3	903-4	
20-1	20-2	21-1	21-2	22-1
20-3	20-4	21-3	21-4	22-3
29-1	29-2	30-1	30-2	31-1
29-3	29-4	30-3	30-4	31-3



500 FEET

Revised to:  
7/12/2018

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PLANNING AND ZONING  
USING FAIRFAX COUNTY GIS

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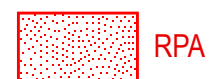




I-495 EXPRESS LANES  
NORTHERN EXTENSION  
ENVIRONMENTAL IMPACT  
ASSESSMENT

TAX MAP:  
**29-1**

FLOODPLAINS, RPA'S



Aerial Imagery copyright  
Pictometry, Inc 2017

19-1	19-2	20-1	20-2	21-1
19-3	19-4	20-3	20-4	21-3
28-1	28-2	29-1	29-2	30-1
28-3	28-4	29-3	29-4	30-3
38-1	38-2	39-1	39-2	40-1



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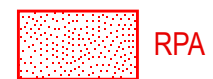




I-495 EXPRESS LANES  
NORTHERN EXTENSION  
ENVIRONMENTAL IMPACT  
ASSESSMENT

TAX MAP:  
**29-2**

FLOODPLAINS, RPA'S



Aerial Imagery copyright  
Pictometry, Inc 2017

19-2	20-1	20-2	21-1	21-2
19-4	20-3	20-4	21-3	21-4
28-2	29-1	29-2	30-1	30-2
28-4	29-3	29-4	30-3	30-4
38-2	39-1	39-2	40-1	40-2



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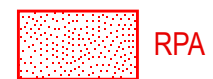




I-495 EXPRESS LANES  
NORTHERN EXTENSION  
ENVIRONMENTAL IMPACT  
ASSESSMENT

TAX MAP:  
**29-4**

FLOODPLAINS, RPA'S



Aerial Imagery copyright  
Pictometry, Inc 2017

19-4	20-3	20-4	21-3	21-4
28-2	29-1	29-2	30-1	30-2
28-4	29-3	29-4	30-3	30-4
38-2	39-1	39-2	40-1	40-2
38-4	39-3	39-4	40-3	40-4



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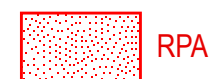




I-495 EXPRESS LANES  
NORTHERN EXTENSION  
ENVIRONMENTAL IMPACT  
ASSESSMENT

TAX MAP:  
**30-1**

FLOODPLAINS, RPA'S



Aerial Imagery copyright  
Pictometry, Inc 2017

20-1	20-2	21-1	21-2	22-1
20-3	20-4	21-3	21-4	22-3
29-1	29-2	30-1	30-2	31-1
29-3	29-4	30-3	30-4	31-3
39-1	39-2	40-1	40-2	41-1



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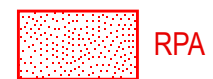




I-495 EXPRESS LANES  
NORTHERN EXTENSION  
ENVIRONMENTAL IMPACT  
ASSESSMENT

TAX MAP:  
**30-3**

FLOODPLAINS, RPA'S



Aerial Imagery copyright  
Pictometry, Inc 2017

20-3	20-4	21-3	21-4	22-3
29-1	29-2	30-1	30-2	31-1
29-3	29-4	30-3	30-4	31-3
39-1	39-2	40-1	40-2	41-1
39-3	39-4	40-3	40-4	41-3



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Revised to:  
7/12/2018

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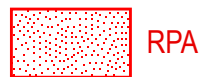




I-495 EXPRESS LANES  
NORTHERN EXTENSION  
ENVIRONMENTAL IMPACT  
ASSESSMENT

TAX MAP:  
**39-2**

FLOODPLAINS, RPA'S



Aerial Imagery copyright  
Pictometry, Inc 2017

28-2	29-1	29-2	30-1	30-2
28-4	29-3	29-4	30-3	30-4
38-2	39-1	39-2	40-1	40-2
38-4	39-3	39-4	40-3	40-4
48-2	49-1	49-2	50-1	50-2



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Revised to:  
7/12/2018

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# County of Fairfax, Virginia

To protect and enrich the quality of life for the people, neighborhoods and diverse communities of Fairfax County

July 25, 2018

Robert Iosco  
Virginia MegaProjects  
Virginia Department of Transportation  
4975 Alliance Drive  
Fairfax, VA 22030-6664

Subject: I-495 Express Lanes Northern Extension Environmental Assessment  
VDOT Project Number: 0495-029-419, P101, UPC 113414

Reference: Your Letter Dated June 25, 2018

Dear Mr. Iosco:

This is in response to your request for Environmental Scoping Comments on the I-495 Express Lanes Northern Extension, State Project Number: 0495-029-419, P101.

There are several environmentally sensitive areas in the project corridor of the I-495 Express Lanes Northern Extension Project requiring consideration during the National Environmental Policy Act of 1969 (NEPA) Environmental Assessment (EA) process. The following summary identifies natural resources and describes regulations administered by Land Development Services (LDS) relating to this work.

### **Resource Protection Areas (RPAs)**

Scotts Run and its several tributaries are within the project corridor from Dulles Toll Road (VA 267) to Old Dominion Drive. The Code of the County of Fairfax, Virginia (County Code) Chapter 118 "Chesapeake Bay Preservation Ordinance" defines RPAs around these perennial streams. Work around these waters may impact the streams and the associated stream buffers.

Public roadways are exempted from provisions of Chapter 118 under Section 118-5-2. That same code requires "optimization of the road alignment and design...to prevent or otherwise minimize encroachment in the Resource Protection Area." Design choices must be made, if available, to minimize encroachment into these RPAs.

LDS does not require an RPA waiver application for an exempted use. However, an exemption narrative should be provided to demonstrate optimization of road alignment. Site-specific RPA delineations are required to be submitted to LDS.



Robert Iosco  
I-495 Express Lanes Northern Extension EA  
Page 2 of 2

**Floodplains**

There are floodplains associated with Scotts Run and Potomac River in the project corridor. Roadways are permitted in floodplains by County Code Chapter 112 “Zoning Ordinance” Section 2-903.6. LDS requires review and approval of a Floodplain Use Determination Request for all work in the floodplain. Any changes to the hydraulics of these floodplains, such as new or modified bridges, require floodplain studies.

**Stormwater Management**

Water quality and quantity regulations of County Code Chapter 124 “Stormwater Management Ordinance” will apply to all work. Compliance will mitigate any detrimental impact to local waterways and prevent environmental degradation from increases in stormwater runoff.

Waivers to the detention requirement of Chapter 124 Section 124-4-4. D may be applied for if no downstream erosion or flooding problems are exacerbated by proposed increases in stormwater flows. However, as with the Fairfax County Department of Transportation projects, this waiver may only be granted if the channel protection and flood protection criteria of the County Code are satisfied.

**Applicability to NEPA EA**

LDS will review that the project has the minimum necessary encroachment into environmentally sensitive RPAs and complies with water quality and quantity regulations of the County Code. Designs meeting these requirements are anticipated to have no significant environmental impacts.

If further assistance is desired, please contact Bin Zhang, Engineer IV, Site Development and Inspections Division (SDID), at 703-324-1720 or [Bin.Zhang@fairfaxcounty.gov](mailto:Bin.Zhang@fairfaxcounty.gov).

Sincerely,



William D. Hicks, P.E.  
Director, Land Development Services  
703-324-1780, TTY 711

cc: Shahab Baig, P.E., Chief, North Branch, Site Development and Inspections Division, LDS  
Bin Zhang, P.E., Engineer IV, SDID, LDS  
Brandy Mueller, LDS Environmental Compliance Specialist, Code Development and Compliance Division, LDS  
IQ File: DPWES IQ #305134 / LDS IQ #305156



Subject: I-495 Express Lanes Northern Extension – NEPA Scoping Questionnaire

Fairfax County, Virginia

State Project Number: 0495-029-419, P101; UPC: 113414

Federal Project Number: NHPP – 0495(095)

- 1) Are there any public groundwater wells or surface water intakes in the proximity of the proposed project?

Washington Aqueduct's Little Falls intake is downstream of the proposed project area. Fairfax Water is a wholesale customer of Washington Aqueduct.

- 2) Is there any potential for contamination of a public water supply system due to the proposed project?

The project is an extension of an existing highway. All the risks for contamination of a public water supply associated with the existing highway will also apply to this project, such as but not limited to spills from vehicles using the highway and application of de-icing chemicals.

- 3) Will the proposed project affect a public water supply?

As this project is an extension of an existing highway, the risks to public water supply, associated with the existing highway will also apply to this project such as but not limited to spills from vehicles using the highway and application of de-icing chemicals.

- 4) Do you anticipate any adverse effects from the proposed project on local sanitary facilities, such as public sewer systems or private septic fields?

Fairfax Water is not responsible for sewer or septic facilities. We suggest contacting the Fairfax County Department of Public Works (sewer) and the Fairfax County Health Department (septics).

- 5) Do you have any concerns regarding public health in connection with this project?

No, Fairfax Water is not aware of any public health concerns related to this project. We suggest contacting the Fairfax County Health Department for more information on this topic.

- 6) Are there any known health issues affecting low-income and minority populations within the study area?

No, Fairfax Water is not aware of any known health issues affecting low-income and minority populations within the study area. We suggest contacting the Fairfax County Health Department for more information on this topic.

- 7) Please provide information regarding any permits, authorizations, approvals, coordination or review processes that may be required from your agency for this project.

Fairfax Water will review project plans for conflicts with its existing facilities and provide any necessary relocation plans to VDOT or its contractor in accordance with the VDOT Utility Manual of Instructions. Contact Robert C. Cotten, P.E., Chief Design Engineer, at (703) 289-6310 or [rcotten@fairfaxwater.org](mailto:rcotten@fairfaxwater.org) to coordinate this effort.

- 8) Please provide any other comments or feedback that you feel may be beneficial to the development of this study.

No Comments.



# FAIRFAX COUNTY PARK AUTHORITY



12055 Government Center Parkway, Suite 927 • Fairfax, VA 22035-5500  
703-324-8700 • Fax: 703-324-3974 • [www.fairfaxcounty.gov/parks](http://www.fairfaxcounty.gov/parks)

August 8, 2018

Robert Iosco  
Virginia MegaProject  
VDOT Northern Virginia District  
4975 Alliance Drive  
Fairfax, VA 22030

Subject: I-495 Express Lanes Northern Extension  
Environmental Assessment  
VDOT Project Number: 0495-029-409, P101, UPC 113414

Dear Mr. Iosco:

Fairfax County Park Authority staff has completed a very high-level review of the above referenced project. Your letter of June 25, 2018, as well as the 495 Express Lanes Northern Extension project webpage, provided little in terms of detail as to the ultimate alignment of I-495 or the extent of the envisioned impacts. Within the broadly defined limits of the project as shown in Figure 1 with your letter, the Park Authority owns and manages three parks – Scotts Run Nature Preserve, Timberly Park, and McLean Hamlet Park. Just at the limits of the defined project area is a fourth Park Authority owned property, Falstaff Park. The following responses to your questions, unless otherwise noted, address potential impacts to these properties.

1. Are there any existing or planned parks or recreation sites that may be affected by the proposed project?

*Overall, the parks of noted concern are largely undeveloped, natural spaces. Scotts Run Nature Preserve has an extensive trail network, some of which lies within the project area. Should the existing trail connection be disrupted, it would be expected that the I-495 project reestablish the connection in a manner acceptable to the Park Authority.*

*McLean Hamlet Park is currently undeveloped but planned for a series of trails with exercise stations, picnic pavilion, and bicycle parking. Potential impacts from the I-495 project would not affect existing facilities but may require replanning of the park and the loss of usable acreage.*

*Timberly Park is undeveloped, largely comprised of floodplain and Chesapeake Bay Resource Protection Area within the project area.*

*It is noted that Falstaff Park, beyond the estimated footprint of the I-495 project, is developed with a playground. Some concern is noted regarding potential noise impacts to this facility*





*should reconfiguration of the I-495/267 interchange significantly shift the lane configuration to the northwest.*

2. Are there any locally significant historic sites that may be directly or indirectly affected by the proposed project?

*The land area within the broadly defined project limits was subjected to archival cultural resources review. The project area contains numerous sites, both within park boundaries and beyond. The Park Authority would require an initial archaeological survey for any acquisition or disturbance of parkland, followed by Phase II archaeological testing and Phase III data recovery, as indicated. For properties that are not owned by the Park Authority, the Park Authority would recommend a similar level of analysis for properties that demonstrate a moderate to high probability of yielding important resources or information. Each parcel or group of parcels should be assessed on an individual basis.*

*If federal funding or permitting is required for this project, there are specific archaeological requirements under Section 106 of the National Historic Preservation Act. If Section 106 applies then any archaeological work under this recommendation should also be coordinated in advance with the Virginia State Historic Preservation Officer (SHPO). If Federal funding or permitting is required, the applicator should initiate consultation with the Virginia Department of Historic Resources (VDHR).*

3. Are there any sites within or adjacent to the project area that were acquired and developed with Federal Land and Water Conservation Act funds (Section 6(f))?

*A portion of Scotts Run Nature Preserve, noted in Fairfax County land records as Tax Map 21-1 ((1)) parcel 3, was acquired with Federal Land and Water Conservation Act funds; therefore, Section 6(f) would apply.*

4. Please provide information regarding any permits, authorizations, approvals, coordination, or review processes that may be required from your agency for this project.

*Although not specifically identified by the broad scope of the study area, it could be anticipated that VDOT will require, at the least, construction operations on parkland. In order to do any clearing and grading or drainage improvement on adjacent parkland, the applicant must first acquire a Letter of Permission and/or Easement from the Park Authority. Conditions and/or fees may be required for Park Authority permits or easements. If any land disturbing activities are proposed on park property, the applicant must submit a request for a permit and/or easement request. Applications and information are available at <http://www.fairfaxcounty.gov/parks/plandev/easements.htm>.*

*McLean Hamlet Park is included in the list of properties associated with the Board of Supervisors' Land Bank. Acquisition of right-of-way or easements would need to be jointly coordinated with the BOS, through the Park Authority.*

*In general, acquisition of parkland for right-of-way dedication or easements will require more specific coordination with the Easement Coordinator, Fairfax County Park Authority, Planning*

and Development Division, 12055 Government Center Parkway, Suite 421, Fairfax, Virginia 22035; main telephone number (703) 324-8741.

*Additionally, the areas of Scotts Run Nature Preserve, Timberly Park, and Mclean Central Park identified by VDOT for its project may be considered significant under Section 4(f), and VDOT's project may adversely impact significant natural resources at these parks. To receive written concurrence from the Fairfax County Park Authority for a de minimis determination, the Park Authority requires any adverse impacts to its natural resources by VDOT to follow its Policy 201 titled Natural Resources (<http://www.fairfaxcounty.gov/parks/parkpolicy/park-policy-manual.pdf>) and the agency-wide Natural Resource Management Plan, recommended action number eight (<http://www.fairfaxcounty.gov/parks/resource-management/downloads/nrmp012914.pdf>). VDOT will need to agree to rehabilitate any temporary impacts to natural resources to Park Authority standards and mitigate/compensate for permanent impacts to natural resources on Park Authority managed lands. This requirement applies to any natural resource impact (terrestrial or aquatic) that is not regulated under the jurisdiction of any federal or state agency. Total impacts and mitigation/compensation costs will be determined upon completion of the site design.*

5. Please provide any other comments or feedback that you feel may be beneficial to the development of this study.

*The Potomac Heritage Trail is an expanding, interconnected system of trails that celebrates the area's cultural and natural history from the Potomac River in the Northern Neck of Virginia to the Allegheny Mountains in Pennsylvania, connected through Washington, D.C. and Maryland as well. Currently, I-495 presents a significant barrier to pedestrian and bicycle connectivity within the Virginia portion of the trail. In planning for improvements to I-495 to enhance vehicular movements, opportunities to provide connections for non-motorized traffic across the extensive road network should be considered.*

The Park Authority appreciates the opportunity to comment on this project and looks forward to further coordination as the I-495 Express Lanes North Extension project advances.

Sincerely,



David R. Bowden  
Director, Planning and Development Division

Copy: John W. Foust, Supervisor, Dranesville District  
Timothy B. Hackman, FCPA Board Representative, Dranesville District  
Kirk Kincannon, Executive Director, FCPA  
Sara Baldwin, Deputy Director/COO, FCPA  
Aimee Vosper, Deputy Director/CBD, FCPA  
Barbara Nugent, Director, Resource Management Division, FCPA  
John Stokely, Manager, Natural Resource Protection Branch, FCPA

Liz Crowell, Manager, Cultural Resource Protection Branch, FCPA  
Andi Dorlester, Manager, Park Planning Branch, FCPA



**Board of Directors**  
John W. Peterson, Chairman  
George W. Lamb, Vice Chairman  
Gerald O. Peters, Secretary  
Elaine Tholen, Treasurer  
Adria C. Bordas, Director-Extension  
  
Laura T. Grape, Executive Director



**Contact**  
703-324-1460, TTY 711  
Fax: 703-324-1421  
ConservationDistrict@fairfaxcounty.gov

*Working for Clean Streams and Protected Natural Resources in Fairfax County*

September 7, 2018

Dear Mr. ~~Rosco~~ *Rosco*,



Thank you for involving the Northern Virginia Soil and Water Conservation District at this early stage of the Environmental Assessment for the I-495 Express Lanes Northern Extension Project – VDOT Project # 0495-029-419, P101, UPC 113414.

Attached is our response to the NEPA Scoping questionnaire.

Do let me know if you have any questions based on the responses.

Regards,

A handwritten signature in black ink that reads "Willie Woode".

Willie Woode  
Senior Conservation Specialist,  
703-324-1430  
On behalf of Laura Grape  
Executive Director

Northern Virginia Soil and Water Conservation District

Commented [WW1]:

**Subject: I-495 Express Lanes Northern Extension – NEPA Scoping Questionnaire**  
Fairfax County, Virginia  
State Project Number: 0495-029-419, P101; UPC: I13414  
Federal Project Number: NHPP-0495 (095)

1. Does your agency possess any historic aerial imagery or mapping (i.e. historical National Wetlands Inventories) that might be useful for informing the analyses, specifically for indirect effects and cumulative impacts, conducted in this environmental study?

NVSWCD possesses the 1977 National Wetlands Inventory Maps that include the Falls Church Quad (the area of proposed road extension). The map was prepared by the U.S. Department of Interior –Fish and Wildlife Service.

2. Does your agency possess any data regarding permitted or approved wetland or stream impacts, delineated wetlands, or other past, present, or reasonably foreseeable impacts to natural resources that you believe should be taken into account when considering potential indirect and cumulative effects?

The Fairfax County GIS Layers provide a lot of data regarding the issues mentioned. Additionally, it possesses a county wide watershed management Plan that includes stream restoration and stormwater management projects that may be located the area of proposed road extension activities. Therefore, a review of completed, ongoing and future projects should be reviewed to prevent overlap of practices.

3. Would the proposed project affect erosion and stormwater runoff? If so, what recommendations do you have for alleviating the anticipated problem?

Absence of an adequate E&S control, the impact on sensitive natural resources within this corridor will be significant. Northern Virginia Soil & Water Conservation District (NVSWCD) will be happy to help with the development or review of such plans, as well as its implementation.

4. Do you anticipate any detrimental impact or effect on groundwater?

Existing perched groundwater might be impacted due to road expansion and increase in impervious surfaces. Small localized wetlands may be affected. The impact on the actual aquifers may be insignificant here.

5. Do you have any other concerns regarding soil and water conservation in connection with this project?

NVSWCD's concerns include: Inadequate implementation and maintenance of E&S controls before and through construction, especially with RPA and perennial streams. Impact on existing forests especially north-west of the expansion corridor.

Community reaction to the project's impact of natural resources – these are issues that must be addressed at public meetings before construction starts.

6. Please provide input on potential positive and negative indirect effects to resources under your agency's jurisdiction that could occur as a result of the proposed project. Any pertinent reports or documents that may support your conclusions would be greatly appreciated.

Please see my notes below

7. Please provide information regarding any permits, authorizations, approvals, coordination, or review processes that may be required from your agency for this project.

The NVSWCD is required by Fairfax County to review E&S plans on behalf of the county including development projects that are located within 3 miles from the Potomac River. Furthermore, at anyone's request, the district can review and provide comments regarding E&S control plans for any development project belonging to any government agency, individual, or private industry.

*Northern Virginia Soil and Water Conservation District*

**8. Please provide any other comments or feedback that you feel may be beneficial to the development of this study.**

While no internal or external entity may request such services as mentioned in the response to #7, the district, we would like to offer its expertise at every step of this project, by keeping us in the loop, making us aware of stages as the project plans unfolds, inviting us to public hearings, making available for our review all E&S and stormwater management plans as they are developed.

Response to Question 6:

Negative concerns include: i) Potential adverse impact on natural resources within Scott's Run Watershed (including its streams) due to hydrologic changes, also, changes to the outer limits of Scott's Run Nature Preserve due to increased impervious areas. ii) Possible inadequate studies and protection of cultural resources that may be present.

Benefits the district expects are that: i) unless otherwise recommended, no seeds (such as *Lespedeza cuneate*) listed on the VA DCR, Maryland Exotic Pest Plant Council or USDA Plants list or web pages will be included in the VDOT seed mixes. ii) We strongly encourage inclusion of common, local, native warm season grass species in the revised seed mix. The recommended species should include Indian grass (*Sorghastrum nutans*), Virginia Wild rye (*Elymus virginicus*), Little bluestem (*Shcызachyrium scoparium*), Purpletop (*Tridans flavus*), Deertongue (*Dichanthelium clandestinum*) and broomsedge (*Andropogon virginicus*). Native warm season grasses have been shown through studies conducted by USDA-NRCS and others, to be superior at stabilizing slopes, due to their deep, and massive root systems. They are drought resistant and provide habitat for native species. A seeding rate of about 15 lbs/ac is normally recommended.

It is worth mentioning that the loss of vegetative screening caused significant public controversy during a prior Express Lanes construction (I-95 to Tysons). As a result, VDOT was asked by the General Assembly to issue a report on the best re-vegetation practices for that corridor. The report recommended that "natural landscape" and "managed succession" concepts would be used to create a mix of meadows, transitional areas (mixed meadow and tree canopy), and reforestation areas. In all areas, only plant and tree species native to Virginia would be used, and invasive species would be strictly excluded. In addition, native warm season grass seed would be used to stabilize bare soil, rather than the typical VDOT seed mix. The Fairfax County Restoration Project - a partner with VDOT in creating the Express Lanes Reforestation Plan - created a recommended seed mix for this purpose. VDOT's Express Lanes Reforestation Report can be found online. ([http://www.virginiaodot.org/projects/resources/reforestation\\_final\\_report.pdf](http://www.virginiaodot.org/projects/resources/reforestation_final_report.pdf))



## **Appendix C: Summary of Comments Received Prior to Distribution of EA**

**Correspondence Prior to Distribution of the EA**

<b>Agency/Organization or Event</b>	<b>Date Received</b>	<b>Subject</b>
Public Information Meeting #1	6/11/2018	Public Meeting Comments
Public Information Meeting #1	5/20/2019	Public Meeting Comments
Saigon Citizens Association	6/9/2019	Project Comments
Southern Environmental Law Center	7/11/2018	Project Comments
Southern Environmental Law Center	6/10/2019	Project Comments



**495 EXPRESS LANES NORTHERN EXTENSION STUDY  
COMMENT SUMMARY REPORT  
JUNE 11, 2018 PUBLIC INFORMATION MEETING  
*Federal: NHPP-0495(095), State: 0495-029-419, UPC: 113414***

The Virginia Department of Transportation (VDOT) held a public information meeting on June 11, 2018 at Cooper Middle School in McLean, regarding plans to extend the I-495 Express Lanes by approximately three miles from the Dulles Toll Road interchange toward the Maryland line in the vicinity of the American Legion Bridge. The meeting was held from 6:30 p.m. until 8:30 p.m., and featured an open house period for the public to review displays and ask questions, followed by a presentation at 7 p.m., and a question and answer session.

Meeting materials, including the brochure, presentation and exhibits, were posted on the project website (495NorthernExtension.org) on June 11, 2018. The public was invited to submit comments at the meeting in writing, individually to a court reporter, or verbally during the question and answer session. Written comments were also received by VDOT through the comment period by mail, email or online. The public comment period ended on July 11, 2018.

**Meeting Attendance:**

- Approximately 76 people attended the meeting
- 48 people signed the attendance sheet
- Elected officials in attendance included Delegate Kathleen Murphy, Delegate Jennifer Boysko, Delegate Mark Keam, Fairfax County Supervisor John Foust, and an aide to U.S. Senator Mark Warner
- A representative from one media outlet attended the meeting

**Comments Provided at Meeting:**

- Nine comment sheets were submitted at the meeting
- 12 people spoke during the question and answer session
- No individual comments were provided to the court reporter

**Comments Provided by Mail, Email or Online:**

- 11 comments were received through regular mail, email or online, including:
  - One email was from staff for Delegate Murphy requesting additional information for a community meeting.
  - One letter was received via email from the Southern Environmental Law Center.
  - The other nine comments were from individuals.

**Comments Received and Responses:**

The table below summarizes and responds to comments received during the comment period. Attachment A includes the actual public comments received during and after the meeting, and attachment B is a transcript of the Public Information Meeting presentation and question and answer period.



<b>Summary of Comments Received About the Study</b>		
	<b><i>Public Comment/Question</i></b>	<b><i>Response</i></b>
<b><i>Coordination with Other Jurisdictions</i></b>		
	<p>What is the status of Maryland’s project? How does it relate to this study?</p>	<p>The Maryland Department of Transportation (MDOT) launched its Traffic Relief Plan to reduce traffic congestion, increase economic development, and enhance safety for Maryland commuters. The largest initiative in the Traffic Relief Plan involves evaluating improvements in the I-495 and I-270 corridors. The I-495 and I-270 Managed Lanes study is the first element in Maryland’s efforts to improve traffic congestion. An Environmental Impact Statement (EIS) is underway to identify alternatives and assess potential impacts. The Study limits extend along I-495 from south of the American Legion Bridge to east of the Woodrow Wilson Bridge and along I-270 from I-495 to I-370, including the east and west I-270 spurs. The study is expected to be completed by Spring 2020.</p> <p>VDOT is conducting an Environmental Assessment, which is independent of Maryland’s study, of the option to extend the existing I-495 Express Lanes by three miles to the vicinity of the American Legion Bridge. VDOT also is producing a project implementation and procurement plan, which also would be conducted independent of Maryland’s plans.</p> <p>However, to ensure that both state’s efforts are closely coordinated, project leaders from VDOT and Maryland are meeting and sharing information on a regular basis.</p>
	<p>What does Maryland’s project include? Will Maryland allow high occupancy vehicles? Will the Maryland study include adding lanes to the American Legion Bridge?</p>	<p>In Maryland’s EIS, the Preliminary Range of Alternatives includes fifteen alternatives for consideration in the I-495 and I-270 Managed Lanes Study, which will include the No-Build alternative and corridor-wide solutions that are intended to address congestion along I-495 and I-270, offer more travel mode choices, and enhance travel efficiency. A wide range of alternatives are being evaluated and will include adding general purpose lanes, managed lanes, and transit alternatives. More information on Maryland’s efforts can be found at <a href="https://495-270-p3.com/">https://495-270-p3.com/</a>.</p>

<b>Summary of Comments Received About the Study</b>		
	<b><i>Public Comment/Question</i></b>	<b><i>Response</i></b>
	American Legion Bridge congestion needs to be addressed. Pushing traffic faster toward the bridge without addressing the bridge will accomplish nothing. Are studies being done of ways to add extra lanes to the American Legion Bridge? Is this a priority? Who would be responsible for expanding or rebuilding the American Legion Bridge?	<p>Maryland has primary responsibility for the American Legion Bridge, and its current environmental study limits include I-495 from south of the American Legion Bridge to east of the Woodrow Wilson Bridge and along I-270 from I-495 to I-370, including the east and west I-270 spurs.</p> <p>Any bridge improvements resulting from current studies or otherwise would be coordinated with both Virginia and the Federal Highway Administration.</p>
	The focus should be on working with Maryland on a new bridge or another bridge near White's Ferry.	The Maryland Project is evaluating the operations of the existing bridge and assessing the need to widen or replace the existing American Legion Bridge. The extension of the 495 Express Lanes is one of the regional projects being considered by the Commonwealth of Virginia to provide additional capacity, enhance trip reliability, provide trip choices and improve safety. In addition to this project, regional jurisdictions have developed transportation plans that include a variety of other projects to accomplish these goals. These plans are revised frequently and an additional Potomac River crossing near White's Ferry or elsewhere may be included in future revisions.
	Is the construction of VDOT's proposed express lanes contingent on the approval and completion of construction of Maryland's HOT Lanes and a second American Legion Bridge?	VDOT's Environmental Assessment study is independent of Maryland's study and will produce an implementation plan that will consider options to implement in coordination with Maryland or separately from Maryland, if appropriate. VDOT is meeting regularly with Maryland to share information related to both states' studies as well as the schedule for what Maryland plans to implement. Virginia's decision will be made independent of what Maryland decides.
	Any express lane extension Virginia implements should maintain the current HOT-lane approach that allows carpoolers to use the lanes for free. Virginia officials should encourage Maryland officials to implement HOT lanes so the two states' plans will be compatible.	At this point in the study, VDOT expects an extension would follow the same policies for carpooling that are in place for the existing 495 Express Lanes. VDOT and the project team are coordinating with Maryland to ensure implementation on both sides of the project is as seamless for drivers as possible.

<b>Summary of Comments Received About the Study</b>		
	<b><i>Public Comment/Question</i></b>	<b><i>Response</i></b>
	The District of Columbia should be included as an agency stakeholder, as the condition of Canal Road impacts the use of the American Legion Bridge.	Given the regional nature of I-495, additional jurisdictions will be included as needed as the study and any subsequent project progresses.
<b><i>Environmental</i></b>		
	Concern regarding the loss of hiking trails, specifically between the Live Oak area and I-495.	VDOT will work with partner agencies to preserve as much of the existing trail network as is possible in any project design.
	Site-specific requests for noise monitoring, to include Cooper Middle School and Langley Swim and Tennis Club.	A noise analysis will be conducted during the preparation of the Environmental Assessment. Monitoring sites that are representative of land uses within certain areas will be selected. Monitored sites are simply used to calibrate the noise model, which is used for predicting future noise levels. A noise monitoring plan is typically developed prior to the study and Cooper Middle School may be included as one of the monitoring sites.
	Where will pollution sensors be located? There are three other schools nearby; parkland with hiking trails is adjacent to the Beltway; the health and safety of our children and residents are essential.	The Virginia Department of Environmental Quality (VDEQ) is responsible for the statewide air quality monitoring network; VDOT does not conduct air monitoring. The proposed project site is located between two regional air quality monitors, one in Arlington, the other in Ashburn. There is also a near-road monitor in Springfield, considered to be a worst-case location based on traffic. As necessary, VDOT runs models to estimate peak concentrations at worst-case locations in the air study. If VDOT can demonstrate that the project won't cause or contribute to air quality violations at worst-case locations, then the project will also be compliant at all other locations within the project corridor.
	Will VDOT's NEPA studies coordinate with Department of Environmental Quality (DEQ) guidelines and Governor Northam's Executive Order for enhanced DEQ this year? If so, when and how?	Yes. This coordination has begun and will continue throughout the study.
	Are there currently known levels of pollutants higher than allowed in our area? What are they? Must VDOT consider DEQ studies before building more HOT Lanes in our area?	The Northern Virginia region is in non-attainment status for EPA's 8-hour ozone standard. Ozone is a regional pollutant and not a localized pollutant, since it is not directly emitted from motor vehicles. There are no project-level requirements for ozone that need to be met.



<b>Summary of Comments Received About the Study</b>		
	<b><i>Public Comment/Question</i></b>	<b><i>Response</i></b>
	How long are VDOT's study results allowed to be used for HOT Lanes decision making?	Under the regulations developed for implementation of the National Environmental Policy Act (NEPA), an environmental assessment remains valid for three years. After that period, a re-evaluation would be required before any project could proceed. This practice is common for large transportation projects.
	The proposed expansion provides an opportunity to improve stormwater treatment on the existing portion of I-495.	Any roadway design would be required to meet current state regulations and requirements for stormwater management.
<b><i>Design</i></b>		
	What are potential right of way impacts? Will houses be impacted?	<p>This VDOT study will identify potential right of way impacts for design alternatives to extend the express lanes. VDOT strives to minimize right of way impact, but it's expected that there could be some right of way impact due to the space constraints in this part of the I-495 corridor.</p> <p>Additional information regarding potential right of way impacts will be provided as the study progresses and more information becomes available. Information about right of way acquisition is discussed in VDOT's brochure, "<a href="#">Right of Way and Utilities: A Guide for Property Owners and Tenants</a>", which is available online.</p>
	What do build, no-build, 2025 opening year and 2045 design year mean?	The technical studies will look at conditions under different scenarios, including whether VDOT does or does not build the project (build or no build). In addition, in order to evaluate and compare conditions, the studies will look at an interim year (2025) and a forecasted year (2045) to ensure that the project meets regional transportation needs for a significant time horizon (typically 20 years).
	Can express lanes be built within the existing right of way without reducing the existing general purpose lanes? Taking space away from the general purpose lanes would make it worse for people who are dealing with congestion.	<p>As part of this study, VDOT will conduct a preliminary assessment of potential right of way impacts. At this time, the specific details of potential individual property impacts are undefined. This study will identify a potential project footprint to provide a better idea of the right of way required to construct the project.</p> <p>The design will not take away the existing general purpose lanes.</p>
	Will the project fix the bottleneck at the intersection of Georgetown Pike (VA 193) and the 495 Express Lanes?	Project goals would include reducing congestion and improving safety on I-495 between Tysons and the American Legion Bridge. This would include the congestion where the 495 Express Lanes currently end near Georgetown Pike.

<b>Summary of Comments Received About the Study</b>		
	<b><i>Public Comment/Question</i></b>	<b><i>Response</i></b>
	The project should consider direct access to the express lanes or I-495 from Old Dominion Drive. Can this be included in the EA for further study?	Establishing additional access points to I-495 is not a primary objective of the study, but will be evaluated by the team
	Concern expressed regarding safety and the widths of travel lanes and shoulder lanes; request for 12' lanes.	The project will attempt to use standard 12-foot lanes where possible. There may be some design exceptions where narrower lanes are necessary to mitigate other impacts.
	Concern that the I-495 Express Lanes Northern Extension will exacerbate existing problems with congestion and cut-through traffic near the Balls Hill Road and Georgetown Pike intersection associated with the nearby I-495 access ramps. Request to study and determine the potential impacts and mitigations of a proposed extension. Request for a single northbound lane and restriping at the intersection of Balls Hill Road and Georgetown Pike.	The study includes a traffic analysis that will model traffic operations both on I-495 and on nearby roadways.  VDOT is working separately with McLean-area communities on various traffic and congestion concerns in that area. Learn more at: <a href="http://www.virginiadot.org/projects/northernvirginia/mclean_traffic_analysis.asp">http://www.virginiadot.org/projects/northernvirginia/mclean_traffic_analysis.asp</a>
	Design plans should consider a future shared use path along the American Legion Bridge like was done on the Wilson Bridge.	VDOT is coordinating with Maryland, which is looking at a variety of design options for its portion of I-495 and the American Legion Bridge.
	Adding more lanes will increase traffic, accidents, and drivers looking for alternative routes/bypasses through local and neighborhood streets. Instead, consider: <ul style="list-style-type: none"> <li>• Additional Potomac River crossings to support growth in Loudoun County and commuters from Maryland</li> <li>• Conversion of some existing lanes to “through lanes” to separate interstate drivers from local traffic</li> </ul>	This study is looking at adding capacity and travel options for users of the Capital Beltway by extending the existing 495 Express Lanes Network. It is anticipated that adding capacity and keeping traffic moving on I-495 will help minimize cut-through traffic on local streets.  In addition to this project, the regional jurisdictions have developed transportation plans that include a variety of other projects to address regional transportation needs. These plans are revised frequently and additional Potomac River crossings may be considered separately in the future.

<b>Summary of Comments Received About the Study</b>		
	<b><i>Public Comment/Question</i></b>	<b><i>Response</i></b>
	Incorporate appropriate safe areas for police access and assistance, specifically from Georgetown Pike to River Road.	VDOT will explore design options to accommodate safe areas for police as the design of the facility evolves.
	Residents in the Live Oak area rely on the bridge to access their homes. Replacing the bridge while maintaining access will be tricky.	If a construction project were to impact this community, VDOT would have a coordinated traffic plan to ensure access to this community.
	VDOT should coordinate with transit agencies and Maryland to consider how a project could support expanded mass transit use, to include possible future bus rapid transit along I-495. Consider adding park and ride lots to the project area to improve accessibility and viability of transit for the area.	Multimodal solutions are a top priority to the Commonwealth of Virginia and are key components in many of the major transportation improvements underway in Northern Virginia. The Commonwealth has made a strong investment in ensuring that alternative commute options such as transit enhancements, commuter bus service, park and ride facilities, and transportation demand strategies are part of its recent express lanes projects. As part of this project's procurement and implementation planning, the inclusion of multimodal and other transit improvements as part of the project's scope will be fully considered.
	VDOT should consider additional build alternatives that could reduce the project's footprint, including reversible express lanes or adding one express lane in each direction.	This study is currently focused on an alternative and options with two new express lanes in each direction, but might examine other options as the study progresses.
	VDOT should provide an estimate of the range of toll amounts that drivers can expect to pay to use the express lanes.	Tolls on express lanes are dynamic; prices change based on real-time traffic volumes and speeds in order to manage demand for the lanes and keep traffic moving. As traffic volumes climb, the system responds by raising the toll price to help manage the number of vehicles getting on the roadway and to keep traffic moving at highway speeds.
<b><i>Traffic</i></b>		



<b>Summary of Comments Received About the Study</b>		
	<b><i>Public Comment/Question</i></b>	<b><i>Response</i></b>
	<p>Are there comprehensive traffic studies for I-495 and surrounding neighborhoods?</p> <p>Are there studies that show that the HOT lanes reduce congestion in Virginia, both on I-495 and on neighborhood streets?</p>	<p>Traffic studies were completed as part of the environmental study for the I-495 Express Lanes, as well as the I-495 Shoulder Lane Project. These traffic studies can be found at <a href="http://495NorthernExtension.org">495NorthernExtension.org</a>. Additionally, the Environmental Analysis (EA) that is underway for this project will provide a comprehensive study of traffic on I-495 and in surrounding neighborhoods.</p> <p>About 40,000 vehicles use the I-495 Express Lanes each day, and about 40 percent of these vehicles are traveling as carpools with three or more occupants. Since the first year of operations, there are four times as many carpool trips and 75 percent more bus trips during average weekday trips on the 495 Express Lanes. According to VDOT data, Express Lanes are benefitting all commuters, and have helped to reduce congestion in the general purpose lanes on sections of I-495. Additionally, a <a href="#">National Capital Region Congestion Report</a> produced in the first quarter of 2014 by the National Capital Region's Transportation Planning Board shows that congestion on the region's Interstate System, which includes I-495, was greater in 2010 compared to 2013 and 2014, after the I-495 Express Lanes opened.</p>
	<p>Cut-through traffic in neighborhoods near the Beltway puts local school kids, joggers, and dog walkers at risk. The costs of the stress on the locals, the drivers, and business due to this environment is very much over looked and goes unaccounted for in the addition of lanes.</p>	<p>The study includes a traffic analysis that will model traffic impact both on I-495 and on nearby roadways. VDOT anticipates that adding capacity and managing traffic on I-495 will mitigate cut-through traffic issues.</p>
	<p>Do traffic models consider projected economic growth in Northern Virginia (especially Tysons) and Maryland?</p>	<p>Yes. Traffic models include current information and projections about employment and population growth across the metropolitan region with a planning horizon of 2045. These forecasts are coordinated at the regional level by the Metropolitan Washington Council of Governments (MWCOG) in a cooperative effort with local jurisdictions.</p>
	<p>Will traffic studies capture traffic counts before the end of the school year when there is less traffic?</p>	<p>Yes, the counts were taken in May 2018, prior to the end of the school year.</p>

<b>Summary of Comments Received About the Study</b>		
	<b><i>Public Comment/Question</i></b>	<b><i>Response</i></b>
	Will construction traffic impact studies be conducted?	Construction traffic impact studies occur as part of project design, but are not part of this environmental study. The study team’s preliminary engineering assessment will take constructability and traffic impacts under consideration.
	Growth in Tysons will impact traffic on local streets and needs to be considered as part of a systematic approach.	The traffic models will take into consideration expected growth in Tysons. The study will evaluate traffic conditions on I-495 and local streets in the vicinity of I-495.
	Desire for relief from the morning congestion on the inner loop approaching the American Legion Bridge.	Adding lanes and capacity to I-495 is expected to reduce congestion in the general purpose lanes as well as provide reliable travel times in the Express Lanes.
<b><i>Express Lanes</i></b>		
	Why was the decision made previously to not extend the express lanes to the George Washington Memorial Parkway when the Capital Beltway Express Lanes were built?	The Capital Beltway Express Lanes project stopped around the Dulles Connector Road due to uncertainty about future construction around the American Legion Bridge and in Maryland. Instead, the state took a phased approach.
	Toll roads create demand and cause increased congestion.	Dynamically-tolled Express Lanes are designed to manage demand for the road and keep traffic moving congestion-free and at highway speeds. Solo drivers who choose to pay a toll and use the lanes, and carpoolers who can travel the lanes for free, benefit from a faster and more reliable trip on the Express Lanes. These managed lanes are designed to meet current and projected demand, while providing increased options for drivers.
	The simple solution would be to eliminate the express lanes and add more general purpose lanes.	In the past, partnering with the private sector to build express lanes has given the Commonwealth the ability to build and deliver projects like this in a more timely manner. Eliminating the existing 495 Express Lanes is not feasible because the Commonwealth is in a long-term partnership with a private sector partner.
<b><i>Procurement</i></b>		
	Who would operate the express lanes?	VDOT will conduct a separate project implementation and procurement study that will consider multiple options for express lanes operation, including state and private operation.
	Will Transurban receive a bid contract or no competition contract to build the extension?	The comprehensive agreement between VDOT and Capital Beltway Express (Transurban) does not require VDOT to offer Transurban first right-of-refusal to build an express lanes extension.

## Summary of Comments Received About the Study

	<i>Public Comment/Question</i>	<i>Response</i>
	Would it violate the fair procurement rules for public contracts if a contract is awarded to Transurban?	<p>If a determination is made to proceed with a 495 Express Lanes Northern Extension project, VDOT will explore all options for delivering and financing the project. As with other critical transportation projects, VDOT's top priority is to ensure that taxpayers are protected and that the right project with the right financing is delivered.</p> <p>If a public-private partnership is determined to be the best project-delivery method, this process will be governed by the Virginia Public-Private Transportation Act. If it is determined that Transurban, the Commonwealth's private partner and operator of the 495 Express Lanes, would receive the first right of refusal to deliver this project, Transurban would still be required to meet specific project-delivery and financial criteria as outlined by the Commonwealth in order to proceed.</p>
	<p>May 2021 Update for Revised EA: VDOT has since determined that a study of delivery methods and justification of P3 delivery is not required. Upon further examination of the previous agreement, and in consultation with the Virginia Office of the Attorney General, VDOT concluded that the existing 495 Amended and Restated Comprehensive Agreement (the "ARCA"), executed in 2007 pursuant to the Public-Private Transportation Act of 1995, as amended, provides for project enhancements and the process to carry forward such enhancements, such as the 495 NEXT Project. As such, the 495 NEXT Project is being developed as a Concessionaire Project Enhancement in accordance with the ARCA signed between VDOT and Capital Beltway Express, LLC (CBE).</p>	
	How much does the Commonwealth of Virginia pay Transurban to supplement traffic revenue on the 495 Express Lanes?	VDOT does not pay Capital Beltway Express (Transurban) to operate the 495 Express Lanes.
	General statements opposing public-private partnership (P3) toll roads, private investors, and foreign corporations.	<p>Virginia has had several major express lanes improvement projects in Northern Virginia that were delivered and are being operated by private sector partners to the Commonwealth. Public-private partnership transportation projects are governed under Virginia's Public-Private Transportation Act of 1995. These public-private partnership projects were able to move forward because of their demonstrated ability to provide the best value to Virginia taxpayers while delivering needed transportation improvements. As part of the project's procurement process, it will be determined whether the public-private partnership model will be considered as a possible project delivery method.</p> <p>Although some may oppose paying tolls for various reasons, other travel options will remain on this section of I-495 including general purpose lanes that are free at all times for all travelers.</p>
	<p>May 2021 Update for Revised EA: VDOT has since determined that a study of delivery methods and justification of P3 delivery is not required. Upon further examination of the previous agreement, and in consultation with the Virginia Office of the Attorney General, VDOT concluded that the existing 495 Amended and Restated Comprehensive Agreement (the "ARCA"), executed in 2007 pursuant to the Public-Private Transportation Act of 1995, as amended, provides for project enhancements and the process to carry forward such enhancements, such as the 495 NEXT Project. As such, the 495 NEXT Project is being developed as a Concessionaire Project Enhancement in accordance with the ARCA signed between VDOT and Capital Beltway Express, LLC (CBE).</p>	
	Concern regarding compensation events and lack of public control (e.g., Transform 66 Inside and Outside the Beltway).	VDOT's top priority is to ensure that taxpayers are protected and that the right project with the right financing is delivered. VDOT intends to make the procurement process as transparent as possible.



<b>Summary of Comments Received About the Study</b>		
	<b>Public Comment/Question</b>	<b>Response</b>
<b>Process</b>		
	How did VDOT get \$6 million for the study without holding public information meetings? Who backed it?	The Commonwealth Transportation Board, which governs transportation funding in Virginia, allocated the study funds at its April 17, 2018 meeting.
	How can the public provide input? Additional public input and transparency are necessary. Residents should be invited and engaged more in the process. VDOT should hold additional public information meetings, specifically, during the comment period for the Environmental Assessment (EA).	A public information meeting was held on June 11, 2018. An additional public information meeting will be held in early 2019. Based on the current schedule, a Location Public Hearing will be held in mid-2019, which will include the opportunity for the public to review and comment on the study findings.  More information and a comment submission form can be found on the project website <a href="http://www.495NorthernExtension.org">www.495NorthernExtension.org</a> . Comments can also be provided by emailing <a href="mailto:495NorthernExtension@VDOT.Virginia.gov">495NorthernExtension@VDOT.Virginia.gov</a> or mailing VDOT's Northern Virginia District, Susan Shaw, P.E., 4975 Alliance Drive, Fairfax, VA 22030.
	What is the public process for this study? Who will have final approval?	Based on the current schedule, a Location Public Hearing will be held in mid-2019, which will include the opportunity for the public to review and comment on the study findings. The Federal Highway Administration (FHWA) will have final approval of the environmental analysis (EA) and traffic studies. After FHWA approval has been received, the Commonwealth Transportation Board will review the study's findings.
	Prior studies should be made available online.	Find reports and other documents from previous I-495 studies are available at <a href="http://www.495NorthernExtension.org">www.495NorthernExtension.org</a>
	Were there regional public meetings discussing alternative Potomac River crossings? Additional crossings need to be considered.	A task force established by the National Capital Region Transportation Planning Board (TPB) evaluated a set of 10 initiatives with potential to improve the region's transportation system. An additional northern bridge crossing was considered, but ultimately not included among the five initiatives that the task force recommended for further study and incorporation into the region's long-term transportation plans in 2017. To learn more about the TPB's recommended initiatives for further study, see <a href="https://www.mwcog.org/newsroom/2017/12/06/task-force-recommends-five-initiatives-to-improve-regions-transportation-system-tpb/">https://www.mwcog.org/newsroom/2017/12/06/task-force-recommends-five-initiatives-to-improve-regions-transportation-system-tpb/</a> .
<b>Other</b>		

<b>Summary of Comments Received About the Study</b>		
	<b><i>Public Comment/Question</i></b>	<b><i>Response</i></b>
	<p>The I-495 North Shoulder Lane Use Project caused gridlock by adding another merge area and simply moving the chokepoint closer to before the American Legion Bridge.</p>	<p>The I-495 North Shoulder Lane from the Old Dominion Drive overpass to the George Washington Memorial Parkway off-ramp provides congestion relief for the northbound Beltway by providing additional merge area for the I-495 northbound Express Lanes. The addition of this lane, which is open to traffic only during peak travel times, has not caused gridlock in this area.</p> <p>Based on <a href="#">VDOT's I-495 Auxiliary Lane Study</a>, removing the I-495 North Shoulder Lane would result in minimal change in vehicle throughput on I-495 between Old Dominion Drive and the American Legion Bridge. According to the study, removal of this lane would result in increased delays on the I-495 Express Lanes prior to the area where the Express Lanes merge into the general purpose lanes, as was the case prior to the implementation of the shoulder lane.</p> <p>To improve traffic operations in this section and provide additional congestion relief, the I-495 Northern Extension project would extend the Express Lanes by approximately three miles toward the Maryland line in the vicinity of the American Legion Bridge. This extension would provide additional express lanes in the roadway section where there is currently a shoulder lane.</p>
	<p>Will heavy trucks be permitted to use the 495 Express Lanes? Disappointed with the decision after the NEPA hearings to allow heavy trucks on the express lanes on I-66 outside the Beltway; done very quietly and last minute after the public process.</p>	<p>The study will assess allowing trucks to use this section of express lanes, but a decision has not been made.</p>
	<p>Request for information regarding House Bill 662, including how it originated and potential impacts on residents.</p>	<p>Virginia HB 662 was sponsored in 2018 by Delegate Kathleen Murphy (District 34) and relates to VDOT study and assessment of American Legion Bridge remediation if Maryland were to proceed with bridge improvements. Read more on the General Assembly's website: <a href="https://lis.virginia.gov/cgi-bin/legp604.exe?181+sum+HB662">https://lis.virginia.gov/cgi-bin/legp604.exe?181+sum+HB662</a></p>

**495 EXPRESS LANES NORTHERN EXTENSION STUDY  
MEETING SUMMARY AND PUBLIC COMMENT REPORT  
MAY 20, 2019 PUBLIC INFORMATION MEETING  
Federal: NHPP-495-5(095), State: 0495-029-419, UPC: 113414**



The Virginia Department of Transportation (VDOT) held a public information meeting on May 20, 2019, at Cooper Middle School in McLean regarding plans to extend the I-495 Express Lanes by approximately three miles from the Dulles Toll Road interchange to the vicinity of the American Legion Bridge. The meeting was scheduled from 6:30 p.m. until 8:30 p.m. and featured an open house period for the public to review displays and ask questions, followed by a presentation at 7 p.m. and a question and answer session. The meeting concluded around 9 p.m.

Materials, including the brochure, comment sheet, presentation and exhibits, were available at the meeting and posted on the study's website ([495northernextension.org](http://495northernextension.org)) on May 20, 2019. The public was invited to submit comments at the meeting in writing, individually to a court reporter, or following the meeting by mail, email, and online. Meeting attendees also had an opportunity to ask questions during the question and answer session following the presentation. The deadline for received comments to be included in the meeting summary report was initially set for June 10, 2019, but was extended until June 18, 2019.

**Meeting Attendance:**

- Approximately 225 people attended the meeting
- 207 people signed in
- Elected officials in attendance included Fairfax County Supervisor John Foust (Dranesville District), and representatives from the offices of Congresswoman Jennifer Wexton (10<sup>th</sup> District), Senator Barbara Favola (31<sup>st</sup> District), Senator Jennifer Boysko (33<sup>rd</sup> District), and Delegate Kathleen Murphy (34<sup>th</sup> District).
- Representatives from several media outlets, including Channels 4, 5, and 7 attended the meeting. Additional coverage included WTOP Radio and TysonsReporter.com.
- Representatives from the Maryland Department of Transportation were also on hand with information about the Maryland NEPA study for I-495 and I-270 expansion.

**Comments Provided at the Meeting:**

- Seven comment sheets were submitted at the meeting
- Twenty-three people spoke from the microphone during the question and answer session, including one attendee who spoke twice. Several audience members asked questions, made comments, or otherwise interjected during the question and answer period
- No individual comments were provided to the court reporter

**Comments Provided by Mail, Email or Online:**

- 110 comments were received by mail, email or online, including:
  - 6 comment sheets were received by mail
  - 70 comments were received by email
  - 34 comments were submitted online at [495northernextension.org](http://495northernextension.org)



- Organizations submitting comments included the McLean Citizens Association Transportation Committee, Saigon Citizens' Association, Potomac Heritage Trail Association, and the Southern Environmental Law Center

### **Summary of Comments and Responses:**

Comments and questions received during the comment period (May 1, 2019-June 18, 2019) are summarized and responded to in Attachment A. Attachment B includes the full text of all public comments received.

Comments and questions covered a range of topics, to include:

- Coordination with the Maryland I-495/I-270 project, to include timing, traffic modeling, assumptions, and feasibility
- Need for American Legion Bridge improvements and belief that the project is not worth doing without improving the American Legion Bridge
- Project impact on traffic on roads in McLean and Great Falls, especially on Georgetown Pike and Balls Hill Road
- Support for shared-use path and other bicycle and pedestrian improvements
- Public-private partnerships, project procurement, and the agreement with Transurban
- Concern about impacts on Scotts Run Nature Preserve and the George Washington Memorial Parkway
- Effectiveness of express lanes
- Noise impacts and noise walls
- Right-of-way impacts on nearby properties
- Public involvement and input to the project

Attachment C is the court reporter's transcript of the question and answer session during the May 20, 2019, public information meeting.

**495 EXPRESS LANES NORTHERN EXTENSION STUDY  
MAY 2019 PUBLIC INFORMATION MEETING  
ATTACHMENT A – COMMENT SUMMARY AND RESPONSE**

<b>Summary of Comments Received About the Study</b>		
	<i>Comment/Question</i>	<i>Response</i>
<b>Coordination with Other Jurisdictions</b>		
	Federal Highway Administration	
1	The American Legion Bridge is one of the biggest choke points in the United States. Is the Federal Highway Administration (FHWA) working with Virginia and Maryland to develop a comprehensive solution? What is FHWA’s role? What is FHWA’s position?	The FHWA is the lead federal agency in the preparation of an Environmental Assessment (EA) for the 495 NEXT study. FHWA works with its state Divisions in partnership with state departments of transportation to develop and implement locally appropriate transportation solutions. FHWA is responsible for oversight of state projects which use federal aid.
	Maryland	
2	Are Virginia and Maryland coordinating their efforts? I am deeply concerned about the length of time of disruption. I recommend waiting for Maryland to be ready.	Virginia's 495 Express Lanes Northern Extension study is being developed as an independent, stand-alone project that will be closely coordinated and compatible with plans for I-495 (the Capital Beltway) in Maryland. VDOT has been meeting with the Maryland Department of Transportation (MDOT) on a routine basis. For more information regarding MDOT’s I-495 & I-270 Managed Lanes Study visit <a href="http://495-270-p3.com">495-270-p3.com</a> .
3	<p>Additional lanes should not be constructed in Virginia until Maryland widens the American Legion Bridge. The improvements on I-495 should not be constructed in phases.</p> <p>Maryland recently decided to move forward with improvements to I-270 as Phase One of its project, postponing work on MD I-495 and the American Legion Bridge until an undetermined time in the future. VDOT should lobby MDOT to modify its decision to defer widening the American Legion Bridge until Phase Two or Phase Three of its project.</p> <p>Why is VDOT considering the 495 NEXT project if there is no commitment from MDOT to widen the American Legion Bridge or I-495 on the Maryland side? Why can’t the projects be completed</p>	VDOT is conducting the traffic analysis for the 495 Express Lanes Northern Extension study to assess the effectiveness of the Express Lanes extension independent of projects to widen the American Legion Bridge or expand Maryland’s portion of I-495. More detail about this analysis is available in the Traffic section of this document.

**495 EXPRESS LANES NORTHERN EXTENSION STUDY  
MAY 2019 PUBLIC INFORMATION MEETING  
ATTACHMENT A – COMMENT SUMMARY AND RESPONSE**

	in conjunction with one another? If Virginia is to proceed with its plans, it will be necessary to establish a link to the timing of Maryland's progress. Certainly, no construction should be allowed until there is a firm and irrevocable commitment from Maryland to an opening date for the American Legion Bridge and MD I-495 enlargements.	
	Regional	
4	Add mass transit to address congestion.	The 495 Express Lanes Northern Extension would expand the Express Lanes network in Virginia that promotes carpooling and bus service to move more people by providing faster, more reliable travel in express lanes.
	National Park Service	
5	What is the position of the National Park Service? Will VDOT need to acquire parkland from the NPS, specifically for construction before the American Legion Bridge, the flyover ramp to the GWMP and/or replacement of the existing bridge at Live Oak Drive? If so, what is the process and how long will it take?	Based on the 495 Express Lanes Northern Extension project's proximity and potential impact to two units of the National Park System, the National Park Service (NPS) requested and was granted Cooperating Agency status in the development of the Environmental Assessment. VDOT and NPS have been coordinating on preliminary designs. Efforts to avoid or minimize impacts to park property are being coordinated with the National Park Service. However, the Section 4(f) <i>de minimis</i> provision allows minor takes of property from parkland with NPS concurrence.
<b>Environmental</b>		
	Environmental Assessment	
6	What is the status of the Environmental Assessment (EA)? When will the EA and technical reports be available for public review and comment? Will there be a public hearing?	In collaboration with the Federal Highway Administration, VDOT is preparing an Environmental Assessment to comply with the requirements of the National Environmental Policy Act of 1969 (NEPA), as amended, and 23 CFR Part 771. The EA will evaluate site-specific conditions and potential effects the proposed improvements may have on air quality, noise, neighborhoods, parks, recreation areas, historic properties, wetlands and streams, and other resources. The EA will be informed by the following technical studies:



**495 EXPRESS LANES NORTHERN EXTENSION STUDY  
MAY 2019 PUBLIC INFORMATION MEETING  
ATTACHMENT A – COMMENT SUMMARY AND RESPONSE**

		<ul style="list-style-type: none"> <li>• Air quality analysis;</li> <li>• Alternatives analysis;</li> <li>• Hazardous materials;</li> <li>• Historic resources;</li> <li>• Indirect and cumulative effects;</li> <li>• Natural resources;</li> <li>• Noise analysis;</li> <li>• Socioeconomic and land use analysis; and</li> <li>• Traffic analysis.</li> </ul> <p>Pursuant to federal regulations, the draft Environmental Assessment will be made available to the public a minimum of 15 days prior to the public hearing. However, to the extent practicable, every effort will be made to provide additional time after FHWA’s approval of the document for public availability. It is anticipated that the public hearing will be held in late 2019 or early 2020. There will be a 30-day public review and comment period following the public hearing.</p>
7	Why is VDOT preparing an EA, not an Environmental Impact Statement (EIS)? Is the study being done in compliance with NEPA? Is this level of study adequate?	Pursuant to established procedural guidance, an EA is prepared when the significance of impacts of a transportation project proposal is uncertain. If it is found during the preparation of the EA that significant impacts will result, an environmental impact statement (EIS) will be prepared.
8	Can VDOT provide the raw (not relative) data from the EA and technical studies, as well as the modeling and assumptions used, prior to the next meeting?	The draft EA and its associated technical studies are subject to FHWA approval for public availability. Public availability of these documents will take place a minimum of 15 days prior to the public hearing. The documentation that will be made available to the public will include raw data.
9	Will there be an independent review of VDOT’s studies for FHWA’s decision regarding the environmental document?	FHWA reviews the Environmental Assessment and the associated technical studies and makes an independent finding as to environmental impact.
10	How will potential negative environmental impacts be mitigated? Mitigating environmental impacts may be prohibitively expensive.	Mitigation of environmental impacts differs for various impacts that are identified in the environmental analysis. Mitigation costs would

**495 EXPRESS LANES NORTHERN EXTENSION STUDY  
MAY 2019 PUBLIC INFORMATION MEETING  
ATTACHMENT A – COMMENT SUMMARY AND RESPONSE**

	Who will handle impact evaluations and mitigation costs?	be included as part of the project cost.
11	Request for original 2005 environmental study to be posted online.	Prior VDOT studies from this corridor are now available on <a href="http://www.495NorthernExtension.org">www.495NorthernExtension.org</a> .
	<b>Parks</b>	
12	<p>Public parkland and historic lands should not be used and/or taken. The preliminary design indicates that portions of three parks, our historic byway and the rare and pristine Scott’s Run Nature Preserve will be taken. This will reduce the size and integrity of Scott’s Run, a very important and treasured resource in this community and beyond.</p> <p>Who’s looking out for the future of the community and protecting the parks? Is the taking of park land a significant impact? How will the loss of parkland and the potential impacts on remaining parkland be mitigated? Will VDOT purchase additional parkland to replace the parkland lost to this project?</p>	<p>Public parkland and historic sites are afforded special protection under Section 4(f) of the U.S. Department of Transportation Act of 1966. To meet the requirements of federal law, VDOT must demonstrate that there is no feasible and prudent alternative to the use of these protected properties. However, the law contains provisions for minor (“<i>de minimis</i>”) use of such properties with concurrence from officials having jurisdiction over these sites. Furthermore, VDOT must demonstrate that all possible planning to minimize harm to these sites has been undertaken. Minimization of harm may, and often does, include design modifications and mitigation measures. In addition, parkland which is protected by another federal law, the Land and Water Conservation Fund Act [“Section 6(f)”], may involve replacement of property taken by the project.</p>
	<b>Stormwater Management</b>	
13	Will the 495 NEXT project include stormwater management? How will concerns regarding the safety and aesthetics of specific stormwater management designs located on private property be addressed and/or mitigated? Will property owners be compensated?	Currently, this corridor does not have stormwater management. The 495 NEXT Project would introduce stormwater management as an added benefit to provide the water quality and runoff control that this corridor needs. If right of way needs to be acquired, property owners will be properly compensated. Due to the need for ongoing maintenance, stormwater management facilities are generally not located on private property.
	<b>Noise</b>	
14	Is VDOT conducting a noise analysis as part of the preparation of the EA? How is noise measured? When will information regarding preliminary noise wall locations be provided to the public? What if property owners are concerned about the proposed locations and/or design features of potential noise walls, including potential impacts on private property?	VDOT conducts studies and looks into options for reducing noise levels along proposed federally-funded highway improvement projects, subject to certain qualifying conditions. A noise analysis will be included in the Environmental Assessment (EA). VDOT’s noise abatement policy is based on Federal Highway Administration (FHWA) regulations.

**495 EXPRESS LANES NORTHERN EXTENSION STUDY  
MAY 2019 PUBLIC INFORMATION MEETING  
ATTACHMENT A – COMMENT SUMMARY AND RESPONSE**

		<p>The noise study results and preliminary noise wall locations will be made publicly available with the EA prior to and presented during the public hearing, anticipated to be held in late 2019 or early 2020.</p> <p>Multiple factors determine whether noise walls are feasible and reasonable and where they will be installed, including noise analyses, design plans, and traffic studies. Learn more about Virginia’s State Noise Abatement Policy and noise walls at <a href="http://www.virginiadot.org/projects/pr-noise-walls-about.asp">http://www.virginiadot.org/projects/pr-noise-walls-about.asp</a>.</p> <p>When construction of a noise barrier is considered in the Final Design Phase, it will not be approved without documentation that the affected community has had the opportunity to provide input into the development process. Public involvement allows the community the opportunity to provide input on the characteristics of the proposed noise abatement feature. The abatement design may be further refined to address the community’s comments and to optimize the abatement feature.</p> <p>Subsequent community meetings may allow for further refinement of the abatement design, keeping in mind the acoustic, engineering, and safety considerations.</p>
15	What will be the impact on traffic and noise on the GWMP with and without the additional express lanes ramps from I-495?	Traffic and noise analyses are currently in progress which will address the ramp configuration at the George Washington Memorial Parkway.
<b>Design</b>		
	General	
16	Does the information presented assume that Maryland will construct managed lanes by 2045 on its portion of the Capital Beltway? The presented concepts were confusing and based on assumptions related to Maryland expanding the American Legion Bridge and building additional lanes. Those plans are far from	Yes. Consistent with FHWA requirements, the traffic analysis assumes completion of projects that are in the region’s Constrained Long-Range Plan (CLRP). The CLRP includes managed lanes in Maryland on the American Legion Bridge, I-495, and I-270.



**495 EXPRESS LANES NORTHERN EXTENSION STUDY  
MAY 2019 PUBLIC INFORMATION MEETING  
ATTACHMENT A – COMMENT SUMMARY AND RESPONSE**

	concrete.	
17	Will this project increase the number of lanes between the Dulles Toll Road and GWMP? Will new express lanes be constructed? Will the number of general purpose lanes be reduced?	There will be two express lanes and four general purpose lanes plus auxiliary lanes in each direction. No reduction in general purpose lanes.
18	I like keeping the express lanes entrances/exits on the inside of the Beltway and toward the river wherever possible, with less disruption to feeder roads and property values.	Comment noted.
19	Support extending the express lanes to the American Legion Bridge. The current terminus prior to the Georgetown Pike exit and the GWMP creates a dangerous and delaying crossover. The current configuration also creates multiple pinch points.	Comment noted. Barrier separated express lanes and ramps can address some of the merging and crossover movements that now occur.
20	An upfront commitment by VDOT to work with the community to solve cut-through traffic if the new Northern Extension Project in fact does not sufficiently alleviate cut-through traffic. A contingency trigger that would limit use of certain streets within certain hours to non-residents seems to be a fair tradeoff for moving forward with current VDOT plans and assurances.	VDOT conducted an extensive analysis of traffic in McLean to identify strategies to improve traffic flow and reduce cut through traffic in McLean. VDOT remains engaged in this process working with Fairfax County DOT, local elected officials, and the McLean Traffic Advisory Group. Learn more about the study online. <a href="http://www.virginiadot.org/projects/northernvirginia/mclean_traffic_analysis.asp">http://www.virginiadot.org/projects/northernvirginia/mclean_traffic_analysis.asp</a> .
	American Legion Bridge	
21	Adding two express lanes without expanding the American Legion Bridge will simply move the existing bottleneck, instead of solving it. The bridge can't handle the traffic volume.  There is absolutely no need for this HOT lane extension project. When the American Legion Bridge gets widened, this will reduce the back up on the Beltway. Nothing else will solve the congestion issue.	The traffic analysis is not yet available. Without increased capacity on the American Legion Bridge, some degree of congestion would remain. The traffic analysis is expected to show that this amount will be reduced somewhat.
22	Has VDOT considered overlapping the left lanes of northbound and southbound I-495 on the last curve before the American Legion Bridge?	Double-decking of roadways creates a host of issues regarding operations, future maintenance responsibilities, and increased construction cost. This scenario is not considered practical for this location.
23	How will the six lanes (two express lanes and four general purpose lanes) merge onto the four-lane bridge itself?	One of the two express lanes would transition to be the ramp to the George Washington Memorial Parkway. The other lane would merge

**495 EXPRESS LANES NORTHERN EXTENSION STUDY  
MAY 2019 PUBLIC INFORMATION MEETING  
ATTACHMENT A – COMMENT SUMMARY AND RESPONSE**

		with the general purpose lanes prior to the bridge.
	George Washington Memorial Parkway	
24	Like the special new connection to GWMP and extra lanes.	Comment noted.
25	Concerned about the proposed flyover ramps that will connect the express lanes to the GWMP.	New layers of ramps will not be needed. The proposed flyover ramps are at the same level as the existing ramps.
26	Any flyover ramp from northbound GWMP traffic should incorporate a road surface that silences tire noise. Lowering preventable decibel levels, even if not required strictly by EPA guidelines, should be a community-focused goal within VDOT's general mission statement.	The materials selected for the project will be consistent with VDOT policies and practices. Special conditions noted in this comment will be considered.
27	The correct solution to the inner loop backup problem is adding more lanes from the George Washington Parkway to across the bridge and to resolve the I-270 split choke point.	The Maryland Congestion Relief program is intended to address these issues. VDOT is coordinating with Maryland representatives to ensure that a Virginia project would be constructed in a way that accommodates the Maryland project.
28	I am concerned about the additional exit at GWMP as it might confuse drivers.	The Express Lanes and general purpose lanes will have separate signage guiding motorists.
	Live Oak	
29	Concerned about the proposed flyover near Green Oak Drive.	The options and locations for the exchange ramps providing access between the express and general purpose lanes are under review.
30	Please do not extend the HOT lanes or widen the beltway in the Georgetown Pike vicinity this will not ease the congestion over the Legion bridge we do not want our surrounding neighborhood impacted; we do not want Live Oak Drive or the sound walls next to it impacted.	The proposed Virginia facilities will complete the system of Express Lanes and accommodate similar facilities being planned in Maryland for congestion relief.  Locations of noise barrier walls are being determined. Impacted residents will have an opportunity to receive information on the new noise barrier walls through public outreach activities and cast votes to determine inclusion in the project. Communities that have noise walls today would have noise walls after construction, as well.
	Georgetown Pike	
31	Comments supporting: that the approaches to the I-495/Georgetown Pike interchange will be widened; dedicated through lane for eastbound traffic on Georgetown Pike; no Express Lanes exit at Georgetown Pike.	There is no proposed Express Lanes connection at Georgetown Pike. A separate VDOT/Fairfax County project is underway to improve traffic flow at Georgetown Pike and Balls Hill Road. Improvements to Georgetown Pike and I-495 are being considered as part of this

**495 EXPRESS LANES NORTHERN EXTENSION STUDY  
MAY 2019 PUBLIC INFORMATION MEETING  
ATTACHMENT A – COMMENT SUMMARY AND RESPONSE**

		project.
32	Comments in support and opposition to previous VDOT study of closing the ramp from Georgetown Pike to I-495 North.	VDOT studied weekday afternoon closure of the ramp from Georgetown Pike to I-495 North. Based on public feedback and study results, this approach was not implemented.
33	Concerned about safety and that there are no plans to help mitigate congestion in front of and access to Cooper Middle School.	An operational and safety improvement project is currently under construction to add a third lane to northbound Balls Hill Road at the intersection with Georgetown Pike, providing separate lanes for vehicles turning left, proceeding straight, and turning right. While these improvements will not solve all of the congestion in the area, it will reduce backups during peak periods, improve access for residents traveling to the north side of Route 193 on Balls Hill Road, and improve access to and from Cooper Middle School. The I-495 study is conducting an assessment of existing and future safety conditions. Mitigation measures will be implemented where necessary.
34	Replace the existing Georgetown Pike Bridge with a structure in keeping with the Pike’s historical byway status. Chain link fencing, and concrete rather than stone construction, would totally destroy the byway character of Georgetown Pike. Furthermore, a sidewalk and bike-path that do not, and never will, join other sidewalks/paths would be an irresponsible design. We and a majority of our neighbors in the community want the bridge as compact as possible since we have no intention of going near the new Beltway on foot or bicycle with its increased noise and grit.	The materials selected for the project will be consistent with VDOT policies and practices, to include context sensitive design principles.  Regarding the sidewalk and bike paths, the project is coordinating with Fairfax County to incorporate portions of the Fairfax County Bicycle Master Plan (2014) that are adjacent to bridges and roadways being reconstructed.
35	Will the access point onto the southbound Express Lanes on the outer loop of 495 remain the same, for those entering 495 at 193, or will it be moved? (I like it where it is).	Access to the southbound Express Lanes from Route 193 will likely remain as shown. There are no direct connections to the Express Lanes planned from the Route 193 bridge.
36	I am shocked and disappointed that you would consider rebuilding the Georgetown Pike interchange bridge and still not address the congestion issues caused by the current HOT lanes the shoulder expansion project. Currently VDOT has a “working area” on the SE corner of the intersection. That could be relocated and a circular ramp could be built to accommodate the	Design options are being considered that would improve traffic flow from Georgetown Pike to I-495 north. Introducing a tight loop ramp would not help improve traffic operations at this merge.  VDOT Maintenance uses the referenced lot near the interchange and intends to continue its use. A portion of this site is being considered



**495 EXPRESS LANES NORTHERN EXTENSION STUDY  
MAY 2019 PUBLIC INFORMATION MEETING  
ATTACHMENT A – COMMENT SUMMARY AND RESPONSE**

	eastbound traffic entering 495. This would help significantly with the flow onto the beltway from the eastbound traffic.	for stormwater management as well.
	Old Dominion Drive	
37	Add on and off ramps to the bridge at Old Dominion Drive to spread out the load on Georgetown Pike.	No ramp connections are proposed at this location.
	Lewinsville Road	
38	Add on and off ramps to the bridge at Lewinsville Road to reduce traffic on Georgetown Pike.	No ramp connections are proposed at this location.
	Dulles Toll Road	
39	There should to be a ramp from the southbound Beltway to the Dulles Access Road. Currently, it is very difficult to cross over the toll road to get to the access road, especially if there is heavy traffic.	Building the ramp movement suggested is not included as part of the 495 NEXT Project. However, this ramp connection is expected to be constructed before 2030, as documented in the regional Constrained Long-Range Plan.
<b>Traffic</b>		
	Analysis	
40	Has VDOT performed an analysis under a scenario in which Maryland constructs its project and Virginia does not do anything? When will the results be available?  When will the results regarding the no-build scenario be available (assuming Maryland proceeds with its project)?	Yes. The No-Build Alternative, for the purposes of NEPA documentation, assumes that Virginia will not extend the existing express lanes on I-495 and Maryland will construct improvements on its portion of I-495, including widening the American Legion Bridge. Preliminary traffic operations analysis results for the 2045 design year were provided during the May 20, 2019 public information meeting and are available on the project website. The traffic analysis results for the 2025 interim year No-Build and Build will be shared with the public in advance of the public hearing.
41	Since it is uncertain whether or when Maryland will construct expanded capacity on I-495 at the American Legion Bridge, it is essential that VDOT provide the public with information on the expected traffic impacts on the I-495 mainline, arterials, and secondary streets within the study corridor, including impacts on cut-through traffic, both in 2025 and 2045, if (a) the I-495 Express Lanes Northern Extension has been built, but Maryland has not constructed expanded capacity on I-495 at the American Legion Bridge, and (b) neither the I-495 Express Lanes Northern	VDOT is developing an analysis of 2025 No-Build and Build operations without Maryland’s improvements in place. This 2025 analysis is currently in progress, and findings will be made available when completed. 2045 analyses without the Maryland improvements in place will also be conducted later this year.  Based on the analysis, VDOT will document the benefits for drivers travelling between the George Washington Memorial Parkway and the Dulles Toll Road and vice versa, without widening of the

**495 EXPRESS LANES NORTHERN EXTENSION STUDY  
MAY 2019 PUBLIC INFORMATION MEETING  
ATTACHMENT A – COMMENT SUMMARY AND RESPONSE**

	<p>Extension nor expanded capacity on I-495 at the American Legion Bridge have been built.</p> <p>VDOT has not shown the utility of constructing some or all of this project without Maryland building its portion. It should not proceed unless VDOT shows that it is a good agreement for Virginia’s taxpayers and that the phased express lanes will improve traffic congestion without Maryland’s plans and a new bridge in place.</p> <p>What are the traffic congestion impacts of a phased approach to the choke point before the current American Legion Bridge and other choke points, including the I-267 interchange, ramps to/from the Dulles Connector Road, and ramps to/from Route 123 during rush hour without other I-495 or American Legion Bridge projects?</p> <p>Make available to the public the data and analysis underlying VDOT’s assessment that 495 NEXT will have benefits in Virginia that are not dependent on Maryland having implemented its own measures.</p>	<p>American Legion Bridge or inclusion of the Maryland I-495 proposed improvements.</p>
42	<p>Any increase in Virginia traffic would only compound the very severe congestion problem on the Beltway. That should not be allowed to happen.</p>	<p>Comment noted.</p>
43	<p>Conduct traffic studies on multiple days (e.g., Monday-Friday between 4 p.m. and 7 p.m.).</p>	<p>Traffic analysis is based on data collected across Tuesday, Wednesday, and Thursday, collected for all hours of the day on the interstate and freeway sections and for four hours in the morning and four hours in the evening on the adjacent and perpendicular arterials, as well as local streets and intersections.</p>
44	<p>The meeting presentation showed a chart on “Increased Person Throughput.” Do you have this slide based on “Increased Vehicle Throughput”? It is very irregular to show traffic measures in terms of people because you can easily manipulate the results by</p>	<p>Final traffic analysis results will be made available providing both forecasted vehicle throughput and person throughput. Factors for vehicle occupancy will be based on empirical data for toll-paying and non-toll-paying vehicle percentages and forecasted HOV-3+ usage</p>

**495 EXPRESS LANES NORTHERN EXTENSION STUDY  
MAY 2019 PUBLIC INFORMATION MEETING  
ATTACHMENT A – COMMENT SUMMARY AND RESPONSE**

	changing the number of people in the vehicles. The only way to reduce the congestion is to reduce the vehicles.	according to the regional travel demand model.
45	There is a wide body of research detailing the impact of building new roads on traffic -- in fact, after an initial improvement, traffic returns to the same levels as before, for several well-documented reasons.	The proposed project within Virginia does not add general lanes, but adds Express Lanes, which can be managed to control the flow of traffic and speeds on the facility.
	General	
46	I like the possibility that congestion in the area may eventually be relieved.	Comment noted.
47	What will be done to manage the additional bottlenecks caused by construction?	VDOT and the Developer / Design-Contractor will develop and maintain a project Transportation Management Plan that will address traffic operations issues during construction.
48	Is there a specific proposal to improve safety and address speeding on I-495 (not just for this segment of I-495)?	The project analysis includes a detailed crash and safety analysis to identify safety issues and the assessment of mitigation improvement strategies to address the identified safety issues.
49	One of the major issues to be addressed is the ability of the police to monitor and control traffic from Georgetown Pike to the Maryland side of the American Legion Bridge. Input from the Maryland State Police should be included in the design criteria for patrolling and enforcement areas.	Traffic enforcement issues are being coordinated with appropriate law enforcement authorities.
	George Washington Memorial Parkway	
50	How will the project affect the George Washington Memorial Parkway?	The National Park Service (NPS) is responsible for maintenance of the George Washington Memorial Parkway (GWMP). NPS has asked VDOT to look at an option that would not include any new express lanes connections to the GWMP. If it is determined that there will be connections to the GWMP, future discussions between VDOT and NPS could include potential mitigation strategies. VDOT and Maryland are continuing to coordinate with NPS on proposed connections to and from the Parkway. Preliminary traffic analysis results show that there are nominal impacts to the through traffic on the GWMP to and from I-495 with the proposed VDOT project in place.
	Live Oak	



**495 EXPRESS LANES NORTHERN EXTENSION STUDY  
MAY 2019 PUBLIC INFORMATION MEETING  
ATTACHMENT A – COMMENT SUMMARY AND RESPONSE**

51	<p>Live Oak Drive and Balls Hill Road becoming a through street seems counterproductive and harmful to McLean communities and could add more traffic to Georgetown Pike and more congestion to the 495/193 intersection.</p>	<p>Traffic analysis results will include an assessment of the impact of the proposed improvements on parallel local facilities, including Georgetown Pike and Balls Hill Road.</p> <p>The proposed project is anticipated to reduce cut-through traffic on neighborhood streets and roads parallel to the Beltway.</p>
	Georgetown Pike	
52	<p>Concern regarding traffic volumes on and near Georgetown Pike and Balls Hill Road, which impacts local residents.</p> <p>After the 495 Express Lanes opened, there was a drastic increase in traffic on Georgetown Pike.</p>	<p>Traffic analysis results will include an assessment of the impact of the proposed improvements on parallel local facilities, including Georgetown Pike and Balls Hill Road.</p> <p>Traffic volume has increased on the Beltway and Georgetown Pike since the implementation of the 495 Express Lanes. This is attributable to large increases in population and employment in the region, especially in the northern part of Fairfax County (Tysons, Merrifield, Reston, and Herndon).</p> <p>With respect to cut-through traffic, the widespread use of GPS navigation has resulted in increased traffic on local arterials (Balls Hill Road, Georgetown Pike, etc.) as alternatives to the congested I-495.</p>
53	<p>The Route 7 Corridor Improvements Project will also have a huge impact on this area during construction. Can timely and periodic reviews of the traffic impacts be conducted?</p>	<p>The Route 7 Corridor Improvement Project will improve traffic flow on Route 7 and provide some traffic relief for alternative routes being used by commuters. If 495 NEXT construction overlaps with Route 7 Corridor Improvements Project work, VDOT will work with its construction partners to expand its regional traffic management plan to factor in the combined impact of the projects.</p>
	Local Roads	
54	<p>How does the Express Lane extension help to alleviate the already serious and constantly increasing flow of cut-through traffic on McLean's residential streets? Can anything be done about the Maryland commuters clogging up our neighborhood streets? Ideally, only residents on Swinks Mill Road should be allowed to</p>	<p>Traffic analysis results will include an assessment of the impact of the proposed improvements on parallel local facilities, including Georgetown Pike and Balls Hill Road.</p>

**495 EXPRESS LANES NORTHERN EXTENSION STUDY  
MAY 2019 PUBLIC INFORMATION MEETING  
ATTACHMENT A – COMMENT SUMMARY AND RESPONSE**

	access that road during rush hour.	
55	"Local Traffic Only" signs should be installed on side roads to prevent/curtail cut through traffic with police enforcement.	VDOT and Fairfax County have undertaken a study to assess traffic calming measures to reduce cut-through traffic in McLean neighborhoods near the Beltway.
56	What are the phased construction and traffic congestion impacts for I-495 and surrounding neighborhoods throughout construction? How will traffic impacts be mitigated?	Traffic analysis results will include an assessment of the impact of the proposed improvements on parallel local facilities, including Georgetown Pike and Balls Hill Road.
<b>Other Roadways</b>		
57	Will additional construction occur in other areas identified on the Study Area Map (Dulles Toll Road, Spring Hill Road, Route 123, etc.)? If so, when will those details be included in the study?	The preliminary design does not include any improvements on other roadways. However, VDOT will look at those areas to determine whether there are any hot spots that would need to be addressed moving forward. More information will be available when the traffic analysis is completed.
<b><i>Bicycle &amp; Pedestrian</i></b>		
58	At least 10 comments received expressed support for shared-use trail and overpass improvement components of the proposed design. One comment from a nearby resident referred to it as a waste of money that they won't use.	Comments noted.
59	Does the preliminary design include improvements for bicyclists and pedestrians? Will the shared use path connect to the Scotts Run Nature Preserve and Potomac Heritage National Scenic Trail, as well as future expansion of the American Legion Bridge and trails in Maryland? Will recommendations from the community be considered? What if residents adjacent to the proposed shared use path are concerned about privacy and safety?	<p>VDOT has been coordinating with the Fairfax County Department of Transportation regarding potential trails along the I-495 Corridor. The preliminary design includes improvements for bicyclists and pedestrians consistent with Fairfax County's Bicycle Master Plan.</p> <p>The preliminary design includes a 10-foot-wide, paved shared-use path along I-495 behind the noise wall between Old Dominion Drive and Georgetown Pike, and on-road facilities using local roadways connecting Georgetown Pike and Live Oak Drive. Improvements are also planned for the Old Dominion Drive, Georgetown Pike, and Live Oak Drive overpasses, to include improving access to Cooper Middle School. This project does not include direct trail access to Scotts Run Nature Preserve.</p> <p>As requested by the National Park Service, there will be no</p>

**495 EXPRESS LANES NORTHERN EXTENSION STUDY  
MAY 2019 PUBLIC INFORMATION MEETING  
ATTACHMENT A – COMMENT SUMMARY AND RESPONSE**

		<p>connections between the proposed shared-use path along I-495 and the Potomac Heritage National Scenic Trail, which accommodates only foot traffic.</p> <p>Community input is welcome related to proposed trail as part of this project and future projects.</p>
60	<p>We applaud several aspects of the project. It is good that a trail is being built from Old Dominion north beyond the GW Parkway, to a point where it can access the American Legion Bridge and C&amp;O Towpath if/when Maryland widens its part of I-495. It is a huge benefit to trail users that they will be on the QUIET side of the sound wall, where there is significant wooded land and relatively clean air.</p> <p>We believe the new trail alongside Old Dominion should be on the SOUTH, not the NORTH side to provide same-side access for many more homes. A trail underpass of Old Dominion at the Beltway can serve as a safe and scenic route for the Potomac Heritage National Scenic Trail from Scotts Run Nature Preserve to Timberly Park and on to Bullneck Run Stream Valley Park and Spring Hill Recreation Center.</p> <p>We also encourage you to extend the sound wall trail south from Old Dominion to Lewinsville Road as part of the project. This trail appears in the VDOT design, but only for 2045. It will create shorter hike/bike routes for many additional neighborhoods. We strongly support links from this segment into the neighborhoods (e.g. to Old Gate from the east) as shown in the VDOT map.</p>	<p>A trail connection between Old Dominion and Lewinsville Road has been added to the proposed design being considered.</p> <p>The proposed design includes the trail on the north side of Old Dominion Drive, which is consistent with the Fairfax County Bicycle Master Plan (2014). This location provides a reasonable connection to the proposed trail north of the Old Dominion Drive crossing and adjacent to the southbound general purpose lanes between Old Dominion Drive and Georgetown Pike that will be constructed with this project.</p>
<b>Right of Way</b>		
61	<p>When will additional information about potential right of way impacts be available? What is the estimated amount of impacted right of way?</p>	<p>Planning-level right of way estimates indicate that the Build Alternative would require a maximum of approximately 7.1 acres of permanent fee-simple right of way, and 29.7 acres of temporary right of way for construction of the proposed improvements. No full</p>



**495 EXPRESS LANES NORTHERN EXTENSION STUDY  
MAY 2019 PUBLIC INFORMATION MEETING  
ATTACHMENT A – COMMENT SUMMARY AND RESPONSE**

		<p>property acquisitions or relocations are proposed. Planning-level estimates are subject to change as the project design advances.</p> <p>Additional information on right of way impacts will be provided in the forthcoming I-495 Express Lanes Northern Extension socioeconomic technical report and associated Environmental Assessment.</p>
62	<p>Will any residential properties be impacted? If so, how will property owners be compensated? Will VDOT assist with relocation services?</p>	<p>At this time, no full property acquisitions or relocations are anticipated. Partial property acquisition would be conducted in accordance with VDOT policy, as well as all applicable Federal laws, regulations and requirements, including but not limited to 23 CFR §710, the <i>Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970</i> (49 CFR §49, as amended). All property owners affected by Federally-assisted projects will be treated fairly, consistently, and equitably so that they do not experience disproportionate effects as a result of projects that are designed for the benefit of the public as a whole.</p> <p>Additional information about VDOT’s right of way acquisition procedures is provided at <a href="http://www.vdot.virginia.gov/business/resources/Right_of_way/A_Guide_for_property_Owners_and_Tenants.pdf">www.vdot.virginia.gov/business/resources/Right_of_way/A_Guide_for_property_Owners_and_Tenants.pdf</a>.</p>
<b>Express Lanes</b>		
63	<p>Why isn’t VDOT proposing to add general purpose lanes? Has VDOT considered adding a High Occupancy Vehicle (HOV) lane and a toll-only lane with access ramps to encourage carpooling?</p> <p>Why are the express lanes and general purpose lanes separated?</p>	<p>The VDOT proposed design includes HOT (High Occupancy/Toll) lanes, which is consistent with the adjacent Capital Beltway Express Lanes and other Express Lanes facilities in Northern Virginia. Combining toll and HOV traffic in two lanes helps the Express Lanes move more people at more reliable speeds than simply adding more general purpose lanes or separating out carpools from toll-paying drivers.</p>
64	<p>It does not appear that anyone is using the existing 495 Express Lanes. They appear to get limited use because the access ramps are limited and, in most cases, do not line up with normal</p>	<p>In 2012, the 495 Express Lanes added capacity on the Capital Beltway, with two new lanes in each direction and new access points at Tysons and Lee Highway. The access ramp locations were chosen</p>

**495 EXPRESS LANES NORTHERN EXTENSION STUDY  
MAY 2019 PUBLIC INFORMATION MEETING  
ATTACHMENT A – COMMENT SUMMARY AND RESPONSE**

	<p>Beltway access ramps, and HOVs require a special E-ZPass.</p> <p>Do express lanes reduce congestion on I-495 and in surrounding neighborhoods? Does the traffic match the model? Where is the study? How will the express lanes ease congestion?</p>	<p>based on an assessment of the areas of greatest future demand, which included roads that did not have access to the Beltway. In 2018, the 495 Express Lanes carried roughly 30,000 trips on an average weekday, which represents a 50% increase from the average 20,000 daily trips in the Express Lanes in 2013. Representing approximately 13-18% of the total average daily trips on the Beltway through the Tysons area, the additional capacity draws vehicles and relieves pressure from the general purpose lanes and parallel arterials during peak traffic periods. Express lanes on I-495, I-95, and I-66 Inside the Beltway provide faster, more reliable trips to encourage carpool and vanpool trips. Approximately 15-20% of the vehicles using the I-495 Express Lanes during the peak periods are HOV. Like with the general purpose lanes, traffic volumes vary by hour of day and day of week.</p> <p>During the 2012 opening year of the 495 Express Lanes, initial traffic volumes were lower than projected. Since that time, the traffic volume targets have been reset, and today traffic volumes exceed expectations. The original traffic studies for the I-495 Express Lanes were made publicly available in area libraries and on the VDOT project website for five years, beginning in 2008. The updated traffic study for the 495 NEXT Project will be made publicly available in the fall of this year, prior to the public hearing. Based on initial forecasting analysis results, the proposed project is anticipated to reduce cut-through traffic on roads such as Balls Hill Road, Dead Run Drive, and Swinks Mill Road, with anticipated volume decreases of 10-25%. By providing additional capacity and travel time reliability on I-495, the proposed Express Lanes extension is anticipated to reduce the congestion on parallel and neighborhood streets.</p>
65	<p>Express lanes are unaffordable to the average commuter on a daily basis. How much will it cost to travel in the express lanes?</p>	<p>Travelers in vehicles with three or more occupants (HOV-3) and buses will travel free with an E-ZPass transponder in “flex mode”.</p> <p>Travelers in vehicles with fewer than three occupants can choose to</p>

**495 EXPRESS LANES NORTHERN EXTENSION STUDY  
MAY 2019 PUBLIC INFORMATION MEETING  
ATTACHMENT A – COMMENT SUMMARY AND RESPONSE**

		<p>use the express lanes and pay a toll. Like with the tolls on I-495, I-95, and I-66 Inside the Beltway, toll rates will vary based on traffic volumes to allow for smooth flow of traffic. The price will generally increase as more vehicles enter the express lanes and will decrease when there are fewer vehicles.</p>
<b>Procurement</b>		
66	<p>How was Transurban selected?</p> <div style="border: 2px solid red; padding: 5px;"> <p>May 2021 Update for Revised EA: VDOT has since determined that a study of delivery methods and justification of P3 delivery is not required. Upon further examination of the previous agreement, and in consultation with the Virginia Office of the Attorney General, VDOT concluded that the existing 495 Amended and Restated Comprehensive Agreement (the "ARCA"), executed in 2007 pursuant to the Public-Private Transportation Act of 1995, as amended, provides for project enhancements and the process to carry forward such enhancements, such as the 495 NEXT Project. As such, the 495 NEXT Project is being developed as a Concessionaire Project Enhancement in accordance with the ARCA signed between VDOT and Capital Beltway Express, LLC (CBE).</p> </div>	<p>Transurban currently operates the Express Lanes on I-495 under an Amended and Restated Comprehensive Agreement (ARCA) with the Commonwealth. The ARCA allows project enhancements to be considered, but neither the state nor Transurban is obligated to accept.</p> <p>In January 2019, VDOT signed a Development Framework Agreement with Transurban to extend the 495 Express Lanes under the existing 495 Express Lanes ARCA with no funding from the Commonwealth.</p> <p>VDOT will compare implementing this project under both public and private (P3) delivery methods and will determine which delivery method is in the best interests of the Commonwealth. Subject to VDOT approval, Transurban has an opportunity to submit a binding proposal that meets project-delivery technical and financial criteria and all the commitments established in the environmental study.</p>
67	<p>Would VDOT consider this project if Transurban was not paying for it? Does VDOT have the option to cancel the agreement with Transurban? What happens to compensation for the contractor if a decision is reached to not do the project?</p> <p>This is an environmentally and socially irresponsible use of public land to benefit a privately-held company and not the majority of residents or commuters of Virginia.</p> <p>These toll roads profit by increasing congestion and will always need a fix where they end. As with 66 Outside the Beltway,</p>	<p>This segment of the Capital Beltway is the most congested highway segment in the Washington metropolitan region. Identifying and implementing a solution is one of VDOT's top priorities. Anticipated cost of the Phase 1 Improvements is roughly estimated to be in the \$500 million range, far exceeding the amount of available funds.</p> <p>Extending the 495 Express Lanes is included in the Washington Capital Region's Constrained Long-Range Plan. The 495 Express Lanes Northern Extension study included a component for VDOT's Office of Public-Private Partnerships to analyze various options for procurement. Transurban will have opportunity to submit a binding</p>



**495 EXPRESS LANES NORTHERN EXTENSION STUDY  
MAY 2019 PUBLIC INFORMATION MEETING  
ATTACHMENT A – COMMENT SUMMARY AND RESPONSE**

	Virginia is selling taxpayer funded roads to foreign investors. Time for VDOT to build our roads and if tolls are needed, Virginia can collect and give back to taxpayers through other road improvements.	proposal to complete the project. VDOT will have the ability to accept or reject Transurban’s binding proposal as appropriate. The agreement lays out cost sharing responsibilities should Transurban’s binding proposal be accepted or rejected by the department or if the agreement terminated.
68	What are the terms and conditions of the agreement, including the duration and what happens afterwards?	The Development Framework Agreement is not subject to public disclosure. The 495 ARCA sets an end date of 2087 for the agreement with Transurban; the 495 Northern Extension would be included as part of this 495 Express Lanes agreement. The 495 ARCA can be found here: <a href="https://www.p3virginia.org/projects/i-495-express-lanes/">https://www.p3virginia.org/projects/i-495-express-lanes/</a> Should an agreement be reached with Transurban, it is anticipated that revisions will be made to the current ARCA.
69	To what extent are the economic benefits to Transurban offset by payment to the Commonwealth for acquiring and/or using public land?	In addition to the improvements to regional mobility, the deal would include stipulations for revenue sharing that goes back to the public if certain levels are exceeded. At the conclusion of Transurban’s agreement with the Commonwealth, the operation and maintenance of the express lanes will be assumed by VDOT.
70	Aside from the agreement with Transurban, what other options did the Commonwealth consider for funding and financing the project? Has an analysis of the alternatives been done? How does the agreement compare to other funding sources, such as raising taxes or issuing specific bonds?	VDOT is performing a study to analyze a publicly funded and administered alternative as well as a competitively bid P3 alternative. May 2021 Update for Revised EA: VDOT has since determined that a study of delivery methods and justification of P3 delivery is not required. See comment #66 above for additional information.
71	How does VDOT protect the public against price gouging by the private partner? Are there any restraints on the toll rates established and charged by Transurban? What oversight and control does VDOT exercise over Transurban?	Transurban sets toll prices using a dynamic pricing algorithm to maintain prescribed levels of service for HOV and toll-paying vehicles. The VDOT agreement includes provisions where revenues beyond a certain threshold are shared with the state.
72	What is the estimated cost of the project? What financial data will VDOT disclose about the P3 contract and express lanes operations?	The concept level estimate is \$500 million, which includes the addition of express lanes and interchange connections, as currently shown, between the Dulles Toll Road and the George Washington Memorial Parkway. The estimate does not include any costs to reconstruct or modify the American Legion Bridge.  State law prescribes what information can and cannot be released.

**495 EXPRESS LANES NORTHERN EXTENSION STUDY  
MAY 2019 PUBLIC INFORMATION MEETING  
ATTACHMENT A – COMMENT SUMMARY AND RESPONSE**

		Information regarding financial data that can be released will be posted on the project website when it is available.
73	Get per car revenue from Transurban -- not upfront cash! Fix the 75 year windfall they are getting before extending it. NO MORE PRIVATE PARTNERS.	Comment noted.
<b>Process &amp; Public Involvement</b>		
74	How many people attended the public information meeting on June 11, 2018?	Approximately 76 people attended the public information meeting on June 11, 2018. 48 people signed the attendance sheet.
75	What information was presented during the May 20, 2019 public information meeting? Is it available online?	The purpose of the May 20, 2019 public information meeting was to provide an update on the preliminary findings of the EA, including existing conditions and the traffic analysis, and present the preliminary design. The study team also provided updates on the study schedule and project delivery. The information and materials presented are available on the website at <a href="http://www.495northernextension.org/public_meetings/may_20_2019_project_information_meeting.asp">http://www.495northernextension.org/public_meetings/may_20_2019_project_information_meeting.asp</a> .
76	To what extent does the public have a say in making a decision regarding the project? To what extent will VDOT consider the comments, questions and dissatisfaction of local residents during the planning, design, etc.	<p>VDOT's public involvement process for this study has included two public information meetings and meetings with community groups and elected officials. Additional community meetings and elected official briefings will be held leading up to the Location Public Hearing in late 2019/early 2020.</p> <p>Questions and feedback are welcomed to help the project team identify concerns, issues, and features of interest to direct impact communities, surrounding neighborhoods, road users, and from across the region as part of the Environmental Assessment study and development of the preliminary engineering design.</p>
77	Will an independent decision regarding the 495 NEXT Project be made without input from VDOT and Transurban?	VDOT is preparing an Environmental Assessment and associated technical reports on behalf of the Federal Highway Administration (FHWA). These documents are prepared pursuant to federal guidelines and the implementing regulations of the National Environmental Policy Act (NEPA). FHWA determines the appropriate level of environmental documentation and makes independent

**495 EXPRESS LANES NORTHERN EXTENSION STUDY  
MAY 2019 PUBLIC INFORMATION MEETING  
ATTACHMENT A – COMMENT SUMMARY AND RESPONSE**

		findings with respect to impacts. If the environmental document is approved by FHWA, Transurban will have the opportunity to submit a binding proposal to complete the project, which VDOT will be able to accept or reject. A proposal will ultimately require review and approval by the Commonwealth Transportation Board.
78	It seems like this project is a done deal. How much time will elapse and how many public meetings and hearings will be held between the time the studies are published and a contract is signed?	VDOT anticipates holding a location public hearing in late 2019 or early 2020. A final decision on the environmental document by the Federal Highway Administration is needed before VDOT can enter into a contract. Transurban would then have opportunity to submit a binding proposal to VDOT for its consideration. The earliest a contract could be signed with Transurban would be sometime in 2020.
79	How and when will the public be notified of future meetings or hearings? Will another public information meeting be held before the public hearing planned for fall 2019?	<p>Future meetings will be announced by email updates that can be subscribed to at <a href="http://www.495NorthernExtension.org">www.495NorthernExtension.org</a>. Additional outreach for the location public hearing will include newspaper advertising, direct mail to homes within a quarter-mile of the project study area, notices at libraries, VDOT social media, news media, and through local government and elected officials.</p> <p>Additionally, VDOT representatives will work with civic, business, and other organizations to identify opportunities to provide project information to the community. A series of neighborhood-level meetings are planned for fall 2019. The public hearing is planned for late 2019 or early 2020.</p>
80	<p>Request that the project be suspended and the citizen dialog be extended so that the citizens of the community can have full and complete transparency in evaluating the project and that other, more environmentally sound and forward-thinking solutions can be considered.</p> <p>Request that the Attorney General, Secretary of Transportation and Governor review VDOT's 495 Northbound Shoulder Lane Use project and 495 Express Lanes Northern Extension study due to</p>	Comments noted.



**495 EXPRESS LANES NORTHERN EXTENSION STUDY  
MAY 2019 PUBLIC INFORMATION MEETING  
ATTACHMENT A – COMMENT SUMMARY AND RESPONSE**

	concerns regarding lack of public process, public transparency, and public input.	
81	If phased express lanes do not show immediate congestion relief for the area, can they be removed from the TPB and CLRP? Can they be reviewed and reconsidered for another vote? Having passed by only one vote, shouldn't express lanes be seriously reconsidered and studied independently?	The traffic analysis for I-495 NEXT is ongoing. If analysis were to show significant degradation as a result of implementation of the project, VDOT would consider whether the project should be removed from the CLRP.
82	Provide adequate time (at least six weeks) and notice before any Fall Public Hearing of all matters that you propose to present at such Hearing, including final plans and NEPA Environment Assessment. Another Public Information meeting also seems reasonable. We and our neighbors did not receive adequate notice of the June 11, 2018 "Public Information Meeting #1" that your team pointed to at the May 20, 2019 meeting (that they presumptively labeled as "Meeting #2").	The June 2018 Public Information Meeting was promoted through newspaper advertising, direct mail to homes within a quarter-mile of the project study area, notices at libraries, VDOT social media, news media, and through local government and elected officials. Similar outreach is planned ahead of the future Location Public Hearing, with initial public notice provided at least 30 days ahead of the meeting.
83	More community meetings than mentioned are needed.	The study team is available to meet with homeowners associations, civic associations, and other community groups to present and discuss the study.
84	Please provide a venue where the public can view prior comments and responses.	Comments and responses are posted on the project website.
85	Numerous conflicts of interest concerns exist. There have been no thorough, independent or transparent reviews of environmental, noise and traffic studies (assessments or models).	VDOT adheres to the requirements of NEPA and other statutes. Established VDOT protocols and methods are used to conduct the EA and develop technical reports. These documents will be available to the public for review and comment before and after the Location Public Hearing. These documents are submitted to FHWA for review and approval.
86	Request for an independent review of VDOT's practices, management and decision making as it pertains to public notice, transparency and input.	VDOT's public involvement policy is in accordance with federal regulations, state laws, and VDOT policies, and was most recently updated in February 2019. The VDOT Public Involvement Manual is available at <a href="http://www.virginiadot.org/business/resources/locdes/Public_Involvement_Manual.pdf">http://www.virginiadot.org/business/resources/locdes/Public_Involvement_Manual.pdf</a> .
<b>Schedule</b>		

**495 EXPRESS LANES NORTHERN EXTENSION STUDY  
MAY 2019 PUBLIC INFORMATION MEETING  
ATTACHMENT A – COMMENT SUMMARY AND RESPONSE**

87	What is the current schedule? When will the extension of the express lanes be open to traffic?	<p>The anticipated schedule is subject to change as more information is available and is as follows:</p> <ul style="list-style-type: none"> <li>• Environmental Assessment Available for Public Comment – 15 days before Location Public Hearing</li> <li>• Location Public Hearing with 30-day Comment Period after Public Hearing – Late 2019/Early 2020</li> <li>• NEPA Decision from Federal Highway Administration – Early 2020</li> <li>• Detailed Design Phase – 2020</li> <li>• Potential Start of Construction – Late 2020</li> <li>• Express Lanes Open to Traffic – 2023</li> </ul>
<b>Other (Including Comments Outside the Scope of the 495 NEXT Study)</b>		
88	Does the study take future technological advancements into account?	Yes, the study is taking future technological advancements into consideration. Elements of the project infrastructure will be designed using new systems that help improve traffic operations and safety.
89	The 495 Northbound Shoulder Lane Use project has been removed from the website.	Previous studies have now been added to <a href="http://www.495NorthernExtension.org">www.495NorthernExtension.org</a> .
90	Is the original intent of Bill 662 being honored by VDOT? Delegate Murphy and Senator Favola appear to recall that Bill 662 was for a comprehensive Environmental Impact Study, to coordinate with Maryland’s plans and a new bridge, not a limited “assessment” study.	<p>Virginia HB 662 was enacted in 2018 and relates to the American Legion Bridge. It is distinct from this current study. Here is the enacted language.</p> <p><i>1. § 1. The Department of Transportation (Department) shall begin the initial design and related assessments for remediating the American Legion Bridge at the earliest time possible once necessary decisions have been made by the state of Maryland. The Department shall consult with the Commonwealth Transportation Board, the Department of Rail and Public Transportation, and the Northern Virginia Transportation Authority.</i></p> <p><i>The Department shall submit to the Governor and the General Assembly an executive summary and a report of its design and assessments for publication as a House or Senate document when available.</i></p> <p>The American Legion Bridge is jointly owned by Maryland and Virginia. Maryland’s I-495/270 study is an EIS and includes the</p>

**495 EXPRESS LANES NORTHERN EXTENSION STUDY  
MAY 2019 PUBLIC INFORMATION MEETING  
ATTACHMENT A – COMMENT SUMMARY AND RESPONSE**

		American Legion Bridge.
91	Concerns regarding the Shoulder Lane Use Project. An environmental study and air quality testing were not performed. Public project design meetings never occurred. The public was unable to review project studies and data. This lane also increased travel time on I-495, accidents and congestion before the bridge...all indicated in traffic studies by VDOT. Shoulder lane increased choke point congestion before the American Legion Bridge, using \$20 million taxpayer money. Now, VDOT wants this lane as part of their phased additional express lanes project...to help "relieve" congestion at same chokepoint that VDOT Created! Not logical. So wrong! This shoulder lane extension should be stopped ASAP to ease the merge mess before the bridge.	<p>The existing shoulder lane currently provides congestion relief for the northbound Beltway by providing additional merge area for the I-495 northbound Express Lanes. VDOT conducted an assessment of a potential removal of the shoulder lane. The study, conducted by the consulting firm JMT, found that with the removal of the shoulder lane there would be minimal change in the throughput of the mainline segment between Old Dominion Drive and the American Legion Bridge. The study also found that operations on the I-495 Express Lanes would deteriorate. The memo summarizing the results of the study can be found at <a href="http://www.virginiadot.org/projects/resources/NorthernVirginia/Handouts%20for%205-9-18%20McLean%20Meeting.pdf">http://www.virginiadot.org/projects/resources/NorthernVirginia/Handouts for 5-9-18 McLean Meeting.pdf</a>. VDOT conducted a separate assessment of the condition without the shoulder lane with a different consultant and the study team reached the same conclusions as those of the JMT study.</p> <p>The I-495 Express Lanes Extension project will provide physical separation between the Express Lanes and the general purpose lanes in the area encompassing the shoulder lane. This will help address the issue of traffic having to weave from the shoulder lane to the general purpose lanes between the current terminus of the Express Lanes and the terminus of the shoulder lane. This will help improve safety and traffic operations.</p>
92	The Saigon Citizens Association asks that VDOT not use the Saigon neighborhood as a storage area for their road building equipment.	Comment noted. VDOT works with contractors to minimize impact on adjacent communities to the extent possible.
93	Like the fact that it will ease traffic. I also like the urgency of the plan.	Comment noted.
94	The solution is to add another crossing. Has VDOT considered another bridge crossing further west, specifically on Seneca Road?	Additional crossings of the Potomac River have been studied throughout the years. The 495 Express Lanes Northern Extension would not preclude construction of another crossing of the Potomac River. Other jurisdictions in the region are studying additional



**495 EXPRESS LANES NORTHERN EXTENSION STUDY  
MAY 2019 PUBLIC INFORMATION MEETING  
ATTACHMENT A – COMMENT SUMMARY AND RESPONSE**

		crossings.
95	Maryland, the District of Columbia and the National Park Service (NPS) should widen the Clara Barton Parkway to create a through road from Maryland down the river into D.C., similar to the George Washington Memorial Parkway (GWMP).	This comment is outside the scope of this study.
96	Focus here and now on today's issues like back up around the Route 7 and 123 interchanges.	Areas outside of these study limits are under separate review and evaluation for future projects.
97	Can a flashing light be installed at the top of the hill before the Georgetown Pike/Douglass Drive intersection to warn drivers that cars may be stopped or turning ahead (similar to the Georgetown Pike/Swinks Mill Road intersection)? Reducing the speed limit and placing an officer there every once in a while, to give out tickets to speeders, WILL slow traffic down.	VDOT has initiated the design of a flashing beacon and supplemental signage in an effort to improve safety at this location. The project will be completed in fall 2019.
98	In the strongest possible terms, I urge you to look at the Georgetown Pike (outside the Beltway) traffic issues. There has been a recent influx of attention and tourism at Scott's Run which has created a major safety issue. People are parking their cars on Georgetown Pike because the small parking areas are full and are then walking along the side of the road, wearing bathing suits, carrying picnic baskets, with children and pets. It is a safety disaster waiting to happen. I urge additional police presence at the intersection of Swinks Mill and Georgetown Pike. I urge that Georgetown Pike be quickly made a no parking zone and that signs be erected to that fact. I urge that cars that parked on Georgetown Pike should receive a maximum fine parking ticket, and people found walking in the road should be stopped by the police. I am deeply concerned that a young child will be injured, if not killed in the chaos that has resulted from increased traffic, tourism and marketing of the Scott's Run park area.	VDOT is aware of these activities and is working with Fairfax County Officials, Fairfax County DOT, the Fairfax County Police Department and the National Park Service to address this situation.

**495 EXPRESS LANES NORTHERN EXTENSION STUDY  
MAY 20, 2019 PUBLIC INFORMATION MEETING  
COMMENT SUMMARY REPORT – FULL COMMENTS  
ATTACHMENT B**

ID #	Comment Date	Individual/Entity	Source of Request	Comment/Question
190618.04	6/18/2019	Individual	Email	Please pause and find real solutions. No additional lanes until Maryland widens the bridge. No use of public park lands. Please complete environmental impact studies.
190618.03	6/18/2019	Individual	Email	<p>Thank you for the opportunity to provide comments to your 495 Express Lanes study. My husband and I wholeheartedly support the initiative to create a paved bike path along the sound wall outside the beltway. We are long time residents of the Saigon Road subdivision and like many of the Saigon residents, we walk the streets of our neighborhood on a regular basis. And like many of our neighbors we would welcome a paved bike/walking trail and the opportunity to further our walking options, especially if we could walk someplace other than on our neighborhood streets. With the popularity of the Scotts Run County park near our neighborhood causing a parking problem on Georgetown Pike, this paved bike path would provide Saigon residents with an easy way to get to the park from within our neighborhood, as well as could provide access to the park for other Mclean residents from the adjacent areas. This will result in fewer vehicles that need to park at the limited parking spaces available at the park, and residents could walk to the park rather than being forced to drive there even though we are so close to the park at Scotts Run but lack any reasonable and safe way to get there except by vehicle.</p> <p>Thank you again for asking for our comments — Yes we want a paved bike path — Please.</p>
190618.02	6/18/2019	Individual	Email	<p>I agree completely with extending the HOV lanes all the way to the bridge. By having the end of HOV located before the exit to Georgetown Pike and GW Parkway, you create a dangerous and delaying crossover.</p> <p>Also the current configuration creates multiple pinch points when the lanes are open allowing folks to dive into the open lane only to have to merge back a few yards ahead.</p> <p>Thank you for the consideration.</p>

190618.01	6/18/2019	Individual	Email	<p>In reference to the I-495 Express Lanes Northern Extension Study, I would like to provide the following comments:</p> <p>Please register my OBJECTION to the proposed expansion to 495 (495 Hot Lanes, 495 NEXT, I-495 Express Lanes Northern Extension Study).</p> <p>No to building before Maryland widens the bridge</p> <p>No to phasing</p> <p>No to taking public parks and historic lands</p> <p>Please register the following concerns/flaws with the existing plan:</p> <p>Maryland has just voted to begin work on 270, postponing any work on MD 495 and the American Legion until some time in the undetermined future.</p> <p>2 additional HOT LANES will funnel into the same American Legion Bridge; 2 additional lanes into the same bottleneck does not solve the Virginia traffic jams, it adds to it.</p> <p>This moves the problem; it doesn't solve the problem.</p> <p>The solution is for the bridge to be widened, another crossing be added, or mass transportation to be added.</p> <p>Proposed Flyover Ramps and tolls will connect the HOT LANES to the George Washington Parkway. Parts of 3 parks, our historic byway and the rare and pristine Scott's Run will be taken.</p> <p>No Environmental Impact Study has been undertaken.</p> <p>Numerous conflict of interest concerns exist. There have been no thorough, independent, or transparent, reviews of environmental, noise, and traffic studies (assessments or models).</p> <p>Our public land and infrastructure will be given to a private company in exchange for citizens paying tolls on HOT Lanes.</p> <p>No general purpose lanes will be added, and HOT Lanes are unaffordable to the average commuter on a daily basis.</p> <p>I insist that you take pause, work with MDOT and FWHA and find a better solution that safeguards our future.</p>
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190617.03	6/17/2019	Individual	Email	<p>We applaud several aspects of the project. It is good that a trail is being built from Old Dominion north beyond the GW Parkway, to a point where it can access the American Legion Bridge and C&amp;O Towpath if/when Maryland widens its part of I-495. It is a huge benefit to trail users that they will be on the QUIET side of the sound wall, where there is significant wooded land and relatively clean air. We are pleased to see pedestrian/bike facilities on all three new bridges across I-495, at Live Oak Drive, Georgetown Pike and Old Dominion. Put Trail Along SOUTH Side of Old Dominion Dr.: We believe the new trail alongside Old Dominion should be on the SOUTH, not the NORTH side (See Figures 1 and 2). Figure 1 shows the north side trail in purple (as proposed by VDOT), and our proposed south side trail in blue, from Old Gate to Mottrom. The homes that can access the north-side trail are shown as purple "house icons" in Figure 1: there are only 14, six on the west side and eight on the east. However, if the trail follows our south side blue line, about 60 homes can be reached west of I-495, and about 40 more east of I-495, for a total of about 100 homes (blue "house" icons, Figure 1). There are about a hundred additional homes that can be reached in less than 2/3 mile (light blue "house" icons). On the north side, in contrast, no additional homes can be reached at any distance. Figure 2 shows (in blue) neighborhoods are within one mile of the southern route, including parts of McLean Hamlet, neighborhoods off Bridle Path, Foxhound, Hooking Road, Evans Mill Road, Windy Hill Road and more. The Langley School and the McLean Governmental Center are just a little over a mile. People from all these areas will be tempted to walk/bike across Old Dominion Drive if the trail is on the north side. A south side trail, in contrast, will take hikers and bikers safely under Old Dominion along the beltway. Other South-Side Advantages: There is VDOT right-of-way along Old Dominion all the way to Timberly Park (FCPA, green on Figure 1) to reach Old Gate Drive, the natural terminus of this trail west of I-495. The existing pavement of Old Dominion Drive can serve as part of the trail, once it is no longer used as a road. Finally, the trail underpass of Old Dominion (blue line on Figure 1) at the beltway can serve as a safe and scenic route for the Potomac Heritage National Scenic Trail from Scotts Run Nature Preserve to Timberly Park and on to Bullneck Run Stream Valley Park and Spring Hill Recreation Center. Extend trail from Old Dominion to Lewinsville: We also encourage you to extend the sound wall trail south from Old Dominion to Lewinsville Road as part of the project. This trail appears in the VDOT design, but only for 2045. It will create shorter hike/bike routes for many additional neighborhoods. We strongly support links from this segment into the neighborhoods (e.g. to Old Gate from the east) as shown in the VDOT map. TrailParallel495_1.jpg Figure 1. Homes that can reach trail on north (purple) or south (blue) side of Old Dominion TrailParallel495_2.jpg Figure 2 Neighborhoods</p>
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that can reach trail on north (purple) or south (blue) side of Old Dominion

190617.02	6/17/2019	Individual	Email	<p>Following are Comments submitted to VDOT for PHASED HOTLanes Deadline, June 18, 2019 :</p> <p>The following Comments were shared by Pat Lynch with his Langley Forest Neighbors. He asked me to forward to Officials and my list if I thought it might help.</p> <p>I am submitting His Comments to Officials and again to VDOT PHASED Comment Site for "Summary".</p> <p>I am also submitting the following email Comments to VDOT Comment Site and Officials for review and "Summary".</p> <p>I think Pat Lynch's Comments about VDOT Traffic Study that includes a "Phantom" New Bridge to MD are important to consider.</p> <p>A Faulty Study Premise Base will not provide Accurate Traffic Impact and Congestion Data for VDOT PHASED HOTLanes.... for 495 and VA Neighborhood Traffic.</p> <p>* What is Maryland's Start Date of New Bridge Construction ? VDOT DATA, Officials and Public need to know.</p> <p>* How long will this New Bridge take to Build ? VDOT DATA, Officials and Public need to know.</p> <p>* Has NPS ( National Park Service ) agreed to transfer to Maryland and VDOT Needed Parkland for Bridge Construction?</p> <p>* If not, when is Process for Act of Congress for VDOT to seize Parkland to begin ?</p> <p>Who will initiate Process ?</p> <p>How long will Process take ?</p> <p>Without this Vital Information and consideration of this information , VDOT's PHASED Schedule for 2020 Start Build and Data are meaningless.</p> <p>* Has NPS agreed to give give VDOT Historic Parklands to construct PHASED HOTLanes to before Current American Legion Bridge and for Flyover Ramp to G W Parkway ?</p> <p>The G W Parkway is NPS Land and Scotts Run is Fairfax County Park Authority.</p> <p>The right of way cannot be acquired from NPS and Fairfax Park Authority.</p> <p>* Has Potomac Historic Trails agreed to give VDOT Necessary Parkland to construct PHASED HOTLanes and new Live Oak Bridge ?</p> <p>VDOT 495 NEXT STAFF....Please do not submit illogically basedTraffic Studies based on A Nonexistent New American Legion Bridge to Public and Officials for PHASED Project Approval, until these Questions are Officially Answered.</p> <p>Residents want to Know PHASED Traffic Congestion Impacts to CHOKe POINT BEFORE Current American Legion Bridge.</p> <p>What are the PHASED Plan's Congestion Impacts to other Choke Points at I 267 Interchange,</p>
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			<p>the Ramps to and from Dulles Connector, Ramps to and from 123 during Rush Hours ?</p> <p>Residents want to know PHASED Project CONSTRUCTION IMPACTS for 495 and Neighborhood Traffic.</p> <p>Congestion Impacts for how many years of building construction ?</p> <p>When will PHASED Lanes begin ? How will PHASED Lanes alone Increase/decrease Congestion until 2045 ?</p> <p>Residents want to know PHASED Traffic Impacts to 495 and Neighborhood Traffic if Maryland does NOT Build New Bridge and HOTLanes. How will these Traffic Impacts be mitigated ?</p> <p>VDOT PHASED Traffic Congestion Studies should show General Improvement for All, not only HOTLane Drivers.</p> <p>VDOT PHASED Plan Studies should Prove Immediate Congestion Improvements for Everyone before it is allowed to go forward.</p> <p>Governor and Officials should Cancel the PHASED Section of the Contract Agreement with Transurban until VDOT shows and proves that it is a Good Agreement for VA Taxpayers and that PHASED HOTLanes will Improve Traffic Congestion.....without Maryland Plans and New Bridge in Place.</p>
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190617.01	6/17/2019	Individual	Email	<p>I submit all the following Comments &amp; Requests and following Email Content to VDOT COMMENT Section for Review, "Summary" and inclusion in VDOT Report for 495 NEXT...PHASED HOTLanes. I also ask for Officials to Review and Consider the Comments and Requests</p> <p>Abi Lerner, VDOT PHASED Project Head , wrote to me in following email , dated June 7th, that Comment Deadline was extended to June 18th. Officials on my email list were all copied by Abi Lerner. Abi also wrote that : "We need a few days to review the comments/questions that you included in your email. We will provide responses to you next week". Neither Abi Lerner or VDOT responded to the Residents' Request List , my comments or questions I submitted. There is still Silence. The Residents' List included many Issues relating to VDOT PHASED Project's Lack of Public Process, Public Transparency, and Public Input. It reflects other Comments, Concerns &amp; Requests submitted to me by Residents which follow VDOT &amp; TRANSURBAN CONTRACTS</p> <p>Residents request that the Original Contract and 2019 Contract with Transurban for HOTLanes, Express Lanes, 495 NEXT be placed Online at VDOT Site for Public Review....ASAP. Please ask VDOT to distribute Contracts to Officials for Review. Apparently, these Contracts, content and conditions are not readily available for Public Transparency and Review. Original Contract is important since 2019 Contract for PHASED HOTLanes continues timeline for Infrastructure Control by Transurban, does not extend it. What other Conditions and Agreements continue ? What are New Conditions and Agreements ?</p> <p>At May 14th MCA Transportation Committee Meeting, VDOT and Transurban Rep were asked Details of Contracts. We were told Details were not available to be shared. Details are Private. Are they Under Seal ? A request was asked of Governor's Office for Contract copy. Individual was told their office did not have a copy. Go to VDOT. Public &amp; Officials deserve to know every detail of Contracts that Control their State Infrastructure and Impact Traffic Conditions and their Lives. PUBLIC PRIVATE PARTNERSHIP ACT.....BEFORE AMENDMENT.....And After Amendment Please place Online for Public and Officials' Review ASAP</p> <p>2005 ENVIRONMENT LAW.....ORIGINAL STUDY Please place Online for Public and Officials' Review ASAP. TOLLING &amp; REVENUE BONDS CONTRACTS AND AGREEMENTS Please place Tolls and Revenue Bonds Agreements (Original and Current) with Transurban Online for Public &amp; Officials's Review ASAP. TOLLING GUARANTEES FOR TRAFFIC SPEED IN GENERAL LANES Will Transurban Guarantee General Lane Speed Limits of 40 mph, with HOTLanes at 60 mph....as MD proposes ? Will Transurban coordinate Tolls with MD Guarantees ? Will Transurban coordinate with MD "Speeds" &amp; Tolls to assure better &amp; consistent Congestion Relief in VA INDEPENDENT REVIEW OF VDOT STUDIES FOR NEPA AND FHA DECISIONS SHOULD VDOT-HIRED COMPANY REVIEW STUDY DATA ? COST BENEFIT STUDY FOR PHASED</p>
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HOTLANESVDOT Study should be conducted Independently and placed Online ASAP.BUILD FOR PROFIT STUDYIs PHASED HOTLanes being rushed for Transurban Profit and Not for Area Congestion Relief ?REMOVAL OF HOTLANES FROM TPB AND CLRP ?If PHASED HOTLanes do not show Congestion Relief Immediately for Area, can they be removed from TPB and CLRP....and be Reviewed and Reconsidered for Another VOTE ?Having passed by only one vote, shouldn't HOTLanes be seriously Reconsidered and Studied IndependentlyBILL 662.....BILL'S ORIGINAL INTENTIs Bill's Original Intent being Honored by VDOT ?Delegate Murphy and Senator Favola appear to recall that Bill 662 was for Comprehensive Environmental IMPACTStudy, to coordinate with MD's Plans and New Bridge.....NOT limited "Assessment" Study. They will check.Officials please share information.Who made this "Assessment" decision ? Why ? Is this Study Adequate ?VDOT is conducting Traffic Studies for 2045, assuming New MD Bridge and MD's HOTLanes are in Place on 495...A "Total" Comprehensive Traffic Congestion Area Package.However, VDOT decided to have limited "Assessment" Environmental Studies for their separate, independent PHASED HOTLanes .Why the Inconsistencies ? Conduct Limited Study to provide preferred results....Not Real AREA Environmental IMPACTS ?VDOT PHASED HOTLanes ( Especially with VDOT's declared New Bridge in Place and MD HOTLanes) will have Major Impacts to Parkland, Potomac, Streams, and Bridge !IMPACT Studies are Required !Maryland's Environment Document is not complete because IMPACT Studies are so complex in considering IMPACTS to Streams, Parkland, Potomac, etc.. New Proposed Bridge Impacts have delayed MD Study and MD Environment Document is incomplete.Why is VA allowed to rush a Piecemeal Project without Real IMPACT StudSHOULDER LANE EXTENSION TO BEFORE AMERICAN LEGION BRIDGEThis is another Piecemeal Project that avoided Environmental Air Testing by changing the Project's Name !Originally presented online as INCREASED CAPACITY Project, which it is with a New Lane Built ( denied by VDOT), the Project Name was changed to OPERATIONAL and SAFETY LANE.The Shoulder Lane Extension could then Avoid Environmental Air Testing...Avoid Small Particle Testing fo Public Safety !Promised Public Project Design Meetings never occurred....And Public was unable to Review Project , Studies and DATA !This Lane also increased Travel Time on 495, Accidents and Congestion before Bridge...All indicted in Traffic Studies by VDOT.All Studies were ignored by VDOT.Shoulder Lane Increased CHOKe POINT CONGESTION Before American Legion Bridge, using \$20 million Taxpayer Money.Now, VDOT wants this Lane as Part of their PHASED Additional HOTLanes Project ...to Help "Relieve" Congestion at Same CHOKe POINT....that VDOT Created ! Not Logical. So Wrong !This Shoulder Lane Extension to be STOPPED ASAP to ease Merge Mess Before Bridge .....Stop



			<p>VDOT-Created CHOKE POINT !Why does VDOT Refuse to Stop Shoulder Lane ?IS MARYLAND ADHERING TO NEPA BUT VA IS NOT ? WHY ?MITIGATION OF NEGATIVE ENVIRONMENTAL IMPACTS MITIGATING ENVIROMNETAL IMPACTS MAY BE PROHIBITIVELY EXPENSIVE, like Route 460 in Hampton Roads.Who will handle Impact Evaluations and Costs to Mitigate ?Should PHASED HOTLanes go forward before Total Environmental Impacts are Known and Evaluated ?Should PHASED HOTLanes go forward before Needed Parklands are Secured by VDOT &amp; MD ?RESIDENTS ASKED ATTORNEY GENERAL FOR REVIEW OF VDOT PHASED HOTLANES PROJECT &amp; SHOULDER LANE EXTENSION REGARDING LACK OF PUBLIC PROCESS, PUBLIC TRANSPARENCY, PUBLIC INPUT.Emails were sent to AG's Office email address as directed by Director of Constituents office.No Responses from AG Office received.I contacted Director of Constituents Office again. I was told Attorney General represents VDOT ....not Public Constituents.I was referred to our Governor and Secretary of Transportation for Help and Advice for Residents.RESIDENTS ASK GOVERNOR AND SECRETARY OF TRANSPORTATION FOR REVIEW OF VDOT PHASED HOTLANES &amp; SHOULDER LANE EXTENSION ON 495 NORTH BEFORE AMERICAN LEGION BRIDGE....REGARDING LACK OF PROPER PUBLIC PROCESS, PUBLIC TRANSPARENCY, PUBLIC INPUT.Thanks for Reading and Considering</p>
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190615.01	6/15/2019	Individual	Email	<p>Please accept these comments as the position of the McLean Citizens Association (MCA) Transportation Committee on VDOT's proposal to extend the Beltway Express Lanes from their present terminus to the foot of the American Legion Bridge. The American Legion Bridge is widely recognized as one of the most severe traffic bottlenecks in the transportation-clogged Washington Metro Area. The MCA has long been on record advocating that local and state governments in Virginia and Maryland work together with the Federal government to identify funding to increase the capacity of the Bridge. As such, the committee generally supports the efforts of the Virginia Department of Transportation (VDOT) to work with Transurban on the Capital Beltway Express Lanes Northern Extension (Project NEXT), which would add two express lanes in each direction on I-495 between the Dulles Toll Road and the Bridge and would make other improvements, including enhanced connections with the George Washington Memorial Parkway and the Dulles Toll Road. This would occur with limited governmental funding, as much of the costs would be borne by Transurban. The support of our committee is predicated on the assumption that adding these lanes would provide a benefit to those of us in northern Virginia, largely by reducing traffic congestion on the Beltway in Virginia and on neighborhood streets. This would most obviously be accomplished by connecting the proposed express lanes with similar lanes that Maryland would add to the American Legion Bridge and its adjacent section of the Beltway. At a May 14 meeting of our committee attended by Brent McKenzie of Transurban and Abi Lerner and Susan Shaw of VDOT, the VDOT personnel led us to understand that VDOT would likely proceed with Project NEXT regardless of Maryland's progress or actions because the project would still be expected to produce benefits in Virginia, notably through congestion relief in the residential neighborhoods, on the north side of McLean, currently adversely affected by "cut-through" traffic. Following recent action by its Board of Public Works, Maryland intends to concentrate first on adding lanes to I-270, delaying improvements to the American Legion Bridge site and its portion of the Beltway by roughly two years. In light of the possibility that VDOT could complete implementation of Project NEXT before Maryland has added corresponding lanes at the ALB and on the Beltway, our ultimate position on Project NEXT, and in particular on the timing of its implementation, will depend on a showing that the project will indeed have benefits in Virginia that are not dependent on Maryland having implemented its own measures. In that context, I would ask that you provide us with the data and analysis underlying VDOT's assessment that such independent benefits would occur as soon as that data and analysis become available. Please note that these comments represent the position of the Transportation Committee, not of the MCA itself. Thank you for your</p>
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				consideration of these comments, and please do not hesitate to contact me if there are any questions.
190613.02	6/13/2019	Individual	Email	I'm begging you to include bike paths along the beltway. There are hundreds and will be thousands of people that will use it everyday. I have an office in Bethesda and live in Oakton. I would bike most days to the office if only I had a safe path. If there was just something along the beltway, preferably on the outside of the sound barriers that would allow me and other to commute by bike. Others would join as their commute time would be predictable and very close if not faster than driving time during rush hour. Take a look at the W&OD bike trail. That has turned into a mini-highway for bikers to commute to and from the office. Bike Lanes along the beltway would be a huge improvement as many of us never want to take or cars let alone sit in them traffic when we know we can get to our destination via bike. As wide as you can make the lanes the better and allow access to the major rides to and from the bike lanes are what we need.



190613.01	6/13/2019	Individual	Email	<p>Dear VDOT:</p> <p>I am a resident of Live Oak Dr., right behind the Balls Hill Road/Georgetown Pike disaster intersection. I am writing to express concern about the planned expansion of hot lanes. The 495 entrance at that intersection, just before the American Legion Bridge, is my link to MD and DC, pretty much the link to all I do, including getting to work at Georgetown University, where my husband and I are professors. Like many of my neighbors, I am concerned that increasing traffic to the VA side of the bridge can only make that choke point, already calamitous, even worse. I know you have much to take into account besides we poor residents of this immediate pocket of congestion, and may need to do things that make things worse for us but better overall. By any measure, however, it seems unwise to move ahead with this planned expansion before Maryland agrees to widen the bridge and expand their side of the Beltway. Worsening this choke point, and the resultant gridlock at the Balls Hill/Gtown Pike intersection, will not only make our lives, already worsened by this traffic nightmare, even more miserable, but I fear it will endanger lives of those trapped in ambulances or otherwise needing to get from VA to MD for emergency reasons.</p> <p>I therefore join my concerned neighbors in pleading for VDOT to press pause on this plan.</p> <p>Respectfully, and with thanks for all you to do improve transportation for us,</p>
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190612.02	6/12/2019	Individual	Email	<p>Dear VDOT, Federal Highway Administration, and Elected Officials, Please register my OBJECTION to the proposed expansion to 495 (495 Hot Lanes, 495 NEXT, I-495 Express Lanes Northern Extension Study).</p> <p>Maryland has voted to postpone any work on MD 495 and the American Legion Bridge until some time in the undetermined future. During a May 14, 2019 meeting, VDOT stated that it was conducting a study to “show” that VDOT’s proposed 495 expansion is “independently viable.”</p> <p>McLean residents need a study to DETERMINE whether VDOT’S plan is “independently viable.” There is no use for a position paper by VDOT “to show” (rather than to question, study and determine) the efficacy of its plan.</p> <p>As proposed by VDOT, 2 additional HOT LANES will funnel into the same American Legion Bridge; 2 additional lanes into the same bottleneck cannot solve Virginia traffic jams.</p> <p>A true study would likely show only that traffic may flow faster to the choke point — the approach to the American Legion Bridge. It can’t possibly show that additional lanes solve or ease McLean residents’ traffic concerns. It cannot solve:</p> <ul style="list-style-type: none"> <li>(1) the choke point crisis nearing and at the bridge,</li> <li>(2) cars detouring into McLean from the McLean 495 exits, including 123 and Georgetown Pike, and</li> <li>(3) the snarled and dangerous traffic conditions on residential streets surrounding Georgetown Pike, as well as 123, as 495 traffic detours into our neighborhoods.</li> </ul> <p>It defies logic to conclude that additional lanes to a choke point will alleviate rather than aggravate McLean’s current traffic woes. Nor can additional lanes to a choke point move cars faster through a choke point.</p>
190612.01	6/12/2019	Individual	Email	<p>Just wanted to ask if you would be interested in getting external help with graphic design? We do all design work like banners, advertisements, photo edits, logos, flyers, etc. for a fixed monthly fee. We don't charge for each task. What kind of work do you need on a regular basis? Let me know and I'll share my portfolio with you.</p>

190610.31	6/10/2019	Individual	Email	<p>What features of the preliminary concept plans and options of the I-495 NEXT study do you like? I like that the approaches to the interchange will be widened and that there will be a dedicated through lane for eastbound traffic on Georgetown Pike over the Beltway. I like that there will not be an HOV-3 exit at our Georgetown Pike exit. The special new connection to GWParkway and the extra lanes. What features of the preliminary concept plans and options of the I-495 NEXT study do you have concerns about? Until Maryland widens the bridge and the beltway, I'm concerned we are just moving the bottleneck to the edge of the bridge. I hope there can truly be a dedicated lane for thru traffic. Residents who need to get to their kids' schools on the other (east) side of the Beltway get stuck with Maryland commuters who are trying to get to the front of the line to access 495. Do you have any additional comments or suggestions regarding the information provided at the May 20, 2019 Public Information Meeting? Add on and off ramps to the new bridge at Old Dominion to spread out the load on Georgetown Pike. The concepts of the "2045 Build / No Build" were weak and based on multiple potential assumptions Mr Lerner used in his presentation that confused the attendees. For example, part of the NO BUILD scenario includes the assumption that Maryland will expand the Legion Bridge and build its additional lanes. This is not a solid base for the NO BUILD option because those plans are still far from concrete. Additional comments, suggestions, or questions you have about the I-495 NEXT study. Redesign the intersection at Georgetown Pike, Balls Hill Road and the Beltway. Traffic flow from Georgetown Pike in both directions confronts and blocks traffic from Balls Hill road. A better pattern of lanes to join beltway traffic towards the river would smooth out and speed up flow. Now, even when traffic lights are green, these sources of cars block and delay traffic. Mornings for us residents in this area are chaotic and dangerous for our kids and families. While I hope that the VDOT and MDOT coordinate, ultimately as resident of Virginia I would like to see more aggressive advocacy from VDOT on our behalf. Put the politics aside and do what's right for VA residents in the area. We are taxpayers and voters and our voice matters.</p>
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190610.30	6/10/2019	Individual	Email	<p>What features of the preliminary concept plans and options of the I-495 NEXT study do you like?</p> <p>The special new connection to GWParkway. The extra lanes. I like that the approaches to the interchange will be widened and that there will be a dedicated through lane for eastbound traffic on Georgetown Pike over the Beltway. I like that there will not be an HOV-3 exit at our Georgetown Pike exit.</p> <p>What features of the preliminary concept plans and options of the I-495 NEXT study do you have concerns about?</p> <p>Until Maryland widens the bridge and the beltway, I'm concerned we are just moving the bottleneck to the edge of the bridge. I hope there can truly be a dedicated lane for thru traffic. Residents who need to get to their kids' schools on the other (east) side of the Beltway get stuck with Maryland commuters who are trying to get to the front of the line to access 495.</p> <p>Do you have any additional comments or suggestions regarding the information provided at the May 20, 2019 Public Information Meeting?</p> <p>Add on and off ramps to the new bridge at Old Dominion to spread out the load on Georgetown Pike. The concepts of the "2045 Build / No Build" were weak and based on multiple potential assumptions Mr Lerner used in his presentation that confused the attendees. For example, part of the NO BUILD scenario includes the assumption that Maryland will expand the Legion Bridge and build its additional lanes. This is not a solid base for the NO BUILD option because those plans are still far from concrete.</p> <p>Additional comments, suggestions, or questions you have about the I-495 NEXT study.</p> <p>The VDOT proposal to close off access to the Beltway during evening rush hours should be put in place on at least a trial basis. It should be relatively easy to put in place, and it would alleviate the problems for those who live outside the Beltway to access Langley HS, Cooper, Potomac School and other schools in McLean and Arlington during the afternoon. While I hope that the VDOT and MDOT coordinate, ultimately as resident of Virginia I would like to see more aggressive advocacy from VDOT on our behalf. Put the politics aside and do what's right for VA residents in the area. We are taxpayers and voters and our voice matters.</p>
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190610.29	6/10/2019	Individual	Email	<p>What features of the preliminary concept plans and options of the I-495 NEXT study do you like?The special new connection to GWParkway. The extra lanes. I like that the approaches to the interchange will be widened and that there will be a dedicated through lane for eastbound traffic on Georgetown Pike over the Beltway. I like that there will not be an HOV-3 exit at our Georgetown Pike exit.What features of the preliminary concept plans and options of the I-495 NEXT study do you have concerns about?Until Maryland widens the bridge and the beltway, I'm concerned we are just moving the bottleneck to the edge of the bridge. I hope there can truly be a dedicated lane for thru traffic. Residents who need to get to their kids' schools on the other (east) side of the Beltway get stuck with Maryland commuters who are trying to get to the front of the line to access 495.Do you have any additional comments or suggestions regarding the information provided at the May 20, 2019 Public Information Meeting? Add on and off ramps to the new bridge at Old Dominion to spread out the load on Georgetown Pike. The concepts of the "2045 Build / No Build" were weak and based on multiple potential assumptions Mr Lerner used in his presentation that confused the attendees. For example, part of the NO BUILD scenario includes the assumption that Maryland will expand the Legion Bridge and build its additional lanes. This is not a solid base for the NO BUILD option because those plans are still far from concrete.Additional comments, suggestions, or questions you have about the I-495 NEXT study. Redesign the intersection at Georgetown Pike, Balls Hill Road and the Beltway. Traffic flow from Georgetown Pike in both directions confronts and blocks traffic from Balls Hill road. A better pattern of lanes to join beltway traffic towards the river would smooth out and speed up flow. Now, even when traffic lights are green, these sources of cars block and delay traffic. Mornings for us residents in this area are chaotic and dangerous for our kids and families. While I hope that the VDOT and MDOT coordinate, ultimately as resident of Virginia I would like to see more aggressive advocacy from VDOT on our behalf. Put the politics aside and do what's right for VA residents in the area. We are taxpayers and voters and our voice matters.</p>
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190610.28	6/10/2019	Individual	Email	<p>What features of the preliminary concept plans and options of the I-495 NEXT study do you like?The special new connection to GWParkway. The extra lanes. I like that the approaches to the interchange will be widened and that there will be a dedicated through lane for eastbound traffic on Georgetown Pike over the Beltway. I like that there will not be an HOV-3 exit at our Georgetown Pike exit.What features of the preliminary concept plans and options of the I-495 NEXT study do you have concerns about?Until Maryland widens the bridge and the beltway, I'm concerned we are just moving the bottleneck to the edge of the bridge. I hope there can truly be a dedicated lane for thru traffic. Residents who need to get to their kids' schools on the other (east) side of the Beltway get stuck with Maryland commuters who are trying to get to the front of the line to access 495.Do you have any additional comments or suggestions regarding the information provided at the May 20, 2019 Public Information Meeting? Add on and off ramps to the new bridge at Old Dominion to spread out the load on Georgetown Pike. The concepts of the "2045 Build / No Build" were weak and based on multiple potential assumptions Mr Lerner used in his presentation that confused the attendees. For example, part of the NO BUILD scenario includes the assumption that Maryland will expand the Legion Bridge and build its additional lanes. This is not a solid base for the NO BUILD option because those plans are still far from concrete.Additional comments, suggestions, or questions you have about the I-495 NEXT study. Redesign the intersection at Georgetown Pike, Balls Hill Road and the Beltway. Traffic flow from Georgetown Pike in both directions confronts and blocks traffic from Balls Hill road. A better pattern of lanes to join beltway traffic towards the river would smooth out and speed up flow. Now, even when traffic lights are green, these sources of cars block and delay traffic. Mornings for us residents in this area are chaotic and dangerous for our kids and families. While I hope that the VDOT and MDOT coordinate, ultimately as resident of Virginia I would like to see more aggressive advocacy from VDOT on our behalf. Put the politics aside and do what's right for VA residents in the area. We are taxpayers and voters and our voice matters.</p>
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190610.27	6/10/2019	Individual	Email	<p>What features of the preliminary concept plans and options of the I-495 NEXT study do you like?The special new connection to GWParkway. The extra lanes. I like that the approaches to the interchange will be widened and that there will be a dedicated through lane for eastbound traffic on Georgetown Pike over the Beltway. I like that there will not be an HOV-3 exit at our Georgetown Pike exit.What features of the preliminary concept plans and options of the I-495 NEXT study do you have concerns about?Until Maryland widens the bridge and the beltway, I'm concerned we are just moving the bottleneck to the edge of the bridge. I hope there can truly be a dedicated lane for thru traffic. Residents who need to get to their kids' schools on the other (east) side of the Beltway get stuck with Maryland commuters who are trying to get to the front of the line to access 495.Do you have any additional comments or suggestions regarding the information provided at the May 20, 2019 Public Information Meeting? Add on and off ramps to the new bridge at Old Dominion to spread out the load on Georgetown Pike. The concepts of the "2045 Build / No Build" were weak and based on multiple potential assumptions Mr Lerner used in his presentation that confused the attendees. For example, part of the NO BUILD scenario includes the assumption that Maryland will expand the Legion Bridge and build its additional lanes. This is not a solid base for the NO BUILD option because those plans are still far from concrete.Additional comments, suggestions, or questions you have about the I-495 NEXT study. Redesign the intersection at Georgetown Pike, Balls Hill Road and the Beltway. Traffic flow from Georgetown Pike in both directions confronts and blocks traffic from Balls Hill road. A better pattern of lanes to join beltway traffic towards the river would smooth out and speed up flow. Now, even when traffic lights are green, these sources of cars block and delay traffic. Mornings for us residents in this area are chaotic and dangerous for our kids and families. While I hope that the VDOT and MDOT coordinate, ultimately as resident of Virginia I would like to see more aggressive advocacy from VDOT on our behalf. Put the politics aside and do what's right for VA residents in the area. We are taxpayers and voters and our voice matters.</p>
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190610.26	6/10/2019	Individual	Email	<p>What features of the preliminary concept plans and options of the I-495 NEXT study do you like?The special new connection to GWParkway. The extra lanes. I like that the approaches to the interchange will be widened and that there will be a dedicated through lane for eastbound traffic on Georgetown Pike over the Beltway. I like that there will not be an HOV-3 exit at our Georgetown Pike exit.What features of the preliminary concept plans and options of the I-495 NEXT study do you have concerns about?Until Maryland widens the bridge and the beltway, I'm concerned we are just moving the bottleneck to the edge of the bridge. I hope there can truly be a dedicated lane for thru traffic. Residents who need to get to their kids' schools on the other (east) side of the Beltway get stuck with Maryland commuters who are trying to get to the front of the line to access 495.Do you have any additional comments or suggestions regarding the information provided at the May 20, 2019 Public Information Meeting? Add on and off ramps to the new bridge at Old Dominion to spread out the load on Georgetown Pike. The concepts of the "2045 Build / No Build" were weak and based on multiple potential assumptions Mr Lerner used in his presentation that confused the attendees. For example, part of the NO BUILD scenario includes the assumption that Maryland will expand the Legion Bridge and build its additional lanes. This is not a solid base for the NO BUILD option because those plans are still far from concrete.Additional comments, suggestions, or questions you have about the I-495 NEXT study. Redesign the intersection at Georgetown Pike, Balls Hill Road and the Beltway. Traffic flow from Georgetown Pike in both directions confronts and blocks traffic from Balls Hill road. A better pattern of lanes to join beltway traffic towards the river would smooth out and speed up flow. Now, even when traffic lights are green, these sources of cars block and delay traffic. Mornings for us residents in this area are chaotic and dangerous for our kids and families. While I hope that the VDOT and MDOT coordinate, ultimately as resident of Virginia I would like to see more aggressive advocacy from VDOT on our behalf. Put the politics aside and do what's right for VA residents in the area. We are taxpayers and voters and our voice matters.</p>
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190610.25	6/10/2019	Individual	Email	<p>What features of the preliminary concept plans and options of the I-495 NEXT study do you like?</p> <p>I like that the approaches to the interchange will be widened and that there will be a dedicated through lane for eastbound traffic on Georgetown Pike over the Beltway. I like that there will not be an Express Lanes entrance or exit at Georgetown Pike.</p> <p>What features of the preliminary concept plans and options of the I-495 NEXT study do you have concerns about?</p> <p>As mentioned above, until Maryland widens the bridge and the beltway, I'm concerned we are just moving the bottleneck to the edge of the bridge.</p> <p>Do you have any additional comments or suggestions regarding the information provided at the May 20, 2019 Public Information Meeting?</p> <p>Add on and off ramps to the new bridge at Old Dominion to spread out the load on Georgetown Pike.</p> <p>Additional comments, suggestions, or questions you have about the I-495 NEXT study.</p> <p>The single most important item now is that VDOT needs to lobby MDoT aggressively to get MDoT to modify the decision last week to defer widening the American Legion Bridge until the second phase of its project. Widening the bridge is crucial to any traffic relief in this area and needs to once again be the priority matter in MDoT's project. Otherwise, VDOT's efforts in its current proposal will have only very limited benefits. Redesign the intersection at Georgetown Pike, Balls Hill Road and the Beltway. Traffic flow from Georgetown Pike in both directions confronts and blocks traffic from Balls Hill road. A better pattern of lanes to join beltway traffic towards the river would smooth out and speed up flow. Now, even when traffic lights are green, these sources of cars block and delay traffic. Mornings for us residents in this area are chaotic and dangerous for our kids and families. While I hope that the VDOT and MDoT coordinate, ultimately as resident of Virginia I would like to see more aggressive advocacy from VDOT on our behalf. Put the politics aside and do what's right for VA residents in the area. We are taxpayers and voters and our voice matters.</p>
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190610.24	6/10/2019	Individual	Email	<p>What features of the preliminary concept plans and options of the I-495 NEXT study do you like?The special new connection to GWParkway. The extra lanes. I like that the approaches to the interchange will be widened and that there will be a dedicated through lane for eastbound traffic on Georgetown Pike over the Beltway. I like that there will not be an HOV-3 exit at our Georgetown Pike exit.What features of the preliminary concept plans and options of the I-495 NEXT study do you have concerns about?Until Maryland widens the bridge and the beltway, I'm concerned we are just moving the bottleneck to the edge of the bridge. I hope there can truly be a dedicated lane for thru traffic. Residents who need to get to their kids' schools on the other (east) side of the Beltway get stuck with Maryland commuters who are trying to get to the front of the line to access 495.Do you have any additional comments or suggestions regarding the information provided at the May 20, 2019 Public Information Meeting? Add on and off ramps to the new bridge at Old Dominion to spread out the load on Georgetown Pike. The concepts of the "2045 Build / No Build" were weak and based on multiple potential assumptions Mr Lerner used in his presentation that confused the attendees. For example, part of the NO BUILD scenario includes the assumption that Maryland will expand the Legion Bridge and build its additional lanes. This is not a solid base for the NO BUILD option because those plans are still far from concrete.Additional comments, suggestions, or questions you have about the I-495 NEXT study. Redesign the intersection at Georgetown Pike, Balls Hill Road and the Beltway. Traffic flow from Georgetown Pike in both directions confronts and blocks traffic from Balls Hill road. A better pattern of lanes to join beltway traffic towards the river would smooth out and speed up flow. Now, even when traffic lights are green, these sources of cars block and delay traffic. Mornings for us residents in this area are chaotic and dangerous for our kids and families. While I hope that the VDOT and MDOT coordinate, ultimately as resident of Virginia I would like to see more aggressive advocacy from VDOT on our behalf. Put the politics aside and do what's right for VA residents in the area. We are taxpayers and voters and our voice matters.</p>
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190610.23	6/10/2019	Individual	Email	<p>What features of the preliminary concept plans and options of the I-495 NEXT study do you like?The special new connection to GWParkway. The extra lanes. I like that the approaches to the interchange will be widened and that there will be a dedicated through lane for eastbound traffic on Georgetown Pike over the Beltway. I like that there will not be an HOV-3 exit at our Georgetown Pike exit.What features of the preliminary concept plans and options of the I-495 NEXT study do you have concerns about?Until Maryland widens the bridge and the beltway, I'm concerned we are just moving the bottleneck to the edge of the bridge. I hope there can truly be a dedicated lane for thru traffic. Residents who need to get to their kids' schools on the other (east) side of the Beltway get stuck with Maryland commuters who are trying to get to the front of the line to access 495.Do you have any additional comments or suggestions regarding the information provided at the May 20, 2019 Public Information Meeting? Add on and off ramps to the new bridge at Old Dominion to spread out the load on Georgetown Pike. The concepts of the "2045 Build / No Build" were weak and based on multiple potential assumptions Mr Lerner used in his presentation that confused the attendees. For example, part of the NO BUILD scenario includes the assumption that Maryland will expand the Legion Bridge and build its additional lanes. This is not a solid base for the NO BUILD option because those plans are still far from concrete.Additional comments, suggestions, or questions you have about the I-495 NEXT study. Redesign the intersection at Georgetown Pike, Balls Hill Road and the Beltway. Traffic flow from Georgetown Pike in both directions confronts and blocks traffic from Balls Hill road. A better pattern of lanes to join beltway traffic towards the river would smooth out and speed up flow. Now, even when traffic lights are green, these sources of cars block and delay traffic. Mornings for us residents in this area are chaotic and dangerous for our kids and families. While I hope that the VDOT and MDOT coordinate, ultimately as resident of Virginia I would like to see more aggressive advocacy from VDOT on our behalf. Put the politics aside and do what's right for VA residents in the area. We are taxpayers and voters and our voice matters.</p>
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190610.22	6/10/2019	Individual	Email	<p>What features of the preliminary concept plans and options of the I-495 NEXT study do you like?The special new connection to GWParkway. The extra lanes. I like that the approaches to the interchange will be widened and that there will be a dedicated through lane for eastbound traffic on Georgetown Pike over the Beltway. I like that there will not be an HOV-3 exit at our Georgetown Pike exit.What features of the preliminary concept plans and options of the I-495 NEXT study do you have concerns about?Until Maryland widens the bridge and the beltway, I'm concerned we are just moving the bottleneck to the edge of the bridge. I hope there can truly be a dedicated lane for thru traffic. Residents who need to get to their kids' schools on the other (east) side of the Beltway get stuck with Maryland commuters who are trying to get to the front of the line to access 495.Do you have any additional comments or suggestions regarding the information provided at the May 20, 2019 Public Information Meeting? Add on and off ramps to the new bridge at Old Dominion to spread out the load on Georgetown Pike. The concepts of the "2045 Build / No Build" were weak and based on multiple potential assumptions Mr Lerner used in his presentation that confused the attendees. For example, part of the NO BUILD scenario includes the assumption that Maryland will expand the Legion Bridge and build its additional lanes. This is not a solid base for the NO BUILD option because those plans are still far from concrete.Additional comments, suggestions, or questions you have about the I-495 NEXT study. Redesign the intersection at Georgetown Pike, Balls Hill Road and the Beltway. Traffic flow from Georgetown Pike in both directions confronts and blocks traffic from Balls Hill road. A better pattern of lanes to join beltway traffic towards the river would smooth out and speed up flow. Now, even when traffic lights are green, these sources of cars block and delay traffic. Mornings for us residents in this area are chaotic and dangerous for our kids and families. While I hope that the VDOT and MDOT coordinate, ultimately as resident of Virginia I would like to see more aggressive advocacy from VDOT on our behalf. Put the politics aside and do what's right for VA residents in the area. We are taxpayers and voters and our voice matters.</p>
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190610.21	6/10/2019	Individual	Email	<p>What features of the preliminary concept plans and options of the I-495 NEXT study do you like?The special new connection to GWParkway. The extra lanes. I like that the approaches to the interchange will be widened and that there will be a dedicated through lane for eastbound traffic on Georgetown Pike over the Beltway. I like that there will not be an HOV-3 exit at our Georgetown Pike exit.What features of the preliminary concept plans and options of the I-495 NEXT study do you have concerns about?Until Maryland widens the bridge and the beltway, I'm concerned we are just moving the bottleneck to the edge of the bridge. I hope there can truly be a dedicated lane for thru traffic. Residents who need to get to their kids' schools on the other (east) side of the Beltway get stuck with Maryland commuters who are trying to get to the front of the line to access 495.Do you have any additional comments or suggestions regarding the information provided at the May 20, 2019 Public Information Meeting? Add on and off ramps to the new bridge at Old Dominion to spread out the load on Georgetown Pike. The concepts of the "2045 Build / No Build" were weak and based on multiple potential assumptions Mr Lerner used in his presentation that confused the attendees. For example, part of the NO BUILD scenario includes the assumption that Maryland will expand the Legion Bridge and build its additional lanes. This is not a solid base for the NO BUILD option because those plans are still far from concrete.Additional comments, suggestions, or questions you have about the I-495 NEXT study. Redesign the intersection at Georgetown Pike, Balls Hill Road and the Beltway. Traffic flow from Georgetown Pike in both directions confronts and blocks traffic from Balls Hill road. A better pattern of lanes to join beltway traffic towards the river would smooth out and speed up flow. Now, even when traffic lights are green, these sources of cars block and delay traffic. Mornings for us residents in this area are chaotic and dangerous for our kids and families. While I hope that the VDOT and MDOT coordinate, ultimately as resident of Virginia I would like to see more aggressive advocacy from VDOT on our behalf. Put the politics aside and do what's right for VA residents in the area. We are taxpayers and voters and our voice matters.</p>
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190610.20	6/10/2019	Individual	Email	<p>What features of the preliminary concept plans and options of the I-495 NEXT study do you like?</p> <p>What features of the preliminary concept plans and options of the I-495 NEXT study do you have concerns about?</p> <p>My family lives in the McLean Hamlet and our house backs up to the Dulles Toll Road. Over the years the noise from the increased traffic has increased tremendously. The sound barrier is too short. We request that as part of the plans and options that the noise barrier wall be significantly improved and increased in height.</p> <p>Do you have any additional comments or suggestions regarding the information provided at the May 20, 2019 Public Information Meeting?</p> <p>Additional comments, suggestions, or questions you have about the I-495 NEXT study.</p> <p>Significant improvements need to be made to safely link bike trails to the Tyson's area. As part of this I-495 NEXT study, there should be an increased focus on improved pedestrian and bicycle paths. For example, improvements should be made to Rt. 123 to link the bike path to Chain Bridge and the extensive trails on the MD and DC side of the Potomac River. Today it is unsafe to bike on Rt. 123 to the Chain Bridge.</p>
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190610.19	6/10/2019	Individual	Email	<p>What features of the preliminary concept plans and options of the I-495 NEXT study do you like?The special new connection to GWParkway. The extra lanes. I like that the approaches to the interchange will be widened and that there will be a dedicated through lane for eastbound traffic on Georgetown Pike over the Beltway. I like that there will not be an HOV-3 exit at our Georgetown Pike exit.What features of the preliminary concept plans and options of the I-495 NEXT study do you have concerns about?The special new connection to GWParkway. The extra lanes. I like that the approaches to the interchange will be widened and that there will be a dedicated through lane for eastbound traffic on Georgetown Pike over the Beltway. I like that there will not be an HOV-3 exit at our Georgetown Pike exit.Do you have any additional comments or suggestions regarding the information provided at the May 20, 2019 Public Information Meeting? Until Maryland widens the bridge and the beltway, I'm concerned we are just moving the bottleneck to the edge of the bridge. I hope there can truly be a dedicated lane for thru traffic. Residents who need to get to their kids' schools on the other (east) side of the Beltway get stuck with Maryland commuters who are trying to get to the front of the line to access 495.Additional comments, suggestions, or questions you have about the I-495 NEXT study. Redesign the intersection at Georgetown Pike, Balls Hill Road and the Beltway. Traffic flow from Georgetown Pike in both directions confronts and blocks traffic from Balls Hill road. A better pattern of lanes to join beltway traffic towards the river would smooth out and speed up flow. Now, even when traffic lights are green, these sources of cars block and delay traffic. Mornings for us residents in this area are chaotic and dangerous for our kids and families. While I hope that the VDOT and MDOT coordinate, ultimately as resident of Virginia I would like to see more aggressive advocacy from VDOT on our behalf. Put the politics aside and do what's right for VA residents in the area. We are taxpayers and voters and our voice matters.</p>
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190610.18	6/10/2019	Individual	Email	<p>What features of the preliminary concept plans and options of the I-495 NEXT study do you like?The special new connection to GWParkway. The extra lanes. I like that the approaches to the interchange will be widened and that there will be a dedicated through lane for eastbound traffic on Georgetown Pike over the Beltway. I like that there will not be an HOV-3 exit at our Georgetown Pike exit.What features of the preliminary concept plans and options of the I-495 NEXT study do you have concerns about?Until Maryland widens the bridge and the beltway, I'm concerned we are just moving the bottleneck to the edge of the bridge. I hope there can truly be a dedicated lane for thru traffic. Residents who need to get to their kids' schools on the other (east) side of the Beltway get stuck with Maryland commuters who are trying to get to the front of the line to access 495.Do you have any additional comments or suggestions regarding the information provided at the May 20, 2019 Public Information Meeting? Add on and off ramps to the new bridge at Old Dominion to spread out the load on Georgetown Pike. The concepts of the "2045 Build / No Build" were weak and based on multiple potential assumptions Mr Lerner used in his presentation that confused the attendees. For example, part of the NO BUILD scenario includes the assumption that Maryland will expand the Legion Bridge and build its additional lanes. This is not a solid base for the NO BUILD option because those plans are still far from concrete.Additional comments, suggestions, or questions you have about the I-495 NEXT study. Redesign the intersection at Georgetown Pike, Balls Hill Road and the Beltway. Traffic flow from Georgetown Pike in both directions confronts and blocks traffic from Balls Hill road. A better pattern of lanes to join beltway traffic towards the river would smooth out and speed up flow. Now, even when traffic lights are green, these sources of cars block and delay traffic. Mornings for us residents in this area are chaotic and dangerous for our kids and families. While I hope that the VDOT and MDOT coordinate, ultimately as resident of Virginia I would like to see more aggressive advocacy from VDOT on our behalf. Put the politics aside and do what's right for VA residents in the area. We are taxpayers and voters and our voice matters.</p>
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190610.17	6/10/2019	Individual	Email	<p>What features of the preliminary concept plans and options of the I-495 NEXT study do you like?The special new connection to GWParkway. The extra lanes. I like that the approaches to the interchange will be widened and that there will be a dedicated through lane for eastbound traffic on Georgetown Pike over the Beltway. I like that there will not be an HOV-3 exit at our Georgetown Pike exit.What features of the preliminary concept plans and options of the I-495 NEXT study do you have concerns about?Until Maryland widens the bridge and the beltway, I'm concerned we are just moving the bottleneck to the edge of the bridge. I hope there can truly be a dedicated lane for thru traffic. Residents who need to get to their kids' schools on the other (east) side of the Beltway get stuck with Maryland commuters who are trying to get to the front of the line to access 495.Do you have any additional comments or suggestions regarding the information provided at the May 20, 2019 Public Information Meeting? Add on and off ramps to the new bridge at Old Dominion to spread out the load on Georgetown Pike. The concepts of the "2045 Build / No Build" were weak and based on multiple potential assumptions Mr Lerner used in his presentation that confused the attendees. For example, part of the NO BUILD scenario includes the assumption that Maryland will expand the Legion Bridge and build its additional lanes. This is not a solid base for the NO BUILD option because those plans are still far from concrete.Additional comments, suggestions, or questions you have about the I-495 NEXT study. Redesign the intersection at Georgetown Pike, Balls Hill Road and the Beltway. Traffic flow from Georgetown Pike in both directions confronts and blocks traffic from Balls Hill road. A better pattern of lanes to join beltway traffic towards the river would smooth out and speed up flow. Now, even when traffic lights are green, these sources of cars block and delay traffic. Mornings for us residents in this area are chaotic and dangerous for our kids and families. While I hope that the VDOT and MDOT coordinate, ultimately as resident of Virginia I would like to see more aggressive advocacy from VDOT on our behalf. Put the politics aside and do what's right for VA residents in the area. We are taxpayers and voters and our voice matters.</p>
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190610.16	6/10/2019	Individual	Email	<p>As a long time resident of Mclean and local small business owner, I agree with Debra this expansion is wrong especially since the bridge is the problem until it is widened it just doesn't make sense and the lack of an environmental impact study is irresponsible! Dear VDOT, Federal Highway Administration, and Elected Officials, Please register my OBJECTION to the proposed expansion to 495 (495 Hot Lanes, 495 NEXT, I-495 Express Lanes Northern Extension Study). No to building before Maryland widens the bridge No to phasing No to taking public parks and historic lands Please register the following concerns/flaws with the existing plan: Maryland has just voted to begin work on 270, postponing any work on MD 495 and the American Legion until some time in the undetermined future. 2 additional HOT LANES will funnel into the same American Legion Bridge; 2 additional lanes into the same bottleneck does not solve the Virginia traffic jams, it adds to it. This moves the problem; it doesn't solve the problem. The solution is for the bridge to be widened, another crossing be added, or mass transportation to be added. Proposed Flyover Ramps and tolls will connect the HOT LANES to the George Washington Parkway. Parts of 3 parks, our historic byway and the rare and pristine Scott's Run will be taken. No Environmental Impact Study has been undertaken. Numerous conflict of interest concerns exist. There have been no thorough, independent, or transparent, reviews of environmental, noise, and traffic studies (assessments or models). Our public land and infrastructure will be given to a private company in exchange for citizens paying tolls on HOT Lanes. No general purpose lanes will be added, and HOT Lanes are unaffordable to the average commuter on a daily basis. I implore you to take pause, work with MDOT and FWHA and find a better solution that safeguards our future.</p>
190610.15	6/10/2019	Legal Counsel	Email	<p>Good afternoon,  Attached please find a comment letter from the Southern Environmental Law Center on the I-495 Express Lanes Northern Extension Study. We have also provided a copy of a comment letter dated July 11, 2018 that we submitted on this project.  Please do not hesitate to contact me if you have any questions or would like to discuss any of our comments further.</p>



190610.14	6/10/2019	Individual	Email	<p>What features of the preliminary concept plans and options of the I-495 NEXT study do you like?</p> <p>There is a need for a higher and more sound absorbing wall along I-495 from Lewinsville to Balls Hill. Houses in this area are not selling and home owners are disturbed by the 14 lanes of car traffic on 495.</p> <p>What features of the preliminary concept plans and options of the I-495 NEXT study do you have concerns about?</p> <p>There is a need for a higher and more sound absorbing wall along I-495 from Lewinsville to Balls Hill. Houses in this area are not selling and home owners are disturbed by the 14 lanes of car traffic on 495.</p> <p>Do you have any additional comments or suggestions regarding the information provided at the May 20, 2019 Public Information Meeting?</p> <p>There is a need for a higher and more sound absorbing wall along I-495 from Lewinsville to Balls Hill. Houses in this area are not selling and home owners are disturbed by the 14 lanes of car traffic on 495.</p> <p>Additional comments, suggestions, or questions you have about the I-495 NEXT study.</p> <p>There is a need for a higher and more sound absorbing wall along I-495 from Lewinsville to Balls Hill. Houses in this area are not selling and home owners are disturbed by the 14 lanes of car traffic on 495.</p>
190610.13	6/10/2019	Individual	Email	<p>Hello, Question: Will this project simply take existing general purpose lanes and repurpose them for express lanes, or, will the project actually build new lanes and add lanes to the highway? In other words, will the project increase the number of lanes available between the Toll road and the GW parkway as opposed to renaming the lanes?</p>
190610.12	6/10/2019	Individual	Email	<p>COMMENT</p> <p>Concerning Northern Virginia traffic ... - I'm now retired and no longer have to travel during rush hour. That said, the American Legion bridge seems to back up during what seems would be "light traffic" times of day. - I do not know how we can address traffic issues with discussing a SECOND BRIDGE CROSSING!*. Approximately a year ago I needed to attend a meeting at 7pm at Reagan National Airport. I left Great Falls, VA at 5:30pm (thinking that I was driving into DC during the evening rush hour (how bad could traffic be?). I wasn't close to getting there on time? Thanks for trying to give us some relief.</p>

190610.11	6/10/2019	Individual	Email	<p>I agree with all the points addressed below. Until there is work on the American Legion bridge or another way to cross the Potomac River all the hot lanes do is funnel more traffic to the choke point.</p> <p>Please do not pursue this course of action. Dear VDOT, Federal Highway Administration, and Elected Officials,</p> <p>Please register my OBJECTION to the proposed expansion to 495 (495 Hot Lanes, 495 NEXT, I-495 Express Lanes Northern Extension Study).</p> <p>No to building before Maryland widens the bridge</p> <p>No to phasing</p> <p>No to taking public parks and historic lands</p> <p>Please register the following concerns/flaws with the existing plan:</p> <p>Maryland has just voted to begin work on 270, postponing any work on MD 495 and the American Legion until some time in the undetermined future.</p> <p>2 additional HOT LANES will funnel into the same American Legion Bridge; 2 additional lanes into the same bottleneck does not solve the Virginia traffic jams, it adds to it.</p> <p>This moves the problem; it doesn't solve the problem.</p> <p>The solution is for the bridge to be widened, another crossing be added, or mass transportation to be added.</p> <p>Proposed Flyover Ramps and tolls will connect the HOT LANES to the George Washington Parkway. Parts of 3 parks, our historic byway and the rare and pristine Scott's Run will be taken.</p> <p>No Environmental Impact Study has been undertaken.</p> <p>Numerous conflict of interest concerns exist. There have been no thorough, independent, or transparent, reviews of environmental, noise, and traffic studies (assessments or models).</p> <p>Our public land and infrastructure will be given to a private company in exchange for citizens paying tolls on HOT Lanes.</p> <p>No general purpose lanes will be added, and HOT Lanes are unaffordable to the average commuter on a daily basis.</p> <p>I implore you to take pause, work with MDOT and FHWA and find a better solution that safeguards our future.</p>
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190610.10	6/10/2019	Individual	Email	<p>â?ol-495 Express Lanes Northern Extension Studyâ? Dear VDOT, Federal Highway Administration, and Elected Officials, Please register my OBJECTION to the proposed expansion to 495 (495 Hot Lanes, 495 NEXT, I-495 Express Lanes Northern Extension Study). No to building before Maryland widens the bridge No to fly over ramps connecting 495 to GWP No to taking public parks and historic lands Please register the following concerns/flaws with the existing plan: This project is premature and being rushed. With Maryland not proceeding at the same pace, it seems incomprehensible that the project proposed by Virginia will improve conditions if the Hot Lanes end at the American Legion Bridge. Two additional lanes into the same bottleneck does not solve the Virginia traffic jams, it adds to it. The community has serious concerns that there has not been full transparency in the planning of the project. We are in the process of filing several Freedom of Information Act requests to ensure that the public has complete information and an accurate record before making decisions about whether to oppose or support the project. Until we see the relevant records, we do not have confidence that proper environmental studies have been done to assess the full impact of the project on environmentally sensitive areas. Proposed Flyover Ramps and tolls will connect the HOT LANES to the George Washington Parkway. Parts of 3 parks, our historic byway and the rare and pristine Scottâ?Ts Run will be taken. A complete assessment of the need for sound walls in the area has yet to be undertaken or shared with the community. We believe sound walls are vital to minimizing possible sever impact on certain neighborhoods impacted by the project. No general purpose lanes will be added, and HOT Lanes are unaffordable to the average commuter on a daily basis. I respectfully request that the project be suspended and the citizen dialog be extended so that the citizens of the community can have full and complete transparency in evaluating the project and that other, more environmentally sound and forward-thinking solutions can be considered.</p>
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190610.09	6/10/2019	Individual	Email	<p>Dear VDOT:</p> <p>I am a resident of Live Oak Dr., right behind the Balls Hill Road/Georgetown Pike disaster intersection. I am writing to express concern about the planned expansion of hot lanes. The 495 entrance at that intersection, just before the American Legion Bridge, is my link to MD and DC, pretty much the link to all I do, including getting to work at Georgetown University, where my husband and I are professors. Like many of my neighbors, I am concerned that increasing traffic to the VA side of the bridge can only make that choke point, already calamitous, even worse. I know you have much to take into account besides we poor residents of this immediate pocket of congestion, and may need to do things that make things worse for us but better overall. By any measure, however, it seems unwise to move ahead with this planned expansion before Maryland agrees to widen the bridge and expand their side of the Beltway. Worsening this choke point, and the resultant gridlock at the Balls Hill/Gtown Pike intersection, will not only make our lives, already worsened by this traffic nightmare, even more miserable, but I fear it will endanger lives of those trapped in ambulances or otherwise needing to get from VA to MD for emergency reasons.</p> <p>I therefore join my concerned neighbors in pleading for VDOT to press pause on this plan.</p> <p>Respectfully, and with thanks for all you to do improve transportation for us,</p>
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190610.08	6/10/2019	Individual	Email	<p>Dear VDOT, Federal Highway Administration, and Elected Officials, Please register my OBJECTION to the proposed expansion to 495 (495 Hot Lanes, 495 NEXT, I-495 Express Lanes Northern Extension Study). No to building before Maryland widens the bridge No to phasing No to taking public parks and historic lands Please register the following concerns/flaws with the existing plan: Maryland has just voted to begin work on 270, postponing any work on MD 495 and the American Legion until some time in the undetermined future. 2 additional HOT LANES will funnel into the same American Legion Bridge; 2 additional lanes into the same bottleneck does not solve the Virginia traffic jams, it adds to it. This moves the problem; it doesn't solve the problem. What a waste of public and taxpayer funds. The solution is for the bridge to be widened, another crossing be added, or mass transportation to be added. We need more public transport. Proposed Flyover Ramps and tolls will connect the HOT LANES to the George Washington Parkway. Parts of 3 parks, our historic byway and the rare and pristine Scott's Run will be taken. This parkland is deeply special to me having grown up as a child loving the park and nature there throughout my life. No Environmental Impact Study has been undertaken. You've got to be kidding me. Do an environmental impact study. Numerous conflict of interest concerns exist. There have been no thorough, independent, or transparent reviews of environmental, noise, and traffic studies (assessments or models). Our public land and infrastructure will be given to a private company in exchange for citizens paying tolls on HOT Lanes. No general purpose lanes will be added, and HOT Lanes are unaffordable to the average commuter on a daily basis. This is an environmentally and socially irresponsible use of public land to benefit a privately held company and not the majority of residents or commuters of Virginia. As a tax paying citizen, at the beginning of my adult life, I ask for protection and justice for me and my children to come. Most of you people on this project will be long gone and me and my generation will be left with this destruction. I implore you to take pause, work with MDOT and FHWA and find a better solution that safeguards our future.</p>
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190610.07	6/10/2019	Individual	Email	<p>Dear VDOT, Federal Highway Administration, and Elected Officials, Please register my OBJECTION to the proposed expansion to 495 (495 Hot Lanes, 495 NEXT, I-495 Express Lanes Northern Extension Study). No to building before Maryland widens the bridge No to phasing No to taking public parks and historic lands Please register the following concerns/flaws with the existing plan: Maryland has just voted to begin work on 270, postponing any work on MD 495 and the American Legion until some time in the undetermined future. 2 additional HOT LANES will funnel into the same American Legion Bridge; 2 additional lanes into the same bottleneck does not solve the Virginia traffic jams, it adds to it. This moves the problem; it doesn't solve the problem. What a waste of public and taxpayer funds. The solution is for the bridge to be widened, another crossing be added, or mass transportation to be added. We need more public transport. Proposed Flyover Ramps and tolls will connect the HOT LANES to the George Washington Parkway. Parts of 3 parks, our historic byway and the rare and pristine Scott's Run will be taken. This parkland is deeply special to me having grown up as a child loving the park and nature there throughout my life. No Environmental Impact Study has been undertaken. You've got to be kidding me. Do an environmental impact study. Numerous conflict of interest concerns exist. There have been no thorough, independent, or transparent reviews of environmental, noise, and traffic studies (assessments or models). Our public land and infrastructure will be given to a private company in exchange for citizens paying tolls on HOT Lanes. No general purpose lanes will be added, and HOT Lanes are unaffordable to the average commuter on a daily basis. This is an environmentally and socially irresponsible use of public land to benefit a privately held company and not the majority of residents or commuters of Virginia. As a tax paying citizen, at the beginning of my adult life, I ask for protection and justice for me and my children to come. Most of you people on this project will be long gone and me and my generation will be left with this destruction. I implore you to take pause, work with MDOT and FHWA and find a better solution that safeguards our future.</p>
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190610.06	6/10/2019	Individual	Email	<p>â?ol-495 Express Lanes Northern Extension Studyâ? -- Comments Dear VDOT, Federal Highway Administration, and Elected Officials, Please register my OBJECTION to the proposed expansion to 495 (495 Hot Lanes, 495 NEXT, I-495 Express Lanes Northern Extension Study). No to building before Maryland widens the bridge No to phasing No to taking public parks and historic lands Please register the following concerns/flaws with the existing plan: Maryland has just voted to begin work on 270, postponing any work on MD 495 and the American Legion until some time in the undetermined future. 2 additional HOT LANES will funnel into the same American Legion Bridge; 2 additional lanes into the same bottleneck does not solve the Virginia traffic jams, it adds to it. This moves the problem; it doesnâ?Tt solve the problem. The solution is for the bridge to be widened, another crossing be added, or mass transportation to be added. Proposed Flyover Ramps and tolls will connect the HOT LANES to the George Washington Parkway. Parts of 3 parks, our historic byway and the rare and pristine Scottâ?Ts Run will be taken. No Environmental Impact Study has been undertaken. Numerous conflict of interest concerns exist. There have been no thorough, independent, or transparent, reviews of environmental, noise, and traffic studies (assessments or models). Our public land and infrastructure will be given to a private company in exchange for citizens paying tolls on HOT Lanes. No general purpose lanes will be added, and HOT Lanes are unaffordable to the average commuter on a daily basis. I implore you to take pause, work with MDOT and FWHA and find a better solution that safeguards our future.</p>
190610.05	6/10/2019	Individual	Email	<p>Can anything be done about the Maryland commuters clogging up our neighborhood streets? I live in The Reserve off Georgetown Pike. One of the worst spots is Swinks Mill and Georgetown Pike. The Marylanders cut over on Swinks Mill adding to the miles long line of cars on Georgetown Pike traveling towards 495. Often the backup is before Swinks Mill because drivers stop there to let in all the cars even though traffic is moving on the other side and there is no light or stop sign. Ideally, only residents on Swinks Mill should be allowed to access that road during rush hour. I can't imagine living on that road and having to sit bumper to bumper with Maryland license plates just to get out of your own neighborhood.</p>

190610.04	6/10/2019	Elected Official	Email	<p>Susan and Abi</p> <p>I am forwarding a Petition signed by several property owners who live on Spencer Road in the Saigon neighborhood. They are very concerned that the sound wall along I495 could be moved closer to the front of their homes if the HOT Lanes are extended. I have walked their back yards and I share their concerns. Given that the sound wall already “juts” toward their properties, it does not appear that the wall in front of their properties would need to be moved even if the Hot Lanes are extended. However, they and I want to make certain the record reflects that we are strongly opposed to any additional encroachment toward or into their properties. Thank you very much for considering our comments.</p>
190610.03	6/10/2019	Individual	Email	<p>What features of the preliminary concept plans and options of the I-495 NEXT study do you like?</p> <p>I like extending the toll road to the American Legion bridge.</p> <p>What features of the preliminary concept plans and options of the I-495 NEXT study do you have concerns about?</p> <p>Do you have any additional comments or suggestions regarding the information provided at the May 20, 2019 Public Information Meeting?</p> <p>Additional comments, suggestions, or questions you have about the I-495 NEXT study.</p>
190610.02	6/10/2019	Individual	Email	<p>Dear VDOT, Federal Highway Administration, and Elected Officials, Please register my OBJECTION to the proposed expansion to 495 (495 Hot Lanes, 495 NEXT, I-495 Express Lanes Northern Extension Study). No to building before Maryland widens the bridge No to phasing No to taking public parks and historic lands Please register the following concerns/flaws with the existing plan: Maryland has just voted to begin work on 270, postponing any work on MD 495 and the American Legion until some time in the undetermined future. 2 additional HOT LANES will funnel into the same American Legion Bridge; 2 additional lanes into the same bottleneck does not solve the Virginia traffic jams, it adds to it. This moves the problem; it doesn't solve the problem. The solution is for the bridge to be widened, another crossing be added, or mass transportation to be added. Proposed Flyover Ramps and tolls will connect the HOT LANES to the George Washington Parkway. Parts of 3 parks, our historic byway and the rare and pristine Scott's Run will be taken. No Environmental Impact Study has been undertaken. Numerous conflict of interest concerns exist. There have been no thorough, independent, or transparent, reviews of environmental, noise, and traffic studies (assessments or models). Our public land and infrastructure will be given to a private company in exchange for citizens paying tolls on HOT Lanes. No general purpose lanes will be added, and HOT Lanes are unaffordable to the average commuter on a daily basis. I implore</p>

				you to take pause, work with MDOT and FWHA and find a better solution that safeguards our future.
190610.01	6/10/2019	Individual	Email	<p>Greetings, Abi.</p> <p>This is a follow up to our phone call on Thursday the 6th, in which I conveyed to you the deep concern which we and many of our neighbors in McLean's Saigon neighborhood feel about the proposed I-495 Express Lanes Northern Extension project. If you remember, three of us (987, 989 and 1010 Spencer Road) have properties right along the sound wall, and any further movement of the wall towards or even into our properties would have grave effects on our quality of life and home resale values.</p> <p>So we have prepared a petition (attached here, with attachments) signed by the six households of Spencer Road (the Tenneys at 987, Bustanis at 989, Johnstons at 1010, Tivels at 985, Amblers at 983 and Chaisson/Shams at 1001) that are most affected by the planned express lane extension and the potential move of the sound wall. Our petition is a request to not move the existing sound wall any further, as it already juts in from the majority of the wall's line to within 10 feet of 987, 989 and 1010 properties. We understand that VDOT has the power to request waivers from a number of highway requirements, as has been granted for many locations along I-495 and I-66.</p> <p>We very much look forward to hearing back from you.</p> <p>Thank you,</p> <p>Enclosures:  Petition  Attachments #1-5</p>



190609.17	6/9/2019	Individual	Email	<p>Dear VDOT, Federal Highway Administration, and Elected Officials, Please register my OBJECTION to the proposed expansion to 495 (495 Hot Lanes, 495 NEXT, I-495 Express Lanes Northern Extension Study). No to building before Maryland widens the bridge No to phasing No to taking public parks and historic lands Please register the following concerns/flaws with the existing plan: Maryland has just voted to begin work on 270, postponing any work on MD 495 and the American Legion until some time in the undetermined future. 2 additional HOT LANES will funnel into the same American Legion Bridge; 2 additional lanes into the same bottleneck does not solve the Virginia traffic jams, it adds to it. This moves the problem; it doesn't solve the problem. The solution is for the bridge to be widened, another crossing be added, or mass transportation to be added. Proposed Flyover Ramps and tolls will connect the HOT LANES to the George Washington Parkway. Parts of 3 parks, our historic byway and the rare and pristine Scott's Run will be taken. No Environmental Impact Study has been undertaken. Numerous conflict of interest concerns exist. There have been no thorough, independent, or transparent, reviews of environmental, noise, and traffic studies (assessments or models). Our public land and infrastructure will be given to a private company in exchange for citizens paying tolls on HOT Lanes. No general purpose lanes will be added, and HOT Lanes are unaffordable to the average commuter on a daily basis. I implore you to take pause, work with MDOT and FHWA and find a better solution that safeguards our future.</p>
190609.16	6/9/2019	Individual	Email	<p>Dear Mr. Lerner,</p> <p>Thank you and Susan Shaw for sharing information with the public at your meeting on May 20, 2019, at Cooper Middle School. As the Secretary for the Saigon Citizens' Association, I am submitting comments prior to the June 10, 2019 deadline to be included in the public meeting summary.</p> <p>Saigon is a neighborhood that abuts the outer loop of the Beltway from south of the Georgetown Pike overpass to the Beltway bridge over Scotts' Run. By and large, we do not oppose the HOV lanes, but we want to mitigate their effect on our neighborhood. Several of our properties will be affected by the planned expansion to accommodate the HOV lanes, but two properties are already very close to the existing sound wall. This request asks that you keep the sound wall intact from 987 Spencer Road to 1010 Spencer Road because the sound wall already juts into our neighborhood along that section farther than it does in the adjoining neighborhoods. We believe that VDOT can avoid engineering and safety problems</p>

			posed by high tension electrical transmission lines and the Swinks Mill Substation and accommodate this request with little difficulty.
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190609.15	6/9/2019	Individual	Email	<p>June 9, 2019 Dear Sirs: The Saigon Citizens Association requests a 15-foot waiver to a portion of VDOT's planned Limit of Disturbance (LOD) of the sound wall along the Outer Loop of the Beltway from 987 Spencer Road to 1010 Spencer Road, located on either side of the Swinks Mill Substation. The sound wall currently juts into Saigon at each end of the substation. This waiver would simply extend the unchanged portion of the sound wall on either side of the substation. A picture is worth a thousand words, so please see the sound wall drawn on the attached map in red. Although we are concerned about all affected Saigon properties, we are especially concerned about 987 and 989 Spencer Road, that are 25 yards from the existing sound wall. Although we understand that current VDOT plans would not take any private property, it would move the sound wall approximately 10-15 feet into the neighborhood. If VDOT moves the sound wall as indicated in the May 20, 2019 public meeting, then the sound wall will be approximately 30 yards from the back of the two houses. The Saigon Citizens Association believes that property values will decrease, and our quality of life will suffer by moving the sound wall into our neighborhood. We believe that VDOT will cut down trees and leave the houses staring at a blank concrete wall. It may also increase the noise level, vibration, and degrade air and water quality. The sound wall will be underneath the high-tension electrical transmission lines. The requested waiver would solve engineering and safety problems because VDOT could maintain a safe distance from the existing high-tension electrical transmission lines bordering the sound wall on the Outer Loop of the Beltway. VDOT would alleviate the need to encroach on the Swinks Mill electrical substation that is an alternate energy supplier to the CIA and other government agencies. Secondly, the Saigon Citizens Association asks that VDOT not use Saigon neighborhood as a storage area for their road building equipment. Saigon Road is an old country lane that has steep hills, hairpin turns, no shoulders or sidewalks, one street light, and deep country ditches. We have many young children and elderly people who walk or ride bicycles in the middle of the road every day. We like it that way, but it is unsafe for large construction vehicles. We do not want VDOT to rent space to park large vehicles overnight at the very end of our neighborhood. Finally, Fairfax County has announced plans to pave an existing small wood chip trail on the Saigon side of the sound wall and expand it to a ten-foot wide asphalt trail. We are fine with the wood chip trail, but we oppose an asphalt trail because we believe it will simply encourage burglars to use motorcycles or All-Terrain Vehicles (ATVs) to burglarize our properties and make a quick getaway. We recognize the need to increase traffic throughput on the Beltway and the American Legion Bridge, but we also wish to protect our quality of life during and after construction. Saigon is a neighborhood of 66</p>
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			<p>homes located near the outer loop of the Beltway (I-495) due south of Beaufort Park and the Georgetown Pike overpass. Saigon currently has three houses under construction and a fourth house undergoing major renovation. The median property value in Saigon is more than \$1 million in value. We wish to maintain our property values, and Virginia needs the taxes we provide.</p>
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190619.14	6/9/2019	Individual	Email	<p>Dear VDOT, Federal Highway Administration, and Elected Officials, Please register my OBJECTION to the proposed expansion to 495 (495 Hot Lanes, 495 NEXT, I-495 Express Lanes Northern Extension Study). No to building before Maryland widens the bridge No to phasing No to taking public parks and historic lands Please register the following concerns/flaws with the existing plan: Maryland has just voted to begin work on 270, postponing any work on MD 495 and the American Legion until some time in the undetermined future. 2 additional HOT LANES will funnel into the same American Legion Bridge; 2 additional lanes into the same bottleneck does not solve the Virginia traffic jams, it adds to it. This moves the problem; it doesn't solve the problem. The solution is for the bridge to be widened, another crossing be added, or mass transportation to be added. Proposed Flyover Ramps and tolls will connect the HOT LANES to the George Washington Parkway. Parts of 3 parks, our historic byway and the rare and pristine Scott's Run will be taken. No Environmental Impact Study has been undertaken. Numerous conflict of interest concerns exist. There have been no thorough, independent, or transparent, reviews of environmental, noise, and traffic studies (assessments or models). Our public land and infrastructure will be given to a private company in exchange for citizens paying tolls on HOT Lanes. No general purpose lanes will be added, and HOT Lanes are unaffordable to the average commuter on a daily basis. I implore you to take pause, work with MDOT and FHWA and find a better solution that safeguards our future.</p>
190609.13	6/9/2019	Individual	Email	<p>I Vote NO to PHASED HOTLanes.  I Vote NO to HOTLanes that Further Harm our 495 Drivers &amp; 495 North Traffic Congestion, Area Traffic Congestion, McLean Traffic Congestion, Neighborhood Traffic Congestion, Infrastructure, Parklands &amp; Historic Parklands, Homes, Property Values, Tax Base, Pollution Levels, and the Health &amp; Wellbeing of our Area Families and Children.  Your traffic decisions have ruined an entire community.</p>

190609.12	6/9/2019	Individual	Email	<p>Dear VDOT, Federal Highway Administration, and Elected Officials, Please register my OBJECTION to the proposed expansion to 495 (495 Hot Lanes, 495 NEXT, I-495 Express Lanes Northern Extension Study). No to building before Maryland widens the bridge No to phasing No to taking public parks and historic lands Please register the following concerns/flaws with the existing plan: Maryland has just voted to begin work on 270, postponing any work on MD 495 and the American Legion until some time in the undetermined future. 2 additional HOT LANES will funnel into the same American Legion Bridge; 2 additional lanes into the same bottleneck does not solve the Virginia traffic jams, it adds to it. This moves the problem; it doesn't solve the problem. The solution is for the bridge to be widened, another crossing be added, or mass transportation to be added. Proposed Flyover Ramps and tolls will connect the HOT LANES to the George Washington Parkway. Parts of 3 parks, our historic byway and the rare and pristine Scott's Run will be taken. No Environmental Impact Study has been undertaken. Numerous conflict of interest concerns exist. There have been no thorough, independent, or transparent, reviews of environmental, noise, and traffic studies (assessments or models). Our public land and infrastructure will be given to a private company in exchange for citizens paying tolls on HOT Lanes. No general purpose lanes will be added, and HOT Lanes are unaffordable to the average commuter on a daily basis. I implore you to take pause, work with MDOT and FHWA and find a better solution that safeguards our future</p>
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190609.11	6/9/2019	Individual	Email	<p>Dear VDOT, Federal Highway Administration, and Elected Officials,  Please register my OBJECTION to the proposed expansion to 495 (495 Hot Lanes, 495 NEXT, I-495 Express Lanes Northern Extension Study).  No to building before Maryland widens the bridge  No to fly over ramps connecting 495 to GWP  No to taking public parks and historic lands  Please register the following concerns/flaws with the existing plan:  This project is premature and being rushed. With Maryland not proceeding at the same pace, it seems incomprehensible that the project proposed by Virginia will improve conditions if the Hot Lanes end at the American Legion Bridge. Two additional lanes into the same bottleneck does not solve the Virginia traffic jams, it adds to it.  The community has serious concerns that there has not been full transparency in the planning of the project. We are in the process of filing several Freedom of Information Act requests to ensure that the public has complete information and an accurate record before making decisions about whether to oppose or support the project.  Until we see the relevant records, we do not have confidence that proper environmental studies have been done to assess the full impact of the project on environmentally sensitive areas. Proposed Flyover Ramps and tolls will connect the HOT LANES to the George Washington Parkway. Parts of 3 parks, our historic byway and the rare and pristine Scott's Run will be taken.  A complete assessment of the need for sound walls in the area has yet to be undertaken or shared with the community. We believe sound walls are vital to minimizing possible sever impact on certain neighborhoods impacted by the project.  No general purpose lanes will be added, and HOT Lanes are unaffordable to the average commuter on a daily basis.  I respectfully request that the project be suspended and the comment period be extended so that the citizens of the community can have full and complete transparency in evaluating the project and that other, more environmentally sound and forward-thinking solutions can be considered.</p>
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190609.10	6/9/2019	Individual	Email	<p>I am submitting the following emails to VDOT to be entered into their COMMENT SECTION for Proposed PHASED HOTLanes ( 1-495 Express Lanes Northern Extension Study). Hopefully, these Commnets will soon appear Online at VDOT Project Site for Public and Officials' Review.Abi Lerner wrote to me about an Extension Comment Deadline to June 18th .An email blast was to be sent Friday.I received Nothing. I must be on every VDOT and Officials's List . Yet, I received No Email Date Extension Blast. No Reports from Neighbors of Notice Blast.Who received this Notice ?I Vote NO to PHASED HOTLanes.I Vote NO to HOTLanes that Further Harm our 495 Drivers &amp; 495 North Traffic Congestion, Area Traffic Congestion, McLean Traffic Congestion, Neighborhood Traffic Congestion, Infrastructure, Parklands &amp; Historic Parklands, Homes, Property Values, Tax Base, Pollution Levels, and the Health &amp; Wellbeing of our Area Families and Children.Officials ,VDOT Comment Deadline for their May 20th VDOT PHASED HOTLANES Meeting is JUNE 10th, Monday !Residents are asking if there have been Responses from any Officials to Requests I sent June 5th, especially the Request to Extend the VDOT Comment Period.The answer is NO. Not yet.Is anyone contacting VDOT with this Request on behalf of Residents ?Please let us all know what You are doing for Us asap.Silence condones what VDOT is dictating for this rushed Project.Public Transparency and Public Process &amp; Representation is crucial.VDOT scheduled this Meeting during a most difficult time for Taxpaying Residents and Officials. Many could not attend and did not attend. There were Graduations, Weddings, Fundraisers, Meeting Conflicts, Travel Plans for that Monday before Memorial Day Weekend.This is the only Community Meeting until VDOT Fall Decision Meeting ! Many Taxpayers feel this is definitely a DONE DEAL because of the way the entire Process has been restrictively handled by VDOT and some Officials.Residents had to fight for a Public Q &amp; A Session during May 20th Meeting !Susan Shaw agreed to Public Q &amp; A on Record during a MCA Transportation Meeting on May 14th.Susan stated it would be like the June 11, 2018 Meeting with Q &amp; A and a Mike....Comments and Questions welcomed and recorded. Residents had to fight to get that 2018 Q &amp; A also.However, May 20th was not the same.The 1 hour Public Comment Period was reduced to 1/2 hour . 1/2 hour was added to project presentation.Before the Meeting I spoke with Susan Shaw and told her I would make a Comment as usual. She appeared fine with this.Susan Shaw announced at the beginning of the Q &amp; A that there would be NO Comments. Only One Question per Resident !I said to Susan that I had missed that memo and would read my comment as intended.Susan kept interrupting me and finally told me to STOP. My time "allowed" was much shorter than most single Questions that followed.Some Residents did not adhere to this restrictive format. The Questions were thoughtful and complex as is this Project. Susan Shaw extended Q &amp; A</p>
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time.Representative Wexton, Senator Favola , Delegate Murphy and Supervisor Foust sent representatives to May 20th Meeting. Supervisor Foust arrived late and missed much of the Questions and Responses.Residents, Stakeholders, unable to attend have no idea what is going on with this PHASED Project or the insightful Questions asked and Comments made during the Meeting May 20th.Officials have no idea what was Asked and the Responses from Susan Shaw of VDOT.Officials would probably appreciate having the Questions and Answers supplied for this complicated and illogical PHASED Project.Officials...Don't you want to know the Insightful Questions and Answers ? Don't you care ?Why are the Recordings of the Q & A not online for All to Hear & Review ?!Public Transparency and Process are important.Officials...Please ask VDOT to put Recordings online for Public Transparency and Public Process.Officials please ask VDOT to place Residents' Comments online for Public Transparency and Sharing of Ideas for the Democratic Process.Residents deserve more than a VDOT "summary" of their entries after the fact....A summary that does not reflect the actual facts.Officials, please reread my June 5th Email that follows.Officials please Respond to this Email. Officials Please ACT !Thank You,



190609.09	6/9/2019	Individual	Email	<p>Dear VDOT, Federal Highway Administration, and Elected Officials, Please register my OBJECTION to the proposed expansion to 495 (495 Hot Lanes, 495 NEXT, I-495 Express Lanes Northern Extension Study). No to building before Maryland widens the bridge No to phasing No to taking public parks and historic lands Please register the following concerns/flaws with the existing plan: Maryland has just voted to begin work on 270, postponing any work on MD 495 and the American Legion until some time in the undetermined future. 2 additional HOT LANES will funnel into the same American Legion Bridge; 2 additional lanes into the same bottleneck does not solve the Virginia traffic jams, it adds to it. This moves the problem; it doesn't solve the problem. What a waste of public and taxpayer funds. The solution is for the bridge to be widened, another crossing be added, or mass transportation to be added. We need more public transport. Proposed Flyover Ramps and tolls will connect the HOT LANES to the George Washington Parkway. Parts of 3 parks, our historic byway and the rare and pristine Scott's Run will be taken. This parkland is deeply special to me having grown up as a child loving the park and nature there throughout my life. No Environmental Impact Study has been undertaken. You've got to be kidding me. Do an environmental impact study. Numerous conflict of interest concerns exist. There have been no thorough, independent, or transparent reviews of environmental, noise, and traffic studies (assessments or models). Our public land and infrastructure will be given to a private company in exchange for citizens paying tolls on HOT Lanes. No general purpose lanes will be added, and HOT Lanes are unaffordable to the average commuter on a daily basis. This is an environmentally and socially irresponsible use of public land to benefit a privately held company and not the majority of residents or commuters of Virginia. I implore you to take pause, work with MDOT and FHWA and find a better solution that safeguards our future.</p>
190609.08	6/9/2019	Individual	Email	<p>I am shocked and disappointed that you would consider rebuilding the Georgetown Pike interchange bridge and still not address the congestion issues caused by the current HOT lanes the shoulder expansion project. Currently VDOT has a "working area" on the SW corner of the intersection. That could be relocated and a circular ramp could be built to accommodate the eastbound traffic entering 495. This would help significantly with the flow onto the beltway from the eastbound traffic. I am sure there are other solutions as well. I strongly urge you to spend some time on this issue while you are considering rebuilding the interchange. The American Legion Bridge is one of the biggest choke points in the US. Why isn't the Federal Highway Administration working with Maryland and Virginia to develop a comprehensive solution? The current HOT lanes get limited use because the access ramps are limited, in most cases do not line up with normal beltway access ramps and HOV require a</p>

				special EZPass. Given this, wouldn't it make more sense to add an additional lane to the current beltway and make it HOV and then add 1 toll only lane with access ramps. This is how most highways encourage carpooling and it allows everyone to use it and access it at any point in their trip.
190609.07	6/9/2019	Individual	Email	In the presentation on May 20 you showed a chart on "Increased Person Throughput". Do you have this slide based on "Increased Vehicle Throughput"? It is very irregular to show traffic measures in terms of people because you can easily manipulate the results by changing the number of people in the vehicles. The only way to reduce the congestion is to reduce the vehicles.
190609.06	6/9/2019	Individual	Email	Dear VDOT, Federal Highway Administration, and Elected Officials, Please register my OBJECTION to the proposed expansion to 495 (495 Hot Lanes, 495 NEXT, I-495 Express Lanes Northern Extension Study). No to building before Maryland widens the bridge No to phasing No to taking public parks and historic lands Please register the following concerns/flaws with the existing plan: Maryland has just voted to begin work on 270, postponing any work on MD 495 and the American Legion until some time in the undetermined future. 2 additional HOT LANES will funnel into the same American Legion Bridge; 2 additional lanes into the same bottleneck does not solve the Virginia traffic jams, it adds to it. This moves the problem; it doesn't solve the problem. The solution is for the bridge to be widened, another crossing be added, or mass transportation to be added. Proposed Flyover Ramps and tolls will connect the HOT LANES to the George Washington Parkway. Parts of 3 parks, our historic byway and the rare and pristine Scott's Run will be taken. No Environmental Impact Study has been undertaken. Numerous conflict of interest concerns exist. There have been no thorough, independent, or transparent, reviews of environmental, noise, and traffic studies (assessments or models). Our public land and infrastructure will be given to a private company in exchange for citizens paying tolls on HOT Lanes. No general purpose lanes will be

				added, and HOT Lanes are unaffordable to the average commuter on a daily basis. I implore you to take pause, work with MDOT and FWHA and find a better solution that safeguards our future.
190609.05	6/9/2019	Individual	Email	<p>VDOT states that the I-495 Northern Extension is an independent, stand-alone project that VDOT would implement whether or not Maryland constructs HOT or express lanes/expanded capacity (âexpanded capacityâ) on I-495 at the American Legion Bridge. At the May 20, 2019 public meeting, VDOT provided a limited comparison of traffic impacts in 2045 between the Build Alternative (defined as implementation of the I-495 Northern Extension, with Maryland having constructed expanded capacity on I-495 at the American Legion Bridge) and the No-Build Alternative (defined as no implementation of the I-495 Northern Extension, with Maryland having constructed expanded capacity on I-495 at the American Legion Bridge). Since it is uncertain whether or when Maryland will construct expanded capacity on I-495 at the American Legion Bridge, it is essential that VDOT provide the public with information on the expected traffic impacts on the I-495 mainline, arterials, and secondary streets within the study corridor, including impacts on cut-through traffic, both in 2025 and 2045, if (a) the I-495 Northern Extension has been built but Maryland has not constructed expanded capacity on I-495 at the American Legion Bridge and (b) neither the I-495 Northern Extension nor expanded capacity on I-495 at the American Legion Bridge have been built. In order to allow the public an adequate time for review, the traffic impact analysis technical study that includes these sensitivity analyses should be made available to the public at least 60 days in advance of the NEPA public hearing on the I-495 Northern Extension currently anticipated for Fall 2019.</p>



190609.04	6/9/2019	Individual	Email	<p>COMMENTS IN OPPOSITION TO PROPOSED EXTENSION OF I-495 EXPRESS LANES, AND IN SUPPORT OF IMMEDIATE MITIGATION OF TRAFFIC CRISIS ON GEORGETOWN PIKE</p> <p><b>SUMMARY</b>These comments are submitted in opposition to the proposed extension of the northbound I-495 express lanes. Instead, VDOT should take immediate action to mitigate the unacceptable and hazardous traffic conditions that currently exist on Georgetown Pike, as a direct consequence of the prior expansion of I-495 and addition of the I-495 express lanes. The proposed extension of the express lanes would only exacerbate the existing traffic meltdown on I-495 and Georgetown Pike, imposing an additional and unacceptable burden on Virginia citizens who live in the neighborhoods along Georgetown Pike, both east and west of the beltway.</p> <p><b>BOTTLENECK CREATED BY PRIOR EXPRESS LANE CONSTRUCTION</b>The ill-advised expansion of I-495 and prior construction of the northbound 495 express lanes created a bottleneck by dumping increased traffic volume into the northbound lanes of I-495, near the Georgetown Pike intersection and the American Legion Bridge. The American Legion Bridge and the I-495 traffic lanes on the Maryland side are utterly inadequate to handle the increased traffic volume, creating enormous backups on northbound I-495 in Virginia and on local connecting roads in Virginia, including Georgetown Pike. The proposed extension of the 495 express lanes would serve no useful purpose. To the contrary, the proposed extension would exacerbate the problem by dumping even more traffic into the bottleneck.</p> <p><b>IMPACT ON GEORGETOWN PIKE</b>The spillover effect on Georgetown Pike, and residents of the neighborhoods along Georgetown Pike, has been devastating. On a daily basis, Georgetown Pike becomes virtually impassable for hours, due largely to Maryland commuters, driving Maryland cars with Maryland tags, who use Georgetown Pike as a cut-through to reach I-495. Georgetown Pike is a winding, two lane road (one lane in each direction) that was the first Virginia road designated as a scenic byway. It was never designed to handle this volume of traffic. The daily backups on Georgetown Pike cut off ingress and egress to neighborhoods both east and west of the beltway, many of which (especially north of Georgetown Pike) have no access to other local roads. Moreover, the extended traffic backups on Georgetown Pike create a public safety nightmare. Because Georgetown Pike is a windy, narrow road with no shoulders in many places, emergency vehicles including police, fire, and ambulances are blocked and delayed by traffic sitting bumper to bumper that literally has no place to move over.</p> <p><b>THE PROPOSED EXTENSION OF THE I-495 EXPRESS LANES SHOULD BE REJECTED</b> The proposed extension of the 495 express lanes would exacerbate the already unbearable traffic problems on Georgetown Pike, and should be rejected. There is no conceivable justification for further burdening Virginia residents along Georgetown Pike. Moreover, there will be no</p>
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additional traffic capacity on the Maryland side for many years, if ever. Maryland has no concrete plan for expanding traffic lanes on the American Legion Bridge or on the Maryland portion of I-495, and no concrete plan for funding any such expansion. Thus, there would be no benefit to the proposed extension, which would deliver even more traffic to the existing bottleneck and add to the existing traffic crisis on Georgetown Pike. VDOT SHOULD TAKE IMMEDIATE ACTION TO RELIEVE THE CURRENT TRAFFIC CRISIS ON GEORGETOWN PIKE VDOT should move immediately to alleviate the traffic crisis on Georgetown Pike created by the I-495 expansion and express lanes. First, VDOT should immediately close the ramp from Georgetown Pike onto northbound I-495. Most of the current problem on Georgetown Pike is created by Maryland commuters improperly using Georgetown Pike as a cut-through. VDOT should prioritize the protection of local Virginia residents who live in the affected neighborhoods along Georgetown Pike, and who have been unfairly burdened by traffic overwhelming a local road that is simply inadequate to handle the increased traffic. It should be emphasized that the neighborhoods in question were built long before the I-495 express lanes, and many of the local residents have lived in these neighborhoods for decades. By contrast, there are no equities favoring the cut-through commuters who have hijacked Georgetown Pike, but have no local ties to the community. Closing the ramp from Georgetown Pike onto northbound I-495 is the only solution that will provide near term relief from the current traffic crisis on Georgetown Pike. In the longer run, there are other measures that VDOT could consider to alleviate this crisis. For example, VDOT could consider adding ramps from Old Dominion Drive (which parallels Georgetown Pike) to I-495, from the existing bridge at the intersection of Old Dominion and I-495. VDOT also could consider adding dedicated through lanes on Georgetown Pike so that local traffic moving through the intersection with I-495 could avoid traffic backups at 495. To be effective, however, any such through lane would have to begin well before the intersection of Georgetown Pike and I-495, and would have to be accessible only to local traffic. Although VDOT may wish to consider such longer term measures in the future, relief on Georgetown Pike is required now. The only acceptable solution is to close the ramp from Georgetown Pike to northbound I-495 immediately, and reserve Georgetown Pike for local traffic.

190609.03	6/9/2019	Individual	Email	<p>What features of the preliminary concept plans and options of the I-495 NEXT study do you like?</p> <p>I like the focus on many or the traffic issues.</p> <p>What features of the preliminary concept plans and options of the I-495 NEXT study do you have concerns about?</p> <p>I am not sure there is enough focus on the Georgetown Pike Route 193 intersection with Route 495 North and Route 495 South. I have submitted comments and suggestions below that can be installed/ implemented right away. I think the express lane extension will help the 495 flow but will not address the local cut through problems in 22102 and 22101 at Route 193 East and West at Route 495. Since we have to be patient for some of the overall studies to be complete</p> <p>Do you have any additional comments or suggestions regarding the information provided at the May 20, 2019 Public Information Meeting?</p> <p>Additional comments, suggestions, or questions you have about the I-495 NEXT study.</p> <p>Easy fixes that can be installed right away: 1) Install vertical lane dividers for through traffic for the right lane going East on Route 193 past Route 495 entrance North. This will eliminate the drivers who block the through traffic lane while they force a merge onto Route 495 North. There is a tiny sign that violators ignore. 2) Install vertical lane dividers for through traffic for the right lane going west on Route 193 past Route 495 entrance South. This will eliminate the drivers who block the through traffic lane while they force their way through the intersection to get onto Route 495 North and will reduce the illegal right turns from the through traffic lane. 3) Close the left turn opening from Dead Run Drive cut through traffic onto Route 193 West. Almost all traffic using this cut though for both cars and trucks have Maryland plates. Drivers travel at unsafe speeds and endanger local residents until they arrive at Route 193. They then force a left turn to cut across Route 193 to get to Route 495 North while blocking and interfering with through traffic flow and legitimate Route 495 entrance. Suggestions for managing traffic flow: 1) Install a meaningful toll (example \$10.00 at Route 7) entrance to Georgetown Pike Route 193 East from 6:30 am to 8:30 am and 3:30 pm to 7:00 pm. Possibly add other toll locations as drivers will attempt to bypass. This will cause drivers to reconsider cutting through residential neighborhoods and stay on Route 7. Local residents and local business should get an exemption. Use the proceeds to pay for Scott's Run parking and safety improvements. 2) Design and install entrance ramps for Northbound and Southbound traffic at Lewinsville Road and 495 North intersection. This is natural traffic flow and relief for traffic from Route 7 and the Dulles Toll Road plus easier access for emergency vehicles. 3)</p>
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				Design and install entrance ramps for Northbound and Southbound traffic at Old Dominion Drive and Route 495 intersection. This additional access to Route 495 will reduce the Georgetown Pike traffic volume at all times during the day.
190609.02	6/9/2019	Individual	Email	Dear Susan, I thought the presentation went well and you did a good job of controlling the McLean crowd. I am in favor of the Northern Extensions and am glad that there will not be a 193 exit. One suggestion I have is that there should be a ramp from the southbound Beltway to the Dulles Access Road. Currently, it is very difficult to cross over the toll road to get to the access road, especially if there is heavy traffic. Perhaps you could get the Airport Authority to pay for it since they want to grow Dulles Airport usage.

190609.01	6/9/2019	Individual	Email	<p>What features of the preliminary concept plans and options of the I-495 NEXT study do you like?</p> <p>I like having more 495 lanes. In principal I appreciate the extension of the express lanes. I like keeping the express lane entrance/exit on the inside of the beltway and toward the river wherever possible, with less disruption to feeder roads and property values. I like increasing the lanes on the Georgetown Pike overpass. Build that one first!</p> <p>What features of the preliminary concept plans and options of the I-495 NEXT study do you have concerns about?</p> <p>Do NOT limit access to the beltway at Georgetown Pike. I am deeply concerned about the length of time (2045) of disruption. This is a profound issue for commuters, for public safety and for property values in what are currently well-to-do and luxury neighborhoods. The traffic flow on Georgetown Pike is disgraceful. It daily takes 20 minutes or more to drive from Potomac River Road to and from 495, less than a mile! Construction will increase that problem. Property values are already declining. There will be a mass exodus of homeowners and it will be nearly impossible to sell our homes. Do NOT raise taxes in the communities that will bear the burden of this massive construction project. I recommend waiting for Maryland to be ready. They should be required to move expeditiously, 25 years of construction is totally unacceptable.</p> <p>Do you have any additional comments or suggestions regarding the information provided at the May 20, 2019 Public Information Meeting?</p> <p>In the strongest possible terms I urge you to look at the Georgetown Pike (outside the beltway) traffic issues. There has been a recent influx of attention and tourism at Scottã?Ts run which has created a major safety issue. People are parking their cars on Georgetown Pike because the small parking areas are full and are then walking along the side of the road, wearing bathing suits, carrying picnic baskets, with children and pets. It is a safety disaster waiting to happen. I urge additional police presence at the intersection of Swinks Mill and Georgetown Pike. I urge that Georgetown Pike be quickly made a no parking zone and that signs be erected to that fact. I urge that cars that parked on Georgetown Pike should receive a maximum fine parking ticket, and people found walking in the road should be stopped by the police. I am deeply concerned that a young child will be injured, if not killed in the chaos that has resulted from increased traffic, tourism and marketing of the Scottã?Ts Run park area.</p> <p>Additional comments, suggestions, or questions you have about the I-495 NEXT study</p>
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190608.10	6/8/2019	Individual	Email	<p>What features of the preliminary concept plans and options of the I-495 NEXT study do you like?The special new connection to GWParkway. The extra lanes. I like that the approaches to the interchange will be widened and that there will be a dedicated through lane for eastbound traffic on Georgetown Pike over the Beltway. I like that there will not be an HOV-3 exit at our Georgetown Pike exit.What features of the preliminary concept plans and options of the I-495 NEXT study do you have concerns about?Until Maryland widens the bridge and the beltway, I'm concerned we are just moving the bottleneck to the edge of the bridge. I hope there can truly be a dedicated lane for thru traffic. Residents who need to get to their kids' schools on the other (east) side of the Beltway get stuck with Maryland commuters who are trying to get to the front of the line to access 495.Do you have any additional comments or suggestions regarding the information provided at the May 20, 2019 Public Information Meeting? The concepts of the "2045 Build / No Build" were weak and based on multiple potential assumptions Mr Lerner used in his presentation that confused the attendees. For example, part of the NO BUILD scenario includes the assumption that Maryland will expand the Legion Bridge and build its additional lanes. This is not a solid base for the NO BUILD option because those plans are still far from concrete. Add on and off ramps to the new bridge at Old Dominion to spread out the load on Georgetown Pike.Additional comments, suggestions, or questions you have about the I-495 NEXT study. Redesign the intersection at Georgetown Pike, Balls Hill Road and the Beltway. Traffic flow from Georgetown Pike in both directions confronts and blocks traffic from Balls Hill road. A better pattern of lanes to join beltway traffic towards the river would smooth out and speed up flow. Now, even when traffic lights are green, these sources of cars block and delay traffic. Mornings for us residents in this area are chaotic and dangerous for our kids and families. While I hope that the VDOT and MDOT coordinate, ultimately as resident of Virginia I would like to see more aggressive advocacy from VDOT on our behalf. Put the politics aside and do what's right for VA residents in the area. We are taxpayers and voters and our voice matters.</p>
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190608.09	6/8/2019	Individual	Email	<p>What features of the preliminary concept plans and options of the I-495 NEXT study do you like? I like that the approaches to the interchange will be widened and that there will be a dedicated through lane for eastbound traffic on Georgetown Pike over the Beltway. The special new connection to GW Parkway. The extra lanes. I like that there will not be an HOV-3 exit at our Georgetown Pike exit. What features of the preliminary concept plans and options of the I-495 NEXT study do you have concerns about? Until Maryland widens the bridge and the beltway, I'm concerned we are just moving the bottleneck to the edge of the bridge. I hope there can truly be a dedicated lane for thru traffic. Residents who need to get to their kids' schools on the other (east) side of the Beltway get stuck with Maryland commuters who are trying to get to the front of the line to access 495. Do you have any additional comments or suggestions regarding the information provided at the May 20, 2019 Public Information Meeting? Add on and off ramps to the new bridge at Old Dominion to spread out the load on Georgetown Pike. The concepts of the "2045 Build / No Build" were weak and based on multiple potential assumptions Mr Lerner used in his presentation that confused the attendees. For example, part of the NO BUILD scenario includes the assumption that Maryland will expand the Legion Bridge and build its additional lanes. This is not a solid base for the NO BUILD option because those plans are still far from concrete. Additional comments, suggestions, or questions you have about the I-495 NEXT study. Redesign the intersection at Georgetown Pike, Balls Hill Road and the Beltway. Traffic flow from Georgetown Pike in both directions confronts and blocks traffic from Balls Hill road. A better pattern of lanes to join beltway traffic towards the river would smooth out and speed up flow. Now, even when traffic lights are green, these sources of cars block and delay traffic. Mornings for us residents in this area are chaotic and dangerous for our kids and families. While I hope that the VDOT and MDOT coordinate, ultimately as resident of Virginia I would like to see more aggressive advocacy from VDOT on our behalf. Put the politics aside and do what's right for VA residents in the area. We are taxpayers and voters and our voice matters.</p>
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190608.08	6/8/2019	Individual	Email	<p>What features of the preliminary concept plans and options of the I-495 NEXT study do you like?The special new connection to GWParkway. The extra lanes. I like that the approaches to the interchange will be widened and that there will be a dedicated through lane for eastbound traffic on Georgetown Pike over the Beltway. I like that there will not be an HOV-3 exit at our Georgetown Pike exit.What features of the preliminary concept plans and options of the I-495 NEXT study do you have concerns about?Until Maryland widens the bridge and the beltway, I'm concerned we are just moving the bottleneck to the edge of the bridge. I hope there can truly be a dedicated lane for thru traffic. Residents who need to get to their kids' schools on the other (east) side of the Beltway get stuck with Maryland commuters who are trying to get to the front of the line to access 495.Do you have any additional comments or suggestions regarding the information provided at the May 20, 2019 Public Information Meeting? Add on and off ramps to the new bridge at Old Dominion to spread out the load on Georgetown Pike. The concepts of the "2045 Build / No Build" were weak and based on multiple potential assumptions Mr Lerner used in his presentation that confused the attendees. For example, part of the NO BUILD scenario includes the assumption that Maryland will expand the Legion Bridge and build its additional lanes. This is not a solid base for the NO BUILD option because those plans are still far from concrete.Additional comments, suggestions, or questions you have about the I-495 NEXT study. Redesign the intersection at Georgetown Pike, Balls Hill Road and the Beltway. Traffic flow from Georgetown Pike in both directions confronts and blocks traffic from Balls Hill road. A better pattern of lanes to join beltway traffic towards the river would smooth out and speed up flow. Now, even when traffic lights are green, these sources of cars block and delay traffic. Mornings for us residents in this area are chaotic and dangerous for our kids and families. While I hope that the VDOT and MDOT coordinate, ultimately as resident of Virginia I would like to see more aggressive advocacy from VDOT on our behalf. Put the politics aside and do what's right for VA residents in the area. We are taxpayers and voters and our voice matters.</p>
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190608.07	6/8/2019	Individual	Email	<p>What features of the preliminary concept plans and options of the I-495 NEXT study do you like? I like that there will not be an HOV-3 exit at our Georgetown Pike exit. The special new connection to GWParkway. The extra lanes. I like that the approaches to the interchange will be widened. I like that there will be a dedicated through lane for eastbound traffic on Georgetown Pike over the Beltway. What features of the preliminary concept plans and options of the I-495 NEXT study do you have concerns about? I hope there can truly be a dedicated lane for thru traffic. Residents who need to get to their kids' schools on the other (east) side of the Beltway get stuck with Maryland commuters who are trying to get to the front of the line to access 495. Until Maryland widens the bridge and the beltway, I'm concerned we are just moving the bottleneck to the edge of the bridge. Do you have any additional comments or suggestions regarding the information provided at the May 20, 2019 Public Information Meeting? The concepts of the "2045 Build / No Build" were weak and based on multiple potential assumptions Mr Lerner used in his presentation that confused the attendees. For example, part of the NO BUILD scenario includes the assumption that Maryland will expand the Legion Bridge and build its additional lanes. This is not a solid base for the NO BUILD option because those plans are still far from concrete. Add on and off ramps to the new bridge at Old Dominion to spread out the load on Georgetown Pike. Additional comments, suggestions, or questions you have about the I-495 NEXT study. Redesign the intersection at Georgetown Pike, Balls Hill Road and the Beltway. Traffic flow from Georgetown Pike in both directions confronts and blocks traffic from Balls Hill road. A better pattern of lanes to join beltway traffic towards the river would smooth out and speed up flow. Now, even when traffic lights are green, these sources of cars block and delay traffic. Mornings for us residents in this area are chaotic and dangerous for our kids and families. While I hope that the VDOT and MDOT coordinate, ultimately as resident of Virginia I would like to see more aggressive advocacy from VDOT on our behalf. Put the politics aside and do what's right for VA residents in the area. We are taxpayers and voters and our voice matters.</p>
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190608.06	6/8/2019	Individual	Email	<p>What features of the preliminary concept plans and options of the I-495 NEXT study do you like?The special new connection to GWParkway. The extra lanes. I like that the approaches to the interchange will be widened and that there will be a dedicated through lane for eastbound traffic on Georgetown Pike over the Beltway. I like that there will not be an HOV-3 exit at our Georgetown Pike exit.What features of the preliminary concept plans and options of the I-495 NEXT study do you have concerns about?Until Maryland widens the bridge and the beltway, I'm concerned we are just moving the bottleneck to the edge of the bridge. I hope there can truly be a dedicated lane for thru traffic. Residents who need to get to their kids' schools on the other (east) side of the Beltway get stuck with Maryland commuters who are trying to get to the front of the line to access 495.Do you have any additional comments or suggestions regarding the information provided at the May 20, 2019 Public Information Meeting? Add on and off ramps to the new bridge at Old Dominion to spread out the load on Georgetown Pike. The concepts of the "2045 Build / No Build" were weak and based on multiple potential assumptions Mr Lerner used in his presentation that confused the attendees. For example, part of the NO BUILD scenario includes the assumption that Maryland will expand the Legion Bridge and build its additional lanes. This is not a solid base for the NO BUILD option because those plans are still far from concrete.Additional comments, suggestions, or questions you have about the I-495 NEXT study. Redesign the intersection at Georgetown Pike, Balls Hill Road and the Beltway. Traffic flow from Georgetown Pike in both directions confronts and blocks traffic from Balls Hill road. A better pattern of lanes to join beltway traffic towards the river would smooth out and speed up flow. Now, even when traffic lights are green, these sources of cars block and delay traffic. Mornings for us residents in this area are chaotic and dangerous for our kids and families. While I hope that the VDOT and MDOT coordinate, ultimately as resident of Virginia I would like to see more aggressive advocacy from VDOT on our behalf. Put the politics aside and do what's right for VA residents in the area. We are taxpayers and voters and our voice matters.</p>
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190608.05	6/8/2019	Individual	Email	<p>What features of the preliminary concept plans and options of the I-495 NEXT study do you like?The extra lanes. The special new connection to GWParkway. I like that the approaches to the interchange will be widened and that there will be a dedicated through lane for eastbound traffic on Georgetown Pike over the Beltway. I like that there will not be an HOV-3 exit at our Georgetown Pike exit.What features of the preliminary concept plans and options of the I-495 NEXT study do you have concerns about?I hope there can truly be a dedicated lane for thru traffic. Until Maryland widens the bridge and the beltway, I'm concerned we are just moving the bottleneck to the edge of the bridge. Residents who need to get to their kids' schools on the other (east) side of the Beltway get stuck with Maryland commuters who are trying to get to the front of the line to access 495.Do you have any additional comments or suggestions regarding the information provided at the May 20, 2019 Public Information Meeting? The concepts of the "2045 Build / No Build" were weak and based on multiple potential assumptions Mr Lerner used in his presentation that confused the attendees. For example, part of the NO BUILD scenario includes the assumption that Maryland will expand the Legion Bridge and build its additional lanes. This is not a solid base for the NO BUILD option because those plans are still far from concrete. Add on and off ramps to the new bridge at Old Dominion to spread out the load on Georgetown Pike.Additional comments, suggestions, or questions you have about the I-495 NEXT study. Redesign the intersection at Georgetown Pike, Balls Hill Road and the Beltway. Traffic flow from Georgetown Pike in both directions confronts and blocks traffic from Balls Hill road. A better pattern of lanes to join beltway traffic towards the river would smooth out and speed up flow. Now, even when traffic lights are green, these sources of cars block and delay traffic. Mornings for us residents in this area are chaotic and dangerous for our kids and families. While I hope that the VDOT and MDOT coordinate, ultimately as resident of Virginia I would like to see more aggressive advocacy from VDOT on our behalf. Put the politics aside and do what's right for VA residents in the area. We are taxpayers and voters and our voice matters.</p>
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190608.04	6/8/2019	Individual	Email	<p>What features of the preliminary concept plans and options of the I-495 NEXT study do you like?The special new connection to GWParkway. The extra lanes. I like that the approaches to the interchange will be widened and that there will be a dedicated through lane for eastbound traffic on Georgetown Pike over the Beltway. I like that there will not be an HOV-3 exit at our Georgetown Pike exit.What features of the preliminary concept plans and options of the I-495 NEXT study do you have concerns about?Until Maryland widens the bridge and the beltway, I'm concerned we are just moving the bottleneck to the edge of the bridge. I hope there can truly be a dedicated lane for thru traffic. Residents who need to get to their kids' schools on the other (east) side of the Beltway get stuck with Maryland commuters who are trying to get to the front of the line to access 495.Do you have any additional comments or suggestions regarding the information provided at the May 20, 2019 Public Information Meeting? Add on and off ramps to the new bridge at Old Dominion to spread out the load on Georgetown Pike. The concepts of the "2045 Build / No Build" were weak and based on multiple potential assumptions Mr Lerner used in his presentation that confused the attendees. For example, part of the NO BUILD scenario includes the assumption that Maryland will expand the Legion Bridge and build its additional lanes. This is not a solid base for the NO BUILD option because those plans are still far from concrete.Additional comments, suggestions, or questions you have about the I-495 NEXT study. Redesign the intersection at Georgetown Pike, Balls Hill Road and the Beltway. Traffic flow from Georgetown Pike in both directions confronts and blocks traffic from Balls Hill road. A better pattern of lanes to join beltway traffic towards the river would smooth out and speed up flow. Now, even when traffic lights are green, these sources of cars block and delay traffic. Mornings for us residents in this area are chaotic and dangerous for our kids and families. While I hope that the VDOT and MDOT coordinate, ultimately as resident of Virginia I would like to see more aggressive advocacy from VDOT on our behalf. Put the politics aside and do what's right for VA residents in the area. We are taxpayers and voters and our voice matters.</p>
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190608.03	6/8/2019	Individual	Email	<p>What features of the preliminary concept plans and options of the I-495 NEXT study do you like? absolutely none</p> <p>What features of the preliminary concept plans and options of the I-495 NEXT study do you have concerns about? all of them</p> <p>Do you have any additional comments or suggestions regarding the information provided at the May 20, 2019 Public Information Meeting? please do not extend the hot lanes or widen the beltway in the Georgetown Pike vicinity this will not ease the congestion over the legion bridge we do not want our surrounding neighborhood impacted; we do not want Live Oak Drive or the sound walls next to it impacted</p> <p>Additional comments, suggestions, or questions you have about the I-495 NEXT study. There is absolutely no need for this hot lane extension project. When the American Legion Bridge gets widened, this will reduce the back up on the beltway. Nothing else will solve the congestion issue.</p>
190608.02	6/8/2019	Individual	Email	<p>In my view, VDOT proposed an excellent short-term fix to the Georgetown Pike problem a year ago when they suggested closing access to the Northbound beltway during the evening rush hours. This would take the Maryland commuters off of Georgetown Pike, and while it would impact some Virginia residents who desire to go to Maryland during that period, it would be a very limited number, and for them it would be no worse than it already is. For those who need to access GW Parkway southbound during this period to go to DC, they would continue to have the option of going south on 193 and accessing GW Parkway at 123. This would be much faster than it is now without the current congestion on Georgetown Pike. This would also permit those who have children at Langley HS and Cooper to get to those schools for after-school events. I am tired of being trapped in my neighborhood during the hours of 2-7 PM. Something must be done soon as our property values are going down and it takes us 30 minutes plus to travel less than a mile to the beltway. Thank you</p>

190608.01	6/8/2019	Individual	Email	<p>I'm writing in the support of the shared use path, which if done correctly, might help local residents of Balls Hill, Georgetown Pike, Old Dominion, and Lewinsville Road to get out their neighborhoods during the severe rush hour congestion by using bicycles. It would be better if there were a direct connection to Tysons by extending the path along I-495. At a minimum, however, as the I-496 shared-use path is constructed, VDOT and FCDOT should add sufficient bike and pedestrian facilities to allow uses to safely to Tysons and McLean. Specifically, the project plan would be improved and better prepare the area for the future if it included the following: Separated bike lanes, regular bike lanes or at least sharrows will need to be retained or added to Tyco Road, Jones Branch Drive, and Spring Hill Road south of International Drive. Access from Lewinsville Road along Spring Hill Road underneath the Dulles Toll Road and into Tysons needs to be greatly improved. Currently, there is a narrow and rough paved path and sidewalk from Lewinsville to the Toll Road and then up to the intersection with Jones Branch Road that needs to be widened and improved. Traffic signals in these areas need to be upgraded to account for pedestrians and cyclists. Adequate wayfinding signage should be included in the project to get cyclists and pedestrians to and from the Tysons area to the new I-495 shared use path. Adequate wayfinding signage should be included to get riders and pedestrians from the I-495 shared use path along Lewinsville Road to Tysons and then to Reston and Gallows Road. Finally, the intersection at International Drive, Jones Branch Road, and Spring Hill Road is notorious for scoff law motorists using improper turn lanes and blocking crosswalks, endangering cyclists and pedestrians seeking to use paths and sidewalks in this area. VDOT and FCDOT should work with the Fairfax County Police Department to conduct regular enforcement actions to discourage improper behavior by motorists, pedestrians, and cyclists.</p>
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190606.03	6/6/2019	Individual	Email	<p>I live in Potomac Overlook, which can only be accessed via Georgetown Pike. The traffic situation going south on Georgetown Pike is intolerable during evening rush hours due to the commuter traffic, which is 90+% from Maryland. Having had to take emergency ambulances from our home to Fairfax Hospital on three different occasions, fortunately not in the past eight years, I have to question how any emergency rescue squad could get to Fairfax Hospital, or Arlington, Georgetown, GW, Alexandria, ect, in less than an hour, during evening rush hours. The expansion of the Beltway may have merit, but it will do nothing at all to address the immediate problem for those of us who must rely on Georgetown Pike to leave our homes. The primary beneficiaries of the expansion would, as with the earlier expansion of the beltway, be commuters from Maryland, and any long-term benefit would seem to depend on Maryland moving forward with their proposed Beltway/270 improvements, which are no where close to being approved. The Maryland side of the equation is in the early stages of the approval process, faces enormous opposition from citizen and environmental groups, and are at least 10 years from fruition assuming all approvals were in hand now. In my view, VDOT proposed an excellent short-term fix to the Georgetown Pike problem a year ago when they suggested closing access to the Northbound beltway during the evening rush hours. This would take the Maryland commuters off of Georgetown Pike, and while it would impact some Virginia residents who desire to go to Maryland during that period, it would be a very limited number, and for them it would be no worse than it already is. For those who need to access GW Parkway southbound during this period to go to DC, they would continue to have the option of going south on 193 and accessing GW Parkway at 123. This would be much faster than it is now without the current congestion on Georgetown Pike. This would also permit those who have children at Langley HS and Cooper to get to those schools for after-school events. The VDOT proposal also has the benefit of requiring modest expenditures, could be implemented on a trial basis, with experimentation of different time periods during evening rush hour so as to limit the effect when it is not needed. I know the challenges of those who have children in private schools in Maryland, as we recently finished 14 years of making the trek for our children, and the issue is always getting there during evening rush hour as the return home in the evening is never a problem. It is disturbing to see that so much money has been invested in Fairfax County over the past 10 years on road improvements which have mostly benefited residents of Maryland who commute to Virginia. At the same the resulting bottleneck at American Legion Bridge has made living in neighborhoods off of Georgetown Pike intolerable, and this has been reflected in the sharp drop in property values in the area. The earlier VDOT proposal would have an adverse effect</p>
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			on drivers who are almost entirely from Maryland, while providing critically needed relief for residents of McLean and Great Falls.
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190606.02	6/6/2019	Individual	Email	<p>If Beltway expansion is to move ahead, the critical question is one of timing. The Beltway traffic approaching the American Legion Bridge is already congested. The recent “shoulder” extension of toll lanes has aggravated the problem for Virginians attempting to drive to Maryland and northern parts of D.C. In response to that added congestion, I for one had to stop driving to morning classes at Johns Hopkins and others may have also had to curtail driving across the bridge.</p> <p>At the time of the May 20, 2019 public hearing, VDOT’s assumption was that Maryland would move ahead promptly to increase the capacity of the American Legion Bridge and connect it to new toll lanes on th Maryland side. The split vote of Maryland’s Board of Public Works on June 5, 2019, however, is inconsistent with the VDOT premise since work on the bridge and I-495 will be delayed until I-270 toll lanes are built. The most optimistic scenario appears to be a delay of at least two years in work on the bridge and Beltway.</p> <p>Any Virginia traffic analysis should address both before and after Maryland construction. Moreover, it is clear even now that any increase in Virginia traffic would only compound the very severe congestion problem on the Beltway. That should not be allowed to happen.</p> <p>If Virginia planning is to keep going, it will be necessary to establish a timing linkage the Maryland progress. Certainly, no construction should be allowed until there is made a firm and irrevocable commitment by Maryland to an opening date for its bridge and I-495 enlargements.</p>
190606.01	6/6/2019	Individual	Email	<p>What features of the preliminary concept plans and options of the I-495 NEXT study do you like?The special new connection to GWParkway. The extra lanes.What features of the preliminary concept plans and options of the I-495 NEXT study do you have concerns about?Until Maryland widens the bridge and itâ?Ts beltway, im concerned we are just moving the bottleneck to the edge of the bridge.Do you have any additional comments or suggestions regarding the information provided at the May 20, 2019 Public Information Meeting? Add on and off ramps to the new bridge at Old Dominion to spread out the load on Georgetown Pike.Additional comments, suggestions, or questions you have about the I-495 NEXT study. Redesign the intersection at Georgetown Pike, Balls Hill Road and the Beltway. Traffic flow from Georgetown Pike in both directions confronts and blocks traffic from Balls Hill road. A better pattern of lanes to join beltway traffic towards the river would smooth out and speed up flow. Now. Even when traffic lights are green these sources of cars block and</p>

			delay traffic in a big way. It's not just volume. It's chaos, blocking the box and awkward or illegal merges and joins.
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190605.01	6/5/2019	Individual	Email	<p>CITIZEN/COMMUNITY MEMBER COMMENTS ON VDOT I-495 EXPRESS LANES NORTHERN EXTENSION STUDY</p> <p>E-MAILED ON JUNE 5, 2019 PER JUNE 10, 2019 COMMENT DEADLINE</p> <p>Cc to John W. Faust, Board of Supervisors, Dranesville District (Dranesville@FairfaxCounty.gov)</p> <p>As residents of McLean for 20 years, we have seen traffic build to intolerable levels. This assessment is not limited to backups on Georgetown Pike and cut-through traffic on Holyrood Drive, although that immediate area is of most concern to us.</p> <p>Fairfax County mismanagement is in part to blame for getting priorities reversed: approving Tyson's Corner development first, and only then complaining that resulting traffic flow must be solved. The same blame can be leveled against the expansion of Langley High School, which now creates significant traffic congestion on Georgetown Pike during mornings and afternoons. Many students must travel many miles to get to Langley HS; another HS built in the Great Falls area would alleviate significant traffic congestion in addition to providing a more reasonable commute for students. Current VDOT plans should not continue to encourage these examples of mismanagement by Fairfax County.</p> <p>We are opposed to moving forward on current VDOT proposals for traffic flow onto the American Legion Bridge inner loop (--currently the "I-495 Express Lanes Northern Extension Study"). Any plan should be coordinated with Maryland, both for moving traffic more efficiently across the Bridge and for planning a much-needed new bridge upriver to alleviate American Legion Bridge traffic. Nevertheless, if plans must move forward, we would ask that the following considerations be incorporated into those plans before making them final:</p> <ul style="list-style-type: none"> <li>--Any flyover from northbound GW Parkway traffic should incorporate a road surface that silences tire noise. Current Beltway noise behind our residence on Holyrood at times is generated more from the concrete surface on the Bridge than from the Beltway at Georgetown Pike. Lowering preventable decibel levels, even if not required strictly by EPA guidelines, should be a community-focused goal within VDOT's general mission statement.</li> <li>--Any improved exit from the GW Parkway should include incentive for CIA employees to take the Parkway rather than opt for Georgetown Pike as their Beltway entrance. Perhaps a discounted EasyPass for these Maryland commuters that is part of the agreement with TransUrban would be in keeping with the Commonwealth's goal of improving overall traffic flow while having private enterprise foot the bill.</li> <li>--An upfront commitment by VDOT to work with the community to solve cut-through traffic if the new Northern Extension Project in fact does not sufficiently alleviate cut-through traffic.</li> </ul>
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			<p>A contingency trigger that would limit use of certain streets within certain hours to non-residents (as is the case in DC and Maryland neighborhoods) seems to be a fair tradeoff for moving forward with current VDOT plans and assurances.</p> <p>--Replace the existing Georgetown Pike Bridge with a structure in keeping with the Pike's historical byway status. Chain link fencing, and concrete rather than stone construction, would totally destroy the byway character of Georgetown Pike. Furthermore, a sidewalk and bike-path that do not, and never will, join other sidewalks/paths would be an irresponsible design. Certainly, we and a majority of our neighbors in the community who are impacted by the VDOT project want the bridge as compact as possible since we have no intention of going near the new Beltway on foot or bicycle with its increased noise and grit.</p> <p>--Provide adequate time (at least six weeks) and notice before any Fall Public Hearing of all matters that you propose to present at such Hearing, including final plans and NEPA Environment Assessment. Another Public Information meeting also seems reasonable. We and our neighbors did not receive adequate notice of the June 11, 2018 "Public Information Meeting #1" that your team pointed to at the May 20, 2019 meeting (that they presumptively labeled as "Meeting #2").</p> <p>Thank you for your consideration of our above-outlined concerns.</p>
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190604.01	6/4/2019	Individual	Email	<p>Dear Sir/Madam,I attended the public meeting held on May 20th at Cooper School in McLean, concerning the 495 express lane northern extension study. I provided (verbal) input at that meeting, and would like to expand on those comments here. I have lived in the neighborhood directly impacted by the proposed project since 1989, and understandably care deeply about this community. I would like to convey that I OPPOSE this study and the widening of the Beltway, for several reasons:The case for this widening was not adequately made at the meeting (or on the project website). There is a wide body of research detailing the impact of building new roads on traffic -- in fact, after an initial improvement, traffic returns to the same levels as before, for several well-documented reasons. The impact on parkland is disturbing. This will reduce the size of and integrity of Scott's Run, a very important and treasured resource in this community and beyond. It will also do the same to the National Historical Park on the east side of the bridge. Parkland is very scarce in our crowded area and we can't afford to lose any of it.At the meeting it was made clear that this study is separate from studies that may or may not be done in Maryland. How can Virginia go ahead without working closely with Maryland on this issue? Is this not one road that traverses two states?!At the 5/20 public meeting, I asked about the extent to which public opinion would be taken in to account when making the decision on this project. I mentioned the proposed study of closing the Georgetown Pike ramp on to 495 -- which I supported, but since the majority did not the project was shelved. I was told that the beltway widening project is different in that it is regional. This baffles me. The Georgetown Pike ramp closure project was presented (at an earlier public forum) as a way to cut traffic in the neighborhood but it was also explained in much more detail and with much more enthusiasm as a way to ease congestion on 495 approaching the bridge (estimates in change in throughput to the bridge, etc). So the response I received is unsatisfactory and a seems more than a bit disingenuous.At the 5/20 meeting it was announced that a contractor has already been selected for the project, and information was given on how they will proceed. This gives the distinct impression that this project is going forward no matter public opinion.In short, as a taxpayer and resident of this community I request that VDOT provides on its project website information detailing: Details on the analytic case for this project. How was this project selected as the best option? What research was conducted, what choices were considered? Why does VDOT think that this project will alleviate traffic for more than just a couple of years? How does VDOT refute the research indicating that more roads ultimately do not solve the traffic problem?Why VDOT wants to go forward without entering in to a joint plan and execution with Maryland DOT?How the loss of parkland and impact on the remaining</p>
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parkland will be mitigated. Will more parkland be purchased by VDOT to replace the parkland lost to this project? The process and extent to which the public's input will be factored in to the go-no go decision. An explanation of why a contractor was chosen and the details of that contract. What happens to compensation for the contractor if a decision is reached to not do the project? Thank you for your time. Please advise on when the answers to these questions will be posted on the project website.

190603.01	6/3/2019	Individual	Email	<p>Re meeting at Cooper School May 20, 2019 While I support hot lanes in the event the American Legion Bridge is expanded, the current efforts seem to be without a sound basis. It seems to many in the community that there is a rush to act without demonstrable benefit to the region and certainly not to the immediate community. 1. At no time have any VDOT representatives quantified the "utility" of constructing some or all of what is currently proposed at this time. I have requested specific data from both Abi Lerner and Rob Prunty only to be told that it would be provided later. It never has been. At the meeting I asked Rob directly and he said he would look up the information and give it to me during the Q&amp;A. I searched for him but he was nowhere to be found. My personal belief is that a compelling rationale cannot be demonstrated by the numbers. 2. Susan commented that this was a regional issue and not local. I would argue that as a regional issue, there would be significant disruption to Virginia traffic during this proposed 2020 start and then again in several years if Maryland caught up and started work. This would lengthen the total disruption period from 2-3 years to 4-7 years for the entire region. Given a marginal, if any, benefit for the immediate project, it just seems to be common sense to do it together if at all. 3. One of the major noise issues to be addressed in any time frame is the ability of the police to monitor and control traffic from Georgetown Pike to the Maryland side of the bridge. I am advised by the Maryland State Police that with the exception of felonies on this stretch that Maryland State Police are responsible. They further indicate, however, that because there are no areas to pull off that patrolling and enforcement is virtually non-existent. As a result there is excessive speeding which is not only dangerous but also contributes to the high pitched noise that results from what they describe as the "jock rockets". All designs should pay special heed to this need so that the eventual roadway, both HOV and non HOV are no longer a no man's land for enforcement. Maryland State Police should be included in the design criteria in as much as they have responsibility for enforcement</p>
190530.02	5/30/2019	Individual	Email	<p>They will nickle and dime us to death. Unless they start funding VDOT you can expect more of this. It is the only way they can get money. It's stupid.</p>
190530.01	5/30/2019	Individual	Email	<p>[Photo] This was taken Thursday @10:30 am. Maryland isn't going to change the bridge and one more lane just pushes McLean residents back further in the que. Please come to your senses and not greed and do not add another lane.</p>



190528.02	5/28/2019	Individual	Email	<p>Your recent meeting at Cooper Middle School was about letting Transurban extend their toll lanes on 495 in both directions to the American Legion bridge. I am dumbfounded as why the state would agree to generate this massive bottleneck at the entrance to the bridge. It's unbelievable this would be considered before the bridge is widened and Maryland has started their plans. Do you really want a massive jam at the entrance of the bridge? The cars in the public lanes will still need to cross and the cars from the toll lanes will dump out. Similar to the current problem that causes a back up, but now it will be pushed a few miles further down the road. Please let common sense prevail and hold off on this project until it can be tied in to Maryland's future toll road. Blaming the resulting traffic nightmare on Maryland won't work. What I've noticed when driving into Virginia from my morning doctors appointment is that the traffic jam starts on the Virginia side!</p>
190528.01	5/28/2019	Individual	Email	<p>What features of the preliminary concept plans and options of the I-495 NEXT study do you like?</p> <p>I recognize you have made an effort to minimize the taking of private property which is appreciated.</p> <p>What features of the preliminary concept plans and options of the I-495 NEXT study do you have concerns about?</p> <p>There is possible taking of private property next door to me at the end of Arbor Lane for storm drain or other purposes. I like my neighbors and neighborhood and this will negatively impact me. Also, a storm drain could be unsafe for children, attract mosquitos and generally diminish the neighborhood. Please make all efforts to locate this elsewhere. I am also concerned that moving the roadway closer to the wall will increase noise and air pollution at my property. I have young children and this will decrease our quality of life as well as possibly negatively impact our health. Finally, even if our property is not taken, there will be a significant diminution in our property value with the addition of the storm drain next door and closer proximity to the beltway as well as higher associated noise and air pollution. I feel this will create a cloud over my title for years to come with no just compensation. I also am not pleased about the new path that will run along the wall. We live in a private community with very little pedestrian or vehicular traffic. Adding a pedestrian path will bring random strangers into our neighbor right by our property, which will diminish privacy and possibly increase crime.</p> <p>Do you have any additional comments or suggestions regarding the information provided at the May 20, 2019 Public Information Meeting?</p> <p>Additional comments, suggestions, or questions you have about the I-495 NEXT study.</p>

			<p>Children and families live in this area. VDOT is negatively impacting our quality of home life and environment. VDOT is also significantly diminishing our property values significantly without any just compensation. These HOT lanes are not improving anything for the greater good without continuation of additional lanes over the bridge and into MD. Nothing should be done without a full scale and coordinated effort with MD.</p>
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190527.01	5/27/2019	Individual	Email	<p>A decision to extend the existing toll lanes (hot lanes) from Virginia into Maryland (inner beltway loop) and vice versa (outer loop) has left me perplexed. I have lived at the same location near where the beltway crosses Georgetown Pike for 46 years and believe I have a good understanding of the traffic problems in that area, so therefore wish to express my opinion. Over the past few years traffic backups in Virginia to the American Legion Bridge have occurred most afternoons and evenings starting as far back as Route 7 (frequently further if there are accidents). Commuters clog Georgetown Pike and adjoining neighborhood roads in order to bypass portions of the backups. While the proposed hot lane extensions would be done using private funding, in the long run it boils down to more tolls and taxes (tax money currently for planning stage). Extending inner loop hot lanes in Virginia without complementary action from Maryland will have no effect on the overall traffic as the bridge is the choke point. The inner loop beltway portion nearing the I-270 split also tends to back up as that is another choke point. Extending the hot lanes on the inner loop in Virginia before adding lanes on the bridge will just spread the backups over more lanes which in turn will increase the number of accidents at the merge points as the traffic funnels down causing even more backups. It will neither get more cars across the river in a given amount of time nor will it alleviate commuters from traversing neighborhoods. Coming the other direction into Virginia on the outer loop, there are no backups between the bridge and the start of the existing hot lanes, therefore no reason for hot lane extensions there (even if and when outer loop bridge lanes are added). Virginia should take no action until Maryland adds lanes to the bridge. The correct solution to the inner loop backup problem is adding more lanes from the George Washington Parkway to across the bridge and to resolve the I-270 split choke point. This would eliminate backups, reduce the number of accidents, save many thousands of commuter hours, reduce carbon emissions, and lessen driver and neighborhood frustrations. Additional lanes on the inner loop in Virginia between the George Washington Parkway and the current hot lanes would not be necessary for many years. My conclusion is that in Virginia there is no need to extend hot lanes, no need to replace several overpasses, and no need to impact those home owners adjacent to the beltway by taking their property. In Maryland only the American Legion Bridge needs more lanes on both sides (primarily on the inner loop), and the inner loop choke point at the I-270 split needs to be resolved.</p>
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190526.01	5/26/2019	Individual	Email	<p>We support the extension. We favor the trail along the outside of the sound wall. If the sound wall is moved, we would like to see it placed on a built up (higher) berm so that the overall height of the sound wall is increased. Most importantly, we support a completed trail from Saigon Road to and across the beltway bridge along Georgetown Pike. Parts of the trail are already in place. Fairfax County has a trail easement across the Fitzgerald property. We ask that VDOT make room for the remainder of the trail across other properties needed to complete the trail along Georgetown Pike and across the beltway bridge as part of this project..</p>
190523.02	5/23/2019	Individual	Email	<p>I attended the meeting May 20 at Cooper Middle School. Thank you for the update.</p> <p>Next time, could you please provide participants with 3x5 cards and ask them to write their questions and comments. This would be a much more effective use of participants' time.</p> <p>Or have a Q and A session with the 3 by 5 cards, then followed afterwards by a public comment period.</p> <p>I am very concerned that the engineer modeling of long-term impact does not consider, in particular, major arteries such as Great Falls Street, Westmoreland Street, Magarity Avenue, Kirby, Route 7 through Falls Church, etc. These streets are impacted negatively now, and will be worse over the next few years as Tysons grows. I found the modeling results, as presented, unpersuasive at best.</p> <p>I also wish there had been a discussion of alternative transportation options being considered, such as Bus Rapid Transit.</p> <p>Next meeting, please have someone who can represent Maryland's, WMATA's, (and perhaps the Federal Government's) stakes in this development, and what they are doing about it?</p> <p>Lastly, the economic axis of the DC Metro area is, for the foreseeable future, Bethesda-Chevy Chase, across the ALB, then East to Rosslyn along the I-66 corridor, and out I66 and the Toll Road to Leesburg. Metro Center is not the real center any more. Is it possible to say all of this at the opening of any presentation, to show that VDOT is fully aware of the regional challenges/context that it is part of.</p> <p>Thanks for reading this</p>



190523.01	5/23/2019	Individual	Email	<p>Would someone please explain to me why it would be so difficult to install a flashing light, at the top of the hill before the Georgetown Pike/Douglass intersection, warning drivers that cars may be stopped/turning ahead??? There is currently a flashing light right before the Georgetown Pike/Swinks Mill blind curve/intersection warning cars that there may be STOPPED cars ahead. After years of accidents at this location, finally a warning light was installed.Why would such common sense change take a mountain to move a mole hill? Informing drivers of any danger ahead is being pro-active. Why wouldn't this be done?Bigger/safer changes are needed at this intersection to make it safe for drivers and pedestrians, but why wouldn't you make these smaller changes in the meantime?? If the addition of a flashing, warning light saves an accident from happening (or... human life) why wouldn't we do it???Reducing the speed limit and placing an officer there every once in a while, to give out tickets to speeders, WILL slow traffic down. It worked on the 123 stretch of road between Lewinsville and Old Dominion, heading toward downtown McLean. Cars have slowed down because they never know when an officer is going to be hiding out in the side street, with their radar gun. I would certainly think that the money generated from these tickets would subsidize the police offices salary.Stephen Birch (VDOT'S current fearless leader) successfully led and managed many projects and studies during his tenure with VDOT. He was instrumental in developing various policy directives for VDOT's traffic engineering and transportation system management and operations – as said so eloquently on the VDOT website. I sure hope that he is hiring and fostering leaders that are competent in determining dangerous road situations and then these leaders have the intelligence and ability to make necessary change happen. I am not getting that sense... between the Hot Lane debacle, thinking that 5 lanes funneling down to 3 at the American Legion Bridge wasn't going to create gridlock to now this inability for common sense (simple) additions to dangerous intersections (which by the way these intersections were created MORE dangerous because of the Hot Lane debacle) I question VDOT'S leadership and ability to make the future decisions necessary to make Virginia's road system less dangerous, efficient and effective.Please do the right thing, anything, before something "really" bad happens at this intersection of Georgetown Pike and Douglass Drive in McLean.</p> <p>Thanks for your time and energy.</p>
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190522.05	5/22/2019	Individual	Email	<p>What features of the preliminary concept plans and options of the I-495 NEXT study do you like?</p> <p>I like the possibility that congestion in the area may eventually be relieved. I am glad there are no plans to relocate residents.</p> <p>What features of the preliminary concept plans and options of the I-495 NEXT study do you have concerns about?</p> <p>I am concerned that without action by Maryland, the bottleneck will only get worse. I am also concerned that there will be an unsightly feature placed on our land, such as a storm pond. I am hoping that if storm ponds or other features are placed on private property, the homeowners will be compensated appropriately to make up for lost property value. It would also be appreciated if VDOT worked with residents on aesthetic considerations, such as trees in front of new walls or plants around any storm ponds. The preliminary plans further included a bike/pedestrian path alongside or possibly on our property. If this moves forward, I would like to be involved to ensure the safety and privacy of my family.</p> <p>Do you have any additional comments or suggestions regarding the information provided at the May 20, 2019 Public Information Meeting?</p> <p>Additional comments, suggestions, or questions you have about the I-495 NEXT study.</p> <p>Can local residents see a copy of the next version of the design plan before the next public hearing?</p>
190522.04	5/22/2019	Individual	Email	<p>I saw on your web site at <a href="http://www.495northernextension.org/public_meetings/default.asp">http://www.495northernextension.org/public_meetings/default.asp</a> that there was a public meeting on May 20 at Cooper Middle School about the 495 extension. Unfortunately I was not able to attend that meeting but am submitting these written comments to you by June 10, 2019. I am supportive of continued efforts to fully integrate bicycle and pedestrian facilities into the overall project scope. This would include coordinating with FC DOT and being consistent with the FC bike plan. These need to include multiple options for non-motorized and safe/accessible ways for people to get from one side of the beltway to the other, and to be able to safely connect with the existing trail network. Also, for additional trails along that 495 corridor that keep bicycles and pedestrians behind sound barriers. As a regular bicycle commuter, I am excited about the possibility of VDOT, working together with FC, to make significant and substantial improvements for non-motorized and safe/accessible bicycling/pedestrian facilities in the 495 area.</p>

190522.03	5/22/2019	Individual		What features of the preliminary concept plans and options of the I-495 Northern Extension study do you like? STOP ALL BELTWAY EXPANSION. What features of the preliminary concept plans and options of the I-495 Northern Extension study do you have concerns about? DO NOT ADD 4 LANES. Do you have any additional comments or suggestions regarding the information provided at the May 20, 2019 Public Information Meeting? DO NOT STEAL PARK LAND.
190522.02	5/22/2019	Individual		What features of the preliminary concept plans and options of the I-495 Northern Extension study do you like? Stop all expansion plans on the beltway from Georgetown Pike to the American Legion Bridge! What features of the preliminary concept plans and options of the I-495 Northern Extension study do you have concerns about? Do not add 4 lanes! Do you have any additional comments or suggestions regarding the information provided at the May 20, 2019 Public Information Meeting? Do not confiscate National Park land!
190522.01	5/22/2019	Individual		What features of the preliminary concept plans and options of the I-495 Northern Extension study do you like? None. What features of the preliminary concept plans and options of the I-495 Northern Extension study do you have concerns about? 1) I object to adding 4 lanes, which will increase gridlock. 2) I object to adding pedestrian & bike paths. Do you have any additional comments or suggestions regarding the information provided at the May 20, 2019 Public Information Meeting? Do not take park land.
190521.06	5/21/2019	Individual	Email	Sorry I didn't get a chance to attend the mtg on 5/20- How will the 6 lanes (2 express/4 general?) merge onto the 4-lane bridge itself?
190521.05	5/21/2019	Individual	Email	Please be sure to include biking and walking, multi-use trails as part of this project to include much-needed connections for the region's multi-use trail network. I am a regular user of the C&O towpath, and some forward thinking on connections across the river can only benefit all. Thanks for your consideration,
190521.04	5/21/2019	Individual	Email	STOP Beltway expansion past Georgetown Pike to American Legion Bridge ! Do NOT add 4 lanes. Do NOT confiscate National Park land !

190521.03	5/21/2019	Individual	Email	<p>What features of the preliminary concept plans and options of the I-495 NEXT study do you like?The fact that it will ease traffic. I also like the urgency of the plan.What features of the preliminary concept plans and options of the I-495 NEXT study do you have concerns about?The fact that MDOT is so far behind. Most of the traffic is on the Maryland side. What is the holdup and why cant they be completed in conjunction with one another.Do you have any additional comments or suggestions regarding the information provided at the May 20, 2019 Public Information Meeting? What will be done to manage the additional bottle necks caused by the construction and Maryland delay?Additional comments, suggestions, or questions you have about the I-495 NEXT study. Thanks for asking and making this website available.</p>
190521.02	5/21/2019	Individual	Email	<p>It is the worst project I have ever seen without the expansion of the bridge the grid lock will be worst 9 lane going to 4 lane bridge</p>
190521.01	5/21/2019	Individual	Email	<p>I have been a resident of McLean for 20 years and support the project--assuming Maryland rebuilds the bridge and widens its section of the beltway northwards accordingly. I am pleased that the design includes a shared use path. Such paths increase the quality of life in the neighborhoods they reach, and offer people a way to safely walk and bike to schools, work, and stores. Such activities, in turn, can reduce the number of vehicles on the road and accompanying pollution, and improve health outcomes. The inclusion of a shared use path is a once-in-a-generation opportunity to connect existing bike/pedestrian infrastructure in our region. Too often in Northern Virginia, shared use paths and bike lanes on streets start and stop after a short while without connecting to anything else. Unless users feel that they can safely walk or bike from point A to point B, they will not use these facilities. I strongly encourage VDOT and Transurban to commit to having a shared use path along the entire length of the project, and providing safe connections to the Tysons area. Maryland, for its part, should ensure that the continuation of the path north connects with the C&amp;O canal towpath and MacArthur Blvd, two busy routes for bike commuters, recreational cyclists, walkers, and runners. Otherwise, the only other possibility for cyclists and pedestrians to move between that part of Northern Virginia and that part of Montgomery County is to use Chain Bridge, which on the Virginia side does not connect to a safe route to major destinations in Arlington or McLean/Tysons. The inclusion of shared use paths on I-66 (long time inside the beltway and now outside the beltway), on the new Woodrow Wilson Bridge, and on the new Douglass bridge across the Anacostia all share the same goal of accommodating more than just vehicles and connecting the existing bike/ped infrastructure of our region. I strongly hope that will be the case with the 495 project.</p>



190520.14	5/20/2019	Individual	Email	<p>1. I attended the meeting at Cooper M.S. tonight. I support the simple fix idea that a questioner brought up of widening Balls Hill Road at the 193 intersection and adding a right turn lane from NB Balls Hill road onto 193E in front of Cooper Middle School. It is an unsafe situation for those trying to exit Cooper's parking lot in the afternoon when there is gridlock caused by cars trying to access the ramp onto 495N. Recently it took me 20 minutes to wait through multiple light cycles to be able to turn right onto 193. 2. On the north side of the intersection of Balls Hill Road with 193, coming out of the Langley Forest neighborhood, please install a "no right turn on red" sign. Drivers coming out of the Langley Forest neighborhood currently turn right on red and block the box. They create additional gridlock by continuing to turn right onto 193W at the same time as those driving W on 193 are trying to move through that intersection, either onto the 495N ramp or straight ahead on 193. That also prevents cars on Balls Hill in front of Cooper from reaching 193. 3. I asked this question at the meeting because no one had talked about it--what will be the impact on traffic and noise on the GW Parkway with the added express ramps from 495 and without them? Will there be a possibility of sound walls for those residents who back up to the GW Parkway in neighborhoods like mine (Langley Oaks)--specifically Jill Court? 4. Will the access point onto the southbound express lanes on the outer loop of 495 remain the same, for those entering 495 at 193, or will it be moved? (I like it where it is). Thank you.</p>
190520.13		Individual		<p>What features of the preliminary concept plans and options of the I-495 Northern Extension study do you like? I like the additional lanes from Tyson's Corner into Maryland. I believe the extra exit at George Washington Parkway might confuse drivers. I really like the additional paths for biking and walking. I like the walls, too. What features of the preliminary concept plans and options of the I-495 Northern Extension study do you have concerns about? I am concerned about the additional exit at George Washington Parkway as it might confuse drivers. Do you have any additional comments or suggestions regarding the information provided at the May 20, 2019 Public Information Meeting? Thank you for setting up the maps in the back of the room. They really helped me understand what VDOT was proposing.</p>

190520.12	5/20/2019	Individual	<p>What features of the preliminary concept plans and options of the I-495 Northern Extension study do you like? Without a guarantee (\$, community approval, schedule, contract, etc) on the MD side, there is nothing about this project that can be liked at this time.</p> <p>Congestion/bottleneck is being moved forward to a location less suited to handle it. What features of the preliminary concept plans and options of the I-495 Northern Extension study do you have concerns about? Environmental Impact, noise</p> <p>Design 495 S to 267 for regular traffic.</p> <p>Focus here &amp; not on today's issues like back up around the Route 7 &amp; 123 exits on/off the highway. Do you have any additional comments or suggestions regarding the information provided at the May 20, 2019 Public Information Meeting? More community meetings than mentioned are needed.</p> <p>VDOT needs to support their studies - prove prior estimates as a starting point.</p>
190520.11	5/20/2019	Individual	<p>What features of the preliminary concept plans and options of the I-495 Northern Extension study do you like? Having the shared use path included is greatly appreciated. This mode of transportation needs to be safe and have lighting as it will be used 24/7. What features of the preliminary concept plans and options of the I-495 Northern Extension study do you have concerns about? The shared use path needs to connect with the Scotts Run Nature Preserve and the Potomac Heritage National Scenic Trail and the future connection of the American Legion Bridge and Maryland future bicycle trails. Good planning is needed so the public park access is easy &amp; safe. The NEPA laws need to be followed and everyone can win. Do you have any additional comments or suggestions regarding the information provided at the May 20, 2019 Public Information Meeting? Glad to see drawing were added the day after the meeting. I hope the maps &amp; documents at the next fall meeting will be posted 10 days before the event so the public can review them before the meeting/hearing. Additional comments, suggestions, or questions you have about the I-495 NEXT study. VDOT and others may need to fund some of the shared use path costs to make this project viable. Hold the OP3 vendor responsible for ped/bike improvements in sections where they are making improvements. Crossings for bicyclists over or at access ramp to toll lanes must BE SAFE!</p>
190520.10	5/20/2019	Individual	<p>Do you have any additional comments or suggestions regarding the information provided at the May 20, 2019 Public Information Meeting? 1) VA should buy the bridge &amp; land from MD 2) Even if they don't build a new bridge let the 2 lanes extend over bridge &amp; force outer lanes into the 2 lanes leftover.</p>
190520.09	5/20/2019	Individual	<p>What features of the preliminary concept plans and options of the I-495 Northern Extension study do you have concerns about? Improve traffic from EB 193 to NB 495 with a separate</p>

				ramp.
190520.08	5/20/2019	Individual		What features of the preliminary concept plans and options of the I-495 Northern Extension study do you like? Unquestionably there is a bottleneck on the beltway where the express lanes, 267, Dulles Toll Road & GW Parkway traffic merge. Even w/o an expansion of the bridge & express lanes by Maryland, the extension of the express lanes will move the bottleneck closer to the Md. state line & farther from residential communities. What features of the preliminary concept plans and options of the I-495 Northern Extension study do you have concerns about? Live Oak Drive & Balls Hill Road becoming a through street seems counterproductive & harmful to McLean communities & could add more traffic to Georgetown Pike & more congestion to the 495/193 intersection. Do you have any additional comments or suggestions regarding the information provided at the May 20, 2019 Public Information Meeting? Long term - need MD, DC & Nat'l Park Service to widen Clara Barton & create through road from Md down the river to DC similar to the GW Pkwy. Also short term - need to install "local traffic only" signs on side roads to prevent/curtail cut throughs, & have police enforce it.
190520.07	5/20/2019	Individual		What features of the preliminary concept plans and options of the I-495 Northern Extension study do you like? Can you post the affected "Right of Way" may be affected by the project? Identify the length of "ROW" will be affected by this project. What features of the preliminary concept plans and options of the I-495 Northern Extension study do you have concerns about? Exit 45 & 43 exists south bound needs to looking at it.
190520.06	5/20/2019	Individual		What features of the preliminary concept plans and options of the I-495 Northern Extension study do you like? The feature that says "Do Nothing." These toll roads profit by increasing congestion and will always need a fix where they end. As will 66 OTB VA is selling taxpayer funded roads to foreign investors. Time for VDOT to build our roads and if tolls are needed, VA can collect and give back to taxpayers through other road improvements. What features of the preliminary concept plans and options of the I-495 Northern Extension study do you have concerns about? The scheme that HOT Lanes decrease congestion. Do not continue this sham especially do nothing until MD has a plan. Shoulder lanes have further congested the bridge with 6-7 lane funnel to 4 bridge lane. Ticket Red X w/camera. Do you have any additional comments or suggestions regarding the information provided at the May 20, 2019 Public Information Meeting? Do nothing until MD widens the ALB then reassess. Put your plans away and wait for MD. Get per car revenue from Transurban -- not upfront cash! Fix the 75 year windfall they are getting before extending it. NO MORE PRIVATE PARTNERS.

190520.05	5/20/2019	Individual		<p>What features of the preliminary concept plans and options of the I-495 Northern Extension study do you like? NONE. What features of the preliminary concept plans and options of the I-495 Northern Extension study do you have concerns about? Bridge widening &amp; HOT Lanes. Do you have any additional comments or suggestions regarding the information provided at the May 20, 2019 Public Information Meeting? Please widen bridge but not 2 HOT lanes. Do not widen bridge if not widened on Maryland side.</p>
190520.04	5/20/2019	Individual		<p>What features of the preliminary concept plans and options of the I-495 Northern Extension study do you like? That traffic on Georgetown Pike will be better &amp; less people will use it to cut through. What features of the preliminary concept plans and options of the I-495 Northern Extension study do you have concerns about? Can you finish it by 2022! Do you have any additional comments or suggestions regarding the information provided at the May 20, 2019 Public Information Meeting? Why not make a new bridge/tunnel near Great Falls or Sterling?</p>
190520.03	5/20/2019	Individual	Email	<p>What features of the preliminary concept plans and options of the I-495 NEXT study do you like?</p> <p>I live right off Georgetown Pike about 0.75 miles west of the Beltway interchange at exit 45. I like that the approaches to the interchange will be widened and that there will be a dedicated through lane for eastbound traffic on Georgetown Pike over the Beltway. Being a bit selfish, I am also pleased there will not be an HOV-3 exit at our exit.</p> <p>What features of the preliminary concept plans and options of the I-495 NEXT study do you have concerns about?</p> <p>In light of the issues that were presented last year at the study on closing the entrance from 193 to northbound 495 during rush hour, I hope there can truly be a dedicated lane for thru traffic. As a resident who often has to get to my kids' school on the other (east) side of the Beltway, I am often stuck with Maryland commuters who are trying to get to the front of the line to access 495.</p> <p>Do you have any additional comments or suggestions regarding the information provided at the May 20, 2019 Public Information Meeting?</p> <p>The concepts of the "2045 Build / No Build" assumptions were rather arcane as there were multiple potential assumptions that were being made, so it was difficult to digest the Mr Lerner did not seem to understand this confusion on the part of attendees. He used these in his presentation about potential time and congestion projections, yet it was not clear that the "No Build" assumptions were real (for example, part of the NO Build scenario includes the assumption that Maryland will expand the Legion Bridge and build its additional lanes. I spoke</p>



				<p>with some MDOT officials at the meeting and those plans are still far from concrete)  Additional comments, suggestions, or questions you have about the I-495 NEXT study.  As a local resident who is greatly impacted by worsening congestion, I hope that VDOT and MDOT can coordinate their efforts. This is a region-wide problem and solving it piecemeal just creates a chain of headaches and delays. Of course the realities of local politics present difficulties, but if there is one project that all public officials should be able to agree on, transportation is a no-brainer.</p>
190520.02	5/20/2019	Individual	Email	<p>Hello- Could I please get a copy of the posters and presentation from tonight's meeting?Thank you,</p>

190520.01	5/20/2019	Individual	Email	<p>I am unable to attend tonight's community meeting in McLean regarding a 3 mile extension of the I-495 Express Lanes from the Dulles Toll Road to the American Legion Bridge, but hope the following questions will be addressed at the meeting and in your reply to this email:</p> <p>(1) Won't the plan to extend the EZ Pass lanes in Virginia simply move the traffic choke point to the American Legion Bridge, thereby enlarging the size of the virtual parking lot that exists on I-495 during peak traffic hours?</p> <p>(2) Has Maryland made a firm commitment to an Express Lane extension on its side of the Potomac that will link up with the Virginia Express Lane extension? How is the Virginia Plan coordinated with Maryland's work and design schedules?</p> <p>(3) Will the Express Lane extension reduce the number of toll free lanes between the Dulles Toll Road and the American Legion Bridge? Will we end up with more Express Lanes than toll-free lanes on I-495?</p> <p>(4) How does the Express Lane extension help to alleviate the already serious and constantly increasing flow of cut-through traffic on McLean's residential streets?</p> <p>(5) How does VDOT protect us against price gouging by the EZ Pass contractor, Transurban? Are there any restraints on the toll rates established and charged by Transurban? What oversight and control does VDOT exercise over Transurban?</p>
190516.01	5/16/2019	Individual	Email	<p>Would you please tell me whether May 20, 2019 Cooper Middle School meeting is a discussion of the ongoing environmental study or a discussion of the results? From the last meeting, I understood that the study was expected to be complete by mid 2019, but the online information regarding this meeting suggest that the study is not yet complete.</p>
190509.02	5/9/2019	Individual	Email	<p>Great idea to have six lanes, four general purpose and two express lanes, from Dulles Access to American Legion Bridge. Has anyone thought of the increased bottleneck as these six, and the G W Parkway meet the four lanes crossing the bridge? You need to get your heads out of the public / private partnership sand and work successfully with Maryland to correct the nightmare, which is actually an all-daymare, this bridge causes all Virginia taxpayers.</p>

190509.01	5/9/2019	Individual	Email	Dear VDOT:For the 495 Northern Extension, has VDOT considered the idea having the left lanes of northbound and southbound 495 on the last curve before the American Legion Bridge overlap each other? For example, on the Clara Barton Parkway in Glen Echo, MD the westbound side of the road is elevated so the left westbound lane is above the left eastbound lane. (Please see the link to Google Maps Street View). I know that many in McLean are worried that the Extension will significantly widen the amount of right-of-way needed for 495. I share that concern. But even when 495 is not congested, traffic on the Inner Loop between the GW Parkway off-ramp and the American Legion Bridge seems to slow because people can't see around the corner and naturally slow down. If people on the Inner Loop could see whether or not people are stopped on the bridge, they wouldn't needlessly be hitting the brakes when the reach that last curve.
190506.01	5/6/2019	Individual	Email	Greetings, I own a home near the environmental study area of the proposed 495 Northern Extension. I learned about the extension today by receiving a letter in the mail. I am not able to attend the meeting on May 20th, so I'd like to submit my questions here. It looks like the dotted line of the Northern Extension Study area cuts through many existing homes and neighborhoods. I feel concerned that home owners will either lose their homes or suffer decreased property values as a result of the proposed changes. Will any homes be impacted by the proposed changes? If so, how will home owners be compensated?

190506.01	5/6/2019	Individual	Email	<p>Please consider the following comments regarding the I-495 &amp; I-270 Managed Lanes Project:  Recommend scaling back the project to the segments below:</p> <p>I-495 between from George Washington Parkway in Virginia to I-270 Spur</p> <ul style="list-style-type: none"> <li>· Recommended Lane Configuration (2 Express Lanes, 4 General Purpose Lanes, and 1 Auxiliary Lane between access points in each direction, 14' Shoulders). Similar to current I-495 configuration in Fairfax County.</li> </ul> <p>I-270 from I-495 Spur to I-370</p> <ul style="list-style-type: none"> <li>· Recommended Lane Configuration (2 Express Lanes, 4 General Purpose Lanes, and 1 Auxiliary Lane between access points in each direction, 14' Shoulders). Remove Local C/D Lanes. Similar to Future I-66 OTB configuration in Fairfax County.</li> <li>· Do not recommend Reversible lanes on I-270 in Montgomery County due to long term population growth. I-270 should be compared to the future I-66 express lanes in Virginia and not the current I-95 express lanes in Virginia.</li> <li>· Construct Median Highway Bus Rapid Transit Station (Similar to I-35W &amp; 46th Street Station in Minneapolis , MN – Attached) to add additional transit infrastructure along the corridor with <ul style="list-style-type: none"> <li>o At Montgomery Mall</li> <li>o At/Near Wootton Pkwy or Montrose Road (Near Preserve Parkway)</li> <li>o At Planned Corridor Cities Transitway crossing of I-270/Shade Grove Rd</li> </ul> </li> <li>· Considerations should be made for future improvements to I-270 between I-370 and Frederick. (especially in the Northbound direction) <ul style="list-style-type: none"> <li>o I-370 Spur to Clarksburg (2 Express Lanes, 3 General Purpose Lanes, and 1 Auxiliary Lane in each direction). Remove Local C/D Lanes. - 216' ROW</li> <li>o Median Highway Bus Rapid Transit Station near Metropolitan Grove MARC Station (Shift MARC Station closer to I-270)</li> <li>o Clarksburg to Frederick (2 Reversible Express Lanes; 3 GP in each direction). - 144' ROW</li> </ul> </li> </ul> <p>Additional Comments:</p> <ul style="list-style-type: none"> <li>· Project messaging should be similar to the I-66 Outside the Beltway multi-modal express lane project (Attached)</li> <li>· Develop Transit Service Plan between Virginia and Maryland (Attached)</li> <li>· All Manage lanes should be free to HOV users with three people.</li> <li>· Additional Park and Ride Lots need to be developed/expanded along I-270 corridor</li> <li>· Brunswick MARC service improvements need to aligned with upgrades to I-270</li> <li>· HOV-3 use the Intercounty Connector (ICC) for free with an E-ZPass Flex set to HOV</li> </ul>
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mode.

- Develop strategies to shift traffic from I-495 between I-270 and I-95 to the ICC.
- Considerations should be made for a ped/bicycle crossing of the American Legion Bridge.

Interactive Map of Recommendations: [goo.gl/hdtCt4](https://goo.gl/hdtCt4)

Virginia Resident

190502.01	5/2/2019	Individual	Email	<p>Good morning, I'm hoping to get a bit more information on the focus of the May 20 public meeting and comment period announced yesterday on the I-495 NEXT study. The email below indicates the meeting will be on VDOT's environmental study of the project, but it sounds from the 495 NEXT webpage like work on the Environmental Assessment is still underway, and that it won't be made available for review and comment until a future meeting. Is that correct? If so, what type of new information will be available at the meeting that wasn't available for the June 11, 2018 meeting? And will that new information be posted on the project webpage before the June 10, 2019 due date for written comments? Thank you for any additional information you can provide, and please feel free to call me at the number below if it would be easier to reply over the phone.</p>
190501.02	5/1/2019	Individual	Email	<p>Hi VDOT, Anyone living in the 495 traffic mess in McLean knows that the American Legion bridge is too small to handle the 6 lanes on either side of it. The bridge on Georgetown Pike giving access to 495 in a road block now from 4 -7 in both directions. The problem is NOT the fast lanes. The problem is the bridge!</p> <p>How about PROACTIVELY working with Maryland to make it wide? Or add another crossing? THEN and only then, would you be solving traffic issues.</p>
190501.01	5/1/2019	Individual	Email	<p>If VDOT doesn't assist Maryland in widening the American Legion Bridge, they will only block all lanes near Georgetown Pike. The exit will become a parking lot. The bridge on Georgetown Pike blocks up so that people entering 495 block local residents -ME! Georgetown Pike will become unusable! I commute to Maryland for work - you're killing me.</p> <p>Please study the traffic on multiple days Mon - Fri from 4 -7! It's awful already.</p>

ATTACHMENT C

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VIRGINIA DEPARTMENT OF TRANSPORTATION

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I-495 EXPRESS LANES  
NORTHERN EXTENSION STUDY

Monday, May 20, 2019  
Cooper Middle School  
977 Balls Hill Road  
McLean, Virginia 22101  
6:30 p.m.

RUDIGER, GREEN & KERNS REPORTING SERVICE  
CERTIFIED VERBATIM REPORTERS  
4116 LEONARD DRIVE  
FAIRFAX, VIRGINIA 22030  
(703) 591-3136

PRESENT

**ABI LERNER, PE**

Associate Manager of Special Project Development  
Virginia Department of Transportation

**KEN CONNORS**

Project Manager  
Virginia Department of Transportation

**SUSAN SHAW, PE**

Director of Megaprojects  
Virginia Department of Transportation

**AMANDA BAXTER**

Kimley-Horn



P R O C E E D I N G S

(Presentation not take per VDOT)

MR. CONNORS: So, ways to submit your questions and comments for tonight, of course you can submit a comment in person tonight, we have a comment form either by in person, you can mail it in or you can email it to us or go through the website and submit it that way.

All comments need to be received by June 10th to be included in the official summary that will summarize tonight's meeting and comments.

So, with that at this time, I think the moment everyone's been waiting for, I would like to introduce Ms. Susan Shaw. Ms. Shaw is the VDOT Northern Virginia Megaprojects Director and she is here, along with the rest of the VDOT team, to answer any questions you may have.

So, I believe we are lining up here by the microphone. (Indicating)

MS. SHAW: Yeah, and what you weren't waiting for is to hear me but to be able to ask your questions. I did want to just lay some ground rules a little bit tonight.

I just ask you to be cognizant of your neighbors and friends that are here. This is an

1 opportunity for you to ask questions, it's not really set  
2 up as a comment forum but more for you to ask questions.  
3 We've got a team of people up here that may come up and  
4 help answer some of those questions.

5 We don't have a clock sitting here timing  
6 people, so we're going to trust that you'll keep your  
7 questions succinct and we're also going to try to keep our  
8 answers fairly short just so that we can have time to do  
9 this.

10 And I think what we'll plan to do is go until  
11 about 8:15 or so because I do want to have people have the  
12 opportunity to go back and talk to our team that are back  
13 at the boards.

14 Before we start I just wanted to mention a  
15 couple of other elected officials that are here. I know  
16 Supervisor Foust is here somewhere in the back, I see  
17 waving his hand. And we also have representatives for  
18 Senator Boysko that's here. Do I see a hand up? That's  
19 kind of hard to judge. And a representative for Delegate  
20 Murphy is also here.

21 So, thank you all for being there and with  
22 that we will start. And I am going to ask that you just  
23 keep to one question and then you can go to the back of

1 the line. As we have time, we'll allow second questions.

2 MS. NAWAZ: Hi, my name is Kathleen Nawaz.  
3 I've lived in this neighborhood since 1989. And, you  
4 know, obviously as many of us here are, I'm very concerned  
5 about this project and my one question, since I'm limited  
6 to one and not allowed to make a comment, is to what  
7 extent will you take into account the questions, the  
8 comments and perhaps the dissatisfaction of people who  
9 live in this area in making the decision to go or no-go  
10 for this plan?

11 You know, you I'm sure recall a few months ago  
12 when there was the discussion and debate about potentially  
13 closing the Georgetown Pike access ramp onto 495 and  
14 through the public comment process the decision was  
15 reached to not go that route, and so my question for you  
16 is, does the same hold here?

17 It seems like this one is further along in  
18 terms of the planning and the design, the analysis. So to  
19 what extent do we actually have a say in the decisions?

20 MS. SHAW: So, first I would say very --  
21 (Audience applause)

22 So two very different types of projects. One  
23 was really a transportation solution for a neighborhood

1 problem where there was a neighborhood cut-through  
2 traffic, this project is a regional transportation  
3 project. And so we will consider local input, we will  
4 consider comments and concerns from direct impact  
5 communities but we will also consider what the  
6 transportation improvements are for the region.

7 So that's one of the things that was very  
8 different about the two approaches.

9 If we only ever allowed direct impact  
10 communities to decide whether we ever provided a regional  
11 transportation project I can tell you we would probably  
12 not provide any. So that's just the reality of it.

13 Now, we are going to look at the traffic  
14 benefits. If they're not there, you know, we don't have a  
15 project. We need to meet our purpose and need. We need  
16 to look at what the project benefits are. Those three  
17 things, goals and objections that Abi talked about, we're  
18 going to look at all of that data.

19 We're also going to weigh the impacts to the  
20 natural and other environmental, you know, resources in  
21 the project area that are impacted by the project and we  
22 weigh all of that together to make a decision.

23 MS. NAWAZ: That is helpful to know. I would



1 also say that I'm really glad to know that you're actually  
2 going to do the analysis because of course in  
3 transportation there have been many studies that look at  
4 you adding each mile of road, the percent increase in  
5 miles of road ends up increasing VMT, vehicle miles  
6 traveled, by the exact equivalent amount.

7 So, the fact that you're going to do analysis  
8 I'm very supportive of and I appreciate your time. Thank  
9 you.

10 MS. GEORGELAS: Hi, Susan, thank you. I  
11 missed your memo about one question. I do have a comment  
12 and then I have my one question.

13 For far too long our community area has been  
14 experiencing many transportation decision surprises by  
15 officials in VDOT.

16 AUDIENCE MEMBER: Ask your question.

17 MS. GEORGELAS: I'm sorry. I'm sorry, go  
18 ahead.

19 MS. SHAW: Thank you.

20 MS. MERLENE: Hi there. My name is Nicole  
21 Merlene. I'm a candidate for state senate in this  
22 district running against Barbara Favola, the current  
23 incumbent who has moved for legislation on this.

1           So, my question since we're limited to one, it  
 2           seems that one of your intentions has been to increase  
 3           capacity and your projections look like it will be between  
 4           18 to 26 percent increase capacity and you don't have  
 5           assurances from Maryland for an expansion of their bridge  
 6           and we don't seem to be looking to expand GW, so, do you  
 7           expect there to be a bottleneck right at that  
 8           intersection?

9                           (Audience applause)

10           MS. SHAW: So, we don't have that traffic  
 11           analysis just yet. We are audience to have that later in  
 12           the study.

13                           (General verbal comments from the audience)

14                           But I would say I would expect there to be a  
 15           bottleneck without increase capacity on the bridge.

16                           (Yelling and audience applause)

17                           Will there be, I think the question is will  
 18           there be other improvements that we'll see as part of this  
 19           project if Virginia goes forward with their project in  
 20           anticipation of Maryland if there's a period of time where  
 21           Maryland isn't in but we are, is there a benefit and we  
 22           will be looking at analyses for that as well.

23           MS. GEORGELAS: Susan, I'm going to try one

1 more time, guys, and if this doesn't work I'll just ask my  
2 question.

3 For far too long our community area has been  
4 experiencing many transportation decision surprises by  
5 officials in VDOT without proper public process, public  
6 transparency and public input. A few are making major  
7 decisions for all of us. It is time, it is time for a  
8 serious review of some VDOT projects, an independent  
9 review of VDOT practices, management and decision making.

10 Over 20 years ago, VDOT decided to add five  
11 lanes to our Beltway area without proper public process,  
12 notice or transparency. I had to stand in the dark alone  
13 in front of a VDOT bulldozer that was ripping out our  
14 dense area of trees between Live Oak Drive and 495 in  
15 front of Langley Club in order to get VDOT to agree to a  
16 public meeting about this project.

17 The five lanes were added, making our area the  
18 widest, most congested and polluted of the Beltway.  
19 Residents were promised that no more construction, new  
20 lanes would be added here, 495 expansion was to continue  
21 to Tysons, however it so unwisely morphed into HOT lanes.

22 A few years ago VDOT wanted to expand HOT  
23 lanes up to the American Bridge area. [sic] Citizens from

1 McLean and Great Falls wisely and overwhelmingly fought  
2 against the illegal - the illogical I'm sorry - illogical  
3 proposal which would have caused more unwanted congestion  
4 and pollution.

5 Next came the shoulder lane. The shoulder  
6 lane extension surprise on 495 north before the American  
7 Legion Bridge and GW Parkway. Governor McDonnell quietly  
8 signed and funded the project just before leaving office.  
9 Residents knew nothing. No public notice, no promised  
10 notice, no meeting, no promised environmental testing.

11 MS. SHAW: Okay, April --

12 MS. GEORGELAS: I just want to --

13 MS. SHAW: I don't want to cut you short but I  
14 want to respect the people that are here to ask questions.

15 We will take that comment, but can you go  
16 ahead and ask your question --

17 MS. GEORGELAS: This is -- okay, Susan --

18 MS. SHAW: -- and then if we have time, if we  
19 have time I would like to let you continue your comment,  
20 but let's --

21 MS. GEORGELAS: Well, this is important  
22 because VDOT changed the name of that shoulder lane  
23 project from an increased capacity project to an



1 operational lane in order to avoid environmental testing.

2 Pre-construction traffic studies showed an  
3 increase in congestion, travel time and accidents. That's  
4 what we're living with now, guys. VDOT created this.

5 This study has been removed from the website.  
6 Surprise. VDOT ignored -- VDOT ignored the study, took  
7 \$20 million of taxpayer money and built anyway. VDOT  
8 built a new lane and created a mega merge mess before the  
9 American Legion Bridge, added and created nasty  
10 neighborhood cut-through traffic.

11 The merge mess now affects seven lanes across  
12 the bridge, including the access ramp to 495 from 193, an  
13 illegal right shoulder lane. We are all now jammed with  
14 idling, polluting cars, forcing cars back up to the Balls  
15 Hill Road and 193 intersection.

16 Then this year a big surprise for taxpaying  
17 residents, Governor Northam signs a contract with  
18 Transurban. No public transparency or public input. VDOT  
19 now wants to build four new HOT lanes and solve and  
20 improve the traffic congestion mess that VDOT created.

21 VDOT apparently took 20 million of taxpayer  
22 money for a place-saving lane for the long wanted  
23 Transurban HOT lane project. Well, surprise again.

1           At the last ramp closure meeting, residents  
2           overwhelmingly, regardless of closure position, demanded  
3           officials to stop the shoulder HOT lane extension.

4           VDOT officials, your immediate plan must be to  
5           stop the shoulder lane, to ease the merge mess before the  
6           bridge and place a police car in the right illegal lane of  
7           jammed cars.

8           MS. SHAW: April, I am going to really just  
9           appeal to your good heart to stop and let -- I know you  
10          have important comments to make, but there's a bunch of  
11          people in the line behind you and I really want to give  
12          them a chance to ask their questions.

13          MS. GEORGELAS: I want to also add, the other  
14          surprise was Bill 662 for this study. Here's my question.

15  
16          (General complaints from the audience)

17          MS. SHAW: Okay, thank you.

18          (Audience applause)

19          MS. GEORGELAS: And we've been asking for this  
20          study for several years and we haven't gotten it, do HOT  
21          lanes reduce congestion on the Beltway and in neighborhood  
22          traffic? Where is our study?

23          MS. SHAW: So, yes, we believe that they do

1 and we will have traffic studies that look just at that,  
2 especially for this extension. You saw the blue lines of  
3 the surrounding roadway network that we're going to be  
4 looking at.

5 AUDIENCE MEMBER: That's not the question.

6 MS. SHAW: We have seen reduced congestion on  
7 95 Express Lanes as well as the Beltway, both general  
8 purpose lanes have improved, as well we're providing  
9 people with that option to car pool or use transit so that  
10 they can have a consistent and reliable trip.

11 AUDIENCE MEMBER: When you say, "We have seen  
12 from this," are you talking about VDOT and Transurban as  
13 in the people who are like also building the lanes or are  
14 you talking about studies that have been done from  
15 unbiased outside sources?

16 (Audience applause)

17 MS. SHAW: So, it would be from VDOT, yes.

18 AUDIENCE MEMBER: Yeah. Yeah.

19 AUDIENCE MEMBER: And who benefits from it?

20 AUDIENCE MEMBER: VDOT and Transurban.

21 MS. SHAW: Well, VDOT is here to help to try  
22 to move more people. That's our goal.

23 AUDIENCE MEMBER: Susan --

1 AUDIENCE MEMBER: And employ more people.

2 AUDIENCE MEMBER: Yeah. The general lanes,  
3 Susan, will remain the same and the hot lanes don't move  
4 people, they're empty.

5 MS. SHAW: Okay. Thank you.

6 MS. WOMACK: Hi, my name is Carrie Womack and  
7 I have lived here for 19 years and when you mentioned  
8 earlier that the last meeting regarding all of this was  
9 last June, I'd like to know how many people were in  
10 attendance. We all signed in this evening but I can  
11 guarantee you there couldn't have been a lot of people  
12 because nobody knew that this started a year ago in June.

13 So, how many people?

14 MS. SHAW: I think we do have those numbers.  
15 We have a meeting summary. And if it's not on our website  
16 we'll make sure that it gets there.

17 AUDIENCE MEMBER: Seventy-six.

18 MS. WOMACK: Thank you.

19 AUDIENCE MEMBER: I want to know why you're  
20 doing a project with the assumption that Maryland is going  
21 to be doing it on the other side.

22 (Audience applause)

23 Why don't we have their commitment to widen?



1 We're letting Maryland people come over here, we're  
2 widening it and they should have to have a commitment too.

3 Why is Transurban not saying okay, we're going  
4 to widen it over there as well?

5 MS. SHAW: Okay.

6 AUDIENCE MEMBER: We can't base things on  
7 assumptions. And also, why is there no one up here  
8 explaining the maps and how much of the Greenway is going  
9 to be taken away, showing people?

10 People are visual. People need things  
11 explained. We don't want to just hear somebody come up  
12 here and tell us all their facts, we want to see what is  
13 going to be taken exactly and how it's going to be done  
14 and we deserve that and how it's going to affect that  
15 neighborhood.

16 I had a listing on Live Oak, at the very end,  
17 we couldn't sell it because the Beltway was in their back  
18 yard. You couldn't sit out there for five minutes, you  
19 couldn't even hear yourself think. And we wrote letters  
20 to the county talking about the decibels, they were saying  
21 the decibels are fine the way they are. They're absurd.  
22 The decibels were -- you couldn't even hear yourself  
23 think.

1 (Audience applause)

2 MS. SHAW: So let me answer what I think what  
3 your questions were.

4 So, one is that both Virginia and Maryland  
5 have their projects in what we call the approved  
6 constrained long-range plan. And so from an  
7 environmental, regulatory standpoint we're required, when  
8 we do our traffic study, to include their project because  
9 the region has voted to include their project.

10 Now, we will be doing a sensitivity analysis  
11 for the 2025 year, which is an interim year, that will  
12 look at our project in place and Maryland not in place.  
13 So, we do understand that people want to kind of  
14 understand what that looks like, but from a regulatory  
15 standpoint we're following that regulation.

16 AUDIENCE MEMBER: I still don't understand why  
17 are you doing a project on this side if it's just going to  
18 cause a bottleneck on that side?

19 The whole purpose of it is to get rid of the  
20 bottleneck and you're just going to be causing one.

21 MS. SHAW: I mean the goal --

22 AUDIENCE MEMBER: So it's illogical, it's  
23 stupid.

1 (Audience applause)

2 MS. SHAW: So I will say we're coordinating  
3 closely with --

4 AUDIENCE MEMBER: Hello, is anybody up there?  
5 VDOT? VDOT?

6 (Laughter)

7 AUDIENCE MEMBER: I mean, is anyone there or  
8 thinking?

9 MS. SHAW: So we do have, our partners from  
10 Maryland have a couple of boards at the back. We have  
11 been meeting with them monthly and on a routine basis.

12 AUDIENCE MEMBER: Well, you need to get  
13 somebody with a brain in there. Thank you very much.

14 (Laughter)

15 MS. SHAW: All right.

16 MS. BUTLER: Hi. My name is Debra Butler and  
17 I am also a McLean citizen, and I'd like to talk to you  
18 about the environmental impact. Oops, excuse me, the  
19 environmental assessment.

20 I'd like to talk to you about bridges, cement,  
21 pollution, parks, national land, county land, Scott's Run.  
22 If you go to the Fairfax County Scott's Run Nature  
23 Preserve page it talks about 140-year old million

1 geological, rare birds, rare plants and by the way, okay,  
2 you're only going to take a little small portion of that.  
3 Small. The noise, the environmental pollution spreads.

4 And I want to ask, why are we having an  
5 assessment and not a full impact study? I would also like  
6 to ask in relation to that, where is the Federal Highway,  
7 the National Parks on this position?

8 Barbara Favola, when she was then county  
9 supervisor of Arlington, successfully sued VDOT and the  
10 Federal Highway to stop this project until they got it  
11 right in Arlington with no impact to their citizens.

12 Mr. Foust, Supervisor Foust, I challenge you.  
13 Step up to the citizens who have elected you.

14 (Audience applause)

15 Barbara Favola, we need you again.

16 MS. SHAW: Let me ask Amanda --

17 MS. BUTLER: Kathleen Murphy is at a  
18 multimillion dollar mansion right now generating money for  
19 her campaign. Where are the people who are projecting our  
20 environment, our health?

21 Our children go to the NIH. You can see what  
22 being near a highway does to the impact on children's  
23 brains. Who is protecting our citizens? Where's the



1 Federal Highway? Where is NEPA? Where is the Parks?

2 MS. SHAW: Okay. I'm going to ask Amanda  
3 Baxter who's leading our environmental assessment study to  
4 kind of talk about the difference between an EIS and an EA  
5 and FHWA's role.

6 MS. BUTLER: And whom do you work for?

7 MS. BAXTER: Hi, my name is Amanda Baxter. I  
8 work for Kimley-Horn, we're a consultant to VDOT and we  
9 are preparing the NEPA document.

10 MS. BUTLER: Ah, I'm sorry, I want the  
11 Federal Highway, I want the National Parks, I want the  
12 NEPA people who are going to work for us as citizens not  
13 for the construction people.

14 MS. BAXTER: So, we're working for VDOT and  
15 we're preparing the assessment, the NEPA assessment, for  
16 VDOT and for Federal Highway. So we are in communications  
17 and meetings and coordination with Federal Highway on this  
18 project.

19 Let me just describe, because you mentioned  
20 NEPA which is a really important process. It's based on a  
21 federal action taking place in the project. It's the  
22 National Environmental Policy Act. There are different  
23 levels of documentation that are done for NEPA.

1                   This particular project, we're doing an  
2 environmental assessment.

3                   MS. BUTLER: Why?

4                   MS. BAXTER: For this project?

5                   MS. BUTLER: Yes.

6                   MS. BAXTER: Because we have the ability to  
7 look at a no-build condition and a build condition and to  
8 test whether there's a significant impact to the  
9 environment.

10                   When you do an environmental impact statement,  
11 you have predetermined that there is a significant impact.  
12 When you do an environmental assessment, you're assessing  
13 on whether or not there's actually a significant impact or  
14 a no significant impact, and that's what the analysis will  
15 determine and we'll present to you in the fall.

16                   MS. BUTLER: And taking away park land isn't a  
17 significant impact?

18                   MS. BAXTER: So, it is a conglomeration of the  
19 impacts as an entirety. So we will look along the  
20 corridor. This is a developed corridor.

21                   And a couple of the things that you addressed  
22 are things that we'll be addressing in our assessment and  
23 I'll start, for one for example, for storm water

1 management. You address like pavement, runoff, Scott's  
2 Run. That will be assessed in the manner of we would need  
3 to be treating the impervious pavement that we introduce  
4 to the project.

5 This actually is a corridor that does not have  
6 storm water management in effect and we're introducing  
7 that as an added benefit to this corridor to provide that  
8 runoff and water quality that this corridor needs.

9 So when you look at Scott's Run Nature  
10 Preserve, we have been in communications with Fairfax  
11 County Park Authority who manages that land. They are  
12 very encouraged by the fact that we're introducing  
13 stormwater management to this project because Scott's Run  
14 has such a high flow, because the water is not treated or  
15 stored properly and, you know, it really rips very  
16 quickly. There's a high flow that goes through their  
17 park.

18 So we will take that all into assessment when  
19 we put in our project and that's part of our assessment  
20 that we'll present in our NEPA document.

21 MS. BUTLER: And are you independently -- are  
22 you independently emboldened to make this decision without  
23 input from our VDOT and Transurban team?

1 MS. BAXTER: Well, let me just back up really  
2 quickly of how we start the process.

3 MS. BUTLER: Yes.

4 MS. BAXTER: We do start the process using  
5 scoping letters that we send out to regulatory agencies,  
6 local officials, Fish and Wildlife Service for example.

7 We also take the project through what we call  
8 a partnering project with the regulators. We've just been  
9 through three of those meetings. That's the Environmental  
10 Protection Agency, Fish and Wildlife Service, the U.S.  
11 Army Corps of Engineers, Virginia Department Environmental  
12 Quality. We've had four of those meeting presenting data  
13 and information as we've been out in the field collecting  
14 it.

15 So, we have been at this for a while and we  
16 are combining that. We'll have a national resource  
17 technical report that will introduce all of these findings  
18 in and --

19 MS. BUTLER: Will that be to the public?

20 MS. BAXTER: It will be.

21 MS. BUTLER: Okay.

22 MS. BAXTER: So all the technical reports that  
23 you've described will be associated with -- the



1 environmental assessment piece in more of a summary, a  
2 combination of all those technical reports into one report  
3 that we would then present to the Federal Highway  
4 Administration and they will have to make the decision.

5 We're doing it, you know, as a representation  
6 of VDOT's process. For example, we're using VDOT's noise  
7 policy to assess noise, air quality for example.

8 MS. BUTLER: VDOT's policies.

9 MS. BAXTER: VDOT's noise -- every state DOT  
10 across the nation has their own noise policy. We are  
11 following VDOT's noise policy.

12 MS. BUTLER: Okay. They had said they were  
13 following the Federal Highway, so we'll get  
14 (Unintelligible) Thank you very much.

15 MS. BAXTER: It is a trickle down. I mean,  
16 the FHWA has to adopt VDOT's policy, so they still are  
17 involved in that.

18 MS. BUTLER: Okay. Thank you very much.

19 MS. BAXTER: Sure.

20 MS. BUTLER: Hi. My name is Brenna Butler.  
21 I've lived here for about 12 years now. I'm actually from  
22 Brooklyn, New York and my family and I moved down here --  
23 my family moved down here so that I would have a place to

1 ride a bike and walk a dog.

2 I live on Green Oak Drive and due to your  
3 proposed planning in the back, um I see that you guys are  
4 going to be taking land from our neighborhoods, our  
5 neighborhood specifically, and that um the highway as  
6 mentioned before would have a six-foot wide sidewalk, is  
7 that right?

8 MS. SHAW: It depends on where you are.  
9 Basically along the Beltway it's a ten-foot wide paved  
10 shared use path.

11 MS. BUTLER: So I'm just wondering who's  
12 looking out for the future of the community? Like kids my  
13 age who -- I wanted to move back -- I love McLean, McLean  
14 quickly became my home and who is looking out for us?

15 Are my kids going to have to walk home from  
16 Cooper Middle School on a ten-foot wide sidewalk, high  
17 walk, sidewalk? (Laughter) I mean like are they going to  
18 have to like walk on the sidewalk next to the highway home  
19 from school?

20 And what's happening to our parks and um like  
21 who's going to protect the parks? A reason I fell in love  
22 with McLean is that there's so much greenery and scenery  
23 and it's beautiful here.

1           And like people that are from this community,  
2 if it becomes a highway pit stop are not going to want to  
3 come back and bring their children here.

4           And like if there is no more greenery and  
5 scenery, the population will go down and then the highways  
6 will no longer be needed and you're going to have these  
7 wide highways and no one to drive on them.

8           (Laughter and applause)

9           MS. SHAW: Thank you. So, it is a balance.  
10 You know, providing pedestrian facilities, that takes  
11 green space, but then it's kind of a green way to, you  
12 know, move through the region. So, it's a balance and so  
13 we're going to try to strike that balance.

14           We do have certain requirements around the  
15 park property. Any park property that we take from the  
16 preserve we have to actually buy replacement land that's  
17 adjacent to the park that they can then use so they have  
18 no loss to the park.

19           And we'll also be looking for ways to do  
20 revegetation, but I want to be honest, I mean, we are  
21 talking about adding lanes, it does mean there will be  
22 tree loss in the corridor.

23           MS. BUTLER: Yeah. I mean, it is -- I mean

1 you say there's a balance but it doesn't quite sound like  
2 a balance when environmental impact studies haven't been  
3 done, environmental assessments haven't been done, you  
4 haven't gotten confident information from the other side,  
5 if they're meeting us. It sounds like we're going into a  
6 project that really has no plan.

7 And it really seems that a lot of these  
8 officials here aren't looking out for the community and  
9 kids my age, they're just looking out for their companies  
10 and this project quite frankly just goes like right into  
11 their pockets and it's not fair to the community and it's  
12 just not right.

13 (Audience applause)

14 MS. SHAW: Thank you.

15 AUDIENCE MEMBER: My name is Jose and I have  
16 one comment and one question. Many people ask this  
17 question, --

18 AUDIENCE MEMBER: We can't hear you.

19 AUDIENCE MEMBER: I am not a traffic expert  
20 but it doesn't make sense that if Maryland is not going to  
21 expand the bridge you guys got to start going with your  
22 project. I mean, that's the comment.

23 (Audience applause.)



1           The question is, I live in Largo, but I know  
2 many people from here live in Largo, they already have a  
3 lot of noise. So I was wondering, what is your measure  
4 for measuring noise because we already think we have a lot  
5 of noise and you have to expand the wall.

6           So I was wondering, how do you guys measure  
7 the noise?

8           MS. SHAW: So, we do have our noise experts  
9 back in the back, Jim, L.J. I see, yes. And so I'm going  
10 to ask you to speak with them. I can give you an  
11 overview.

12           AUDIENCE MEMBER: Okay.

13           MS. SHAW: We do take noise measurements along  
14 the corridor to get an idea of what the existing traffic  
15 noise is and then we use our traffic models and we project  
16 traffic for the build year, which is 2045, and look at  
17 what the noise would be at the worst noisiest hour, which  
18 sometimes is not the peak hour because if traffic is at a  
19 dead stop it might not be making as much noise as if it's  
20 traveling faster.

21           But, the people who can really answer that  
22 question -- but we do take into account terrain, we look  
23 at where the tires are hitting that pavement, where the

1 receptors are in terms of outdoor use is what we're  
2 looking to protect.

3 So, Jim, I'm going to ask if you can get with  
4 gentleman maybe and go into more detail about the noise.

5 AUDIENCE MEMBER: Okay.

6 AUDIENCE MEMBER: Can you answer the question  
7 about why you're doing these lanes and nothing on the  
8 bridge?

9 MS. SHAW: Oh, the other thing is that, you  
10 know, and I think this has been asked a couple of times,  
11 we haven't finished our study. So we're in the middle of  
12 a study and we wanted to let you see everything that we  
13 have. What we've got tonight is where we are in the  
14 study.

15 We don't have all the answers, but one of the  
16 things that we are going to look at is that interim  
17 traffic year to see what it looks like in 2025 without  
18 Maryland and with our project. That will be one of the  
19 things that goes into this broad decision point about  
20 whether we move forward with our project without Maryland  
21 or not.

22 AUDIENCE MEMBER: Thank you.

23 AUDIENCE MEMBER: You still haven't answered

1 my question.

2 AUDIENCE MEMBER: Yeah, you still haven't  
3 answered the question.

4 AUDIENCE MEMBER: Why are we doing this and  
5 expanding all these lanes and the bridge is not being  
6 rebuilt or widened? That's the back up. That's the jam  
7 up, is on the bridge.

8 MS. SHAW: Right. And we agree with that but  
9 we also believe --

10 (Audience applause)

11 AUDIENCE MEMBER: Maryland and Virginia have  
12 not been able to get together to agree to the funding for  
13 that bridge. So now you're going to a private company,  
14 that a private company funds this expansion lanes and it's  
15 going to be much worse. (Unintelligible)

16 MS. SHAW: Right. We believe that our traffic  
17 studies that we come back to you with in the fall will  
18 demonstrate that there's a benefit to the project, but we  
19 don't have those numbers today. It's what we've -- we've  
20 looked at it, we've got our traffic people here tonight.  
21 They are also willing to talk with you back at the boards.

22 I understand your concern and what you're  
23 saying and I think, you know, if our traffic studies show

1 there is absolutely no benefit we won't move forward. We  
2 won't. But we believe that there will be.

3 (Audience applause)

4 (Audience member asking question from the  
5 back, unintelligible - not using a microphone)

6 MR. DANE: Hi. My name is John Dane. I've  
7 lived in the area for over 30 years, also originally from  
8 Brooklyn.

9 (Audience applause)

10 Sixth Street as a matter of fact.

11 (Laughter)

12 My question is this, the map you had with the  
13 study overview has all the blue lines of kind of the study  
14 area, they go along the Beltway from the Toll Road up to  
15 the bridge, but then they also extend way down along the  
16 Toll Road to Spring Hill and down the other way to Dolly  
17 Madison and south on the Beltway all the way to 123, and  
18 my question is why? What's going on there?

19 MS. SHAW: So, we look at how the project  
20 impacts traffic in and around the Beltway, not just at the  
21 Beltway. We're not necessarily proposing any improvements  
22 there, but we understand it's a regional network and we  
23 want to see how what we do on one area might impact flow



1 and traffic on another.

2 MR. DANE: You said not necessarily, is it  
3 possible that we'll see additional construction on those  
4 areas in the blue dots?

5 MS. SHAW: It's possible. That's one of the  
6 things that we work with FHWA on when we look at what the  
7 results are with the build versus the no-build. We'll  
8 look at those areas to see if there's any kind of hot  
9 spots that we need to address as well as what we're  
10 proposing on the Beltway.

11 MR. DANE: When would that be folded into the  
12 study if you did that?

13 MS. SHAW: That would be over the summer as  
14 traffic results become available to us.

15 MR. DANE: Okay. Thank you.

16 MS. SHAW: So we also work closely with  
17 Fairfax County Department of Transportation. So they also  
18 are kind of looking out for the County's interest and work  
19 with them. I know they've got a couple of representatives  
20 here tonight, Martha Coello and Eugene Yuqing are at the  
21 back there, and Chris representing our Trails Community.

22 So, they're also here kind of observing and  
23 trying to get a feel for any comments or questions that

1 people have.

2 MS. HUGH: Hi, my name is Betty Hugh [ph] and  
3 I think you may have partially answered my question in  
4 this process, but the question is, when can you provide  
5 the 2025 sensitivity analysis that shows the impacts if  
6 the Maryland project does not go forward, because it would  
7 be probably of great interest to the community not to have  
8 to wait for an analysis to be provided until the fall of  
9 this year for the report when you provide the draft  
10 environmental assessment?

11 MS. SHAW: I mean, it's currently scheduled  
12 for the fall. We'll get back with our team to see if we  
13 can move that up at all. I do understand the sensitivity  
14 of it, but there's a lot of work that's got to go between  
15 now and then. So, the fall is when it's currently  
16 planned.

17 AUDIENCE MEMBER: Thank you. I'm (inaudible).  
18 I've also lived in this area for 35 years. My question is  
19 about the selection of Transurban for the building of the  
20 project. It looks like there's been an agreement that's  
21 been signed with them.

22 And my question really is what other options  
23 has the State, has VDOT considered for funding and

1 financing that project? How was the selection of  
2 Transurban taken place and under what terms and  
3 conditions?

4 What is the (Unintelligible) rate at the time  
5 of (Unintelligible) of Transurban from this project? Has  
6 that analysis been done and how does that compare to other  
7 alternative sources of funding, like raising taxes or  
8 issuing specific bonds on this area?

9 And to what extent are the economic benefits  
10 that Transurban will receive will the offset by some  
11 payment to the State for acquiring and using public land  
12 for tracking purposes?

13 And finally, what are the terms of the  
14 agreement with Transurban, for how many years does it run  
15 and what happens afterwards?

16 (Audience applause)

17 MS. SHAW: I'm not sure how many questions  
18 that was but it was definitely more than one. But let me  
19 just say the agreement that is with Transurban has  
20 (Unintelligible) end date which is 2087, and that is from  
21 the original deal that was signed. So this would get  
22 rolled up into that, it would not extend that date any.

23 This is a developmental framework agreement,

1 it is not subject to public disclosure. That is because  
2 if we abort, say partly through with Transurban, which  
3 VDOT always has that option, if they don't meet our -- if  
4 we can't successfully negotiate what the terms and  
5 conditions might be for the binding proposal or if they  
6 are unable to submit a binding proposal, we could have  
7 options to go out and procure it in a different manner,  
8 and they may compete on that. So there is this protection  
9 of their competition stance as we move forward.

10 But VDOT does have the ability to not accept  
11 the binding proposal. So, we've set the terms and  
12 conditions. We work on that. We're kind of working on  
13 that process now, the framework just kind of sets the  
14 broad guidance about how we're going to move forward with  
15 developing a binding proposal.

16 So we're not -- it's not a done deal. It's a  
17 partly done deal, and it kind of represents the fact that  
18 there's a lot of efficiencies in having the current  
19 operator just extend their existing system without adding  
20 all that new infrastructure. They already have an  
21 operations center where they monitor traffic. They've  
22 already got tolling people in place doing all the  
23 necessary things. They've got maintenance people out



1 there maintaining the Express Lanes.

2 So, there is quite a bit of efficiencies in  
3 terms of them providing the extension and it is allowed in  
4 the confidence of agreement that we've already signed.

5 AUDIENCE MEMBER: (Unintelligible - not using  
6 microphone)

7 MS. SHAW: Yeah, so we have a robust analysis  
8 that we'll be doing where we compare it to a publically  
9 financed process as well. We did something similar on 66  
10 outside the Beltway where we compared with some other  
11 options. But I think, you know, the stipulation is that  
12 there be no public, or no Commonwealth contribution for  
13 the project.

14 Our rough estimate at this point in terms of  
15 what we're talking about in an initial phase, and this  
16 does not including the American Legion Bridge or anything  
17 else, it's just looking at adding the lanes as we are  
18 showing them and the connections at the interchange, is  
19 somewhere around the \$500 million range is what we believe  
20 the cost of the project is.

21 If you looked at Smart Scale and what the  
22 region got this year for Smart Scale, I'm looking to  
23 anybody over there, but it was not 500 million. The

1 region did not get 500 million statewide, it's much less  
2 than that. So it's a pretty heavy lift to completely  
3 publically finance and pay for a project of this size.

4 AUDIENCE MEMBER: (Unintelligible - not using  
5 microphone)

6 MS. SHAW: So, yes, there is a lot of that. A  
7 lot of that is proprietary.

8 I will say in all of these deals there are  
9 stipulations where if they exceed certain levels then  
10 there is a revenue sharing that goes back to the public.

11 AUDIENCE MEMBER: Can you state  
12 (Unintelligible - not using microphone)

13 MS. SHAW: I don't have the numbers with me so  
14 --

15 AUDIENCE MEMBER: (Unintelligible - not using  
16 microphone)

17 MS. SHAW: -- so I --

18 AUDIENCE MEMBER: (Unintelligible - not using  
19 microphone)

20 MS. O'TOOLE: My name is Bridget O'Toole and  
21 I've lived in McLean for 15 years, and my question is  
22 around the HOV lane.

23 So, I understand why the toll lanes need to be

1 separated because you need to charge a toll, but if  
2 there's no charge for the HOV lane, why are they being  
3 separated?

4 The HOT lanes are not used partially because  
5 they're expensive, but partially because they are  
6 difficult to get on and off of. They're not at the normal  
7 interchanges. And so every other highway just has an HOV  
8 lane that you can get on and off of whenever you want, why  
9 do these have to be separated if they're not getting  
10 charged for?

11 (Audience applause)

12 MS. SHAW: So, they are shared, I will say  
13 with the toll paying people, and if you drive 66 today and  
14 you see what an HOV lane looks like that anybody can get  
15 in and out of, it doesn't work very well.

16 AUDIENCE MEMBER: Well, you got --

17 MS. SHAW: I'm just telling you.

18 AUDIENCE MEMBER: You've got 495 and no one's  
19 in the HOT lane, so I don't understand how it's going to  
20 ease congestion.

21 MS. SHAW: Yeah.

22 AUDIENCE MEMBER: I mean, you guys, you guys  
23 did a model before you built the HOT lanes that exist

1 today, does the traffic not match your model?

2 (Audience laughter and applause)

3 MS. SHAW: So, I'll take that question back  
4 and I know we --

5 (Audience laughter and applause)

6 AUDIENCE MEMBER: Of course it doesn't match  
7 the model, come on.

8 MS. SHAW: I would say for 495, in the opening  
9 year the traffic did not match up with the projections,  
10 but since that time they've kind of reset and I believe  
11 they are not exceeding those projections. But I will need  
12 to go back to get the actual numbers. We'll take that  
13 question back.

14 MR. PAN: Good evening, my name is Gary Pan.  
15 I have lived in Great Falls for 20 years, right off of  
16 Georgetown Pike, actually also running for state delegate  
17 for Great Falls, McLean and other areas. I'm here tonight  
18 and that's--

19 (Audience applause)

20 More importantly, we have a lot of traffic  
21 construction going on. Route 7 widening is happening as  
22 well.

23 You know, after we had the tolls go in, we had



1 a dramatic increase to the traffic on Georgetown Pike.  
2 Huge, in both ways, all day long, right. Now we have  
3 Route 7 come on board and it's going to have a huge impact  
4 on this area.

5 So I asked VDOT at a recent presentation over  
6 at Forestville Elementary School about the analysis that  
7 you guys have done. And I asked them, have you done a  
8 holistic, you know, review of this and they said, "Yes, we  
9 did a long time ago when we did the scope of work for the  
10 project and it hasn't been updated."

11 So my question is, how can, you know, can we  
12 expect it to be done a little bit more timely and periodic  
13 review of the traffic impact because all these projects  
14 change all the time, we understand that, but we as  
15 citizens need to be aware of what's coming down the pipe  
16 because it's just congestion all day long?

17 (Audience applause)

18 MS. SHAW: Okay. So I think your question is  
19 how we manage traffic during construction given that  
20 there's so much going on in the region and we do have a  
21 regional management traffic plan, so that's one of the  
22 things that we will work on with our partners and I think  
23 it's a fair point that maybe we need to expand that to

1 some of the multiple project corridors that we have under  
2 construction. So, thank you.

3 AUDIENCE MEMBER: I'm sorry, you spoke a lot  
4 about if we're going to do the construction and Maryland's  
5 not ready what's going to happen and you're looking at  
6 that alternative and that possibility.

7 Have you taken the other side, I did not hear  
8 that at all, that we don't do anything and Maryland does  
9 their lanes and we see what the improvement will be?

10 (Audience applause)

11 MS. SHAW: So, Maryland will be doing that in  
12 their environmental study.

13 AUDIENCE MEMBER: I'm sure that they will,  
14 but --

15 MS. SHAW: Yeah, because

16 AUDIENCE MEMBER: (Unintelligible)

17 MS. SHAW: Right, because they'll assume that  
18 we're in and they're not in, right? Yeah.

19 (Questions/comments called out from the  
20 Audience, no one using microphone)

21 You want them in and we're not in, we will do  
22 that study. Yeah, we'll do that study. That's our no-  
23 build. That's our no-build, yeah.

1 AUDIENCE MEMBER: And when do we get to see  
2 the results of that?

3 MS. SHAW: Well, we have some of it tonight,  
4 the 2045, the preliminary study.

5 (Questions/comments called out from the  
6 Audience, no one using microphone)

7 MS. SHAW: Yeah, because that was with  
8 Maryland assumed to be in in the year 2045 and the no-  
9 build was us not in but them in. So, I don't think we  
10 have 2025 yet for that. We'll have that in the fall.

11 AUDIENCE MEMBER: So where do you see that?

12 MS. SHAW: Rob, you want to -- Rob Prunty is  
13 our traffic guy. There's the two big screens back there,  
14 they can scroll through whatever displays you want to look  
15 at.

16 Yes?

17 MR. BARRENS: My name is Bill Barrens. [sic]  
18 I've lived in McLean for 48 years. A critical time period  
19 for this discussion is after we build in Virginia and  
20 before Maryland builds and I have the impression that's  
21 being sort of shoved under the rug. The traffic analysis  
22 should specifically address the period before completion  
23 of the Maryland construction.

1           It's a nearly \$10 million project, it's highly  
2           suspect politically. There are many people in Maryland  
3           that think they ought to spend the money to support the  
4           Baltimore area not Montgomery County.

5           The question then also was, if there is  
6           substantial period and it's going to be deadly in it's  
7           effect on traffic on the Beltway, if the project is to go  
8           on and proceed at all, can it successfully be constrained  
9           by progress of the Maryland bill so that we stop if  
10          Maryland's not in any position to be close to providing  
11          the bridge upon completion of the Virginia work? That  
12          could be a period of many years, and during those many  
13          years you'll do a lot of damage to McLean and won't  
14          achieve anything but to screw traffic.

15                   (Audience applause)

16          MS. SHAW: Thank you. I'm going to just kind  
17          of if it's a routine question I'm not going to really  
18          answer again, but then I think that one you've talked  
19          about quite a bit and I understand the concern.

20                 We are at 8:27. We are supposed to be out of  
21          here at 8:30, but, you know, we can try to keep going with  
22          questions. I'm looking to my public affairs people.  
23          Okay, we're going to check.



1 MR. WHITFIELD: I'm Rob Whitfield with the  
2 Fairfax County Taxpayers Alliance and I've lived in  
3 Fairfax County for over 40 years, 10 years in McLean. So  
4 (Unintelligible) highway network (Unintelligible) North  
5 Carolina to New York state.

6 This question is about the truck management  
7 and the idea on I-66 they introduced several years ago  
8 some kind of speed monitoring system starting, let's say  
9 out near Centreville, and the idea is that if there's an  
10 incident ahead, let's say at 123, they have variable speed  
11 signs that lower the speed.

12 So, back a couple of months ago there was a  
13 tanker crash near the bridge. So I suggested to, I guess  
14 it was Nick Donohue or the Transportation Secretary, the  
15 need -- we need to do certain things now rather than  
16 waiting five years for some new project.

17 So, speed control signs, let's say north of  
18 Tyson's Corner, is something that can be done this year.  
19 Yes, it has to (Unintelligible) the budget to be approved.  
20 Right now 87 percent of our money from Northern Virginia  
21 is being shoveled to Arlington and Alexandria for transit  
22 projects.

23 Of course there was no similar help from

1 Arlington and Alexandria to build the Silver Line for \$6  
2 billion, three billion of which comes from tolls from  
3 people.

4 MS. SHAW: Excuse me, do you have a question?

5 MR. WHITFIELD: So my question for you is,  
6 while it's just not truck safety, it's overall safety, has  
7 any specific proposal been made to improve safety on this  
8 section of highway?

9 Furthermore, the area south of Tyson's Corner,  
10 north of 66, is increasingly congested, so we need to look  
11 in terms of an overall plan, not just for this one segment  
12 here, but let's say north of 66 over the next 30, 40  
13 years.

14 One of the problems we have is with this  
15 private sector, if you go and look at the financial plan  
16 for I-66, 90 percent of it is from investors, and this is  
17 totally unacceptable because nobody has any sense of what  
18 the rate of return being gained by the investors. It's  
19 certainly far more than the cost of bonds that VDOT sells  
20 at about four percent. So the equity is probably  
21 somewhere between 13 and 16 percent, and the end product  
22 we pay for --

23 MS. SHAW: Okay. I'm going to ask you to

1 please ask a question (Unintelligible)

2 MR. WHITFIELD: Okay. What are you going to  
3 do to improve the public disclosure of vital financial  
4 information and cost of collection and then I would ask  
5 that you create a venue, either in McLean or Tyson's,  
6 where people can go and look at the actual data that you  
7 have today so it's not this kind of loopy-goopy forum.

8 MS. SHAW: I'll take that to a colleague, but  
9 I will just say the Office of the Attorney General  
10 approves what can and can not be released. So we follow  
11 the Code. It's not really necessarily a VDOT issue, but  
12 we do get review and determination from their office.

13 MR. WHITFIELD: So please provide - I was here  
14 at the meeting a year ago - please provide a venue where  
15 the public can read what has been asked and what your  
16 answers are.

17 MS. SHAW: Okay. Thank you.

18 Yes?

19 MS. PONA: Hi, I'm Natalia Pona. [ph] You're  
20 painfully aware that you have a fairly sophisticated  
21 audience and my comments generally follow the line of  
22 trust but verify.

23 So my request is that the environmental study,

1 if you can please provide the raw data, not relative data  
2 but the actual raw data, ideally simultaneous if not  
3 before the next meeting, that would be fabulous.

4 (Increase volume in background talking)

5 And then also if you can provide the modeling  
6 that's used and the assumptions that go into your models  
7 so that there is (Unintelligible) this work and replicate  
8 your models.

9 MS. SHAW: Thank you.

10 MS. PONA: Thank you.

11 AUDIENCE MEMBER: My name is Anastasia  
12 Carbusos [ph] and I'm actually running for school board of  
13 Fairfax County here in Dranesville and one of the main  
14 concerns is actually safety. And tonight (Unintelligible)  
15 look at the maps you provided in the 2025 and 2045  
16 projections and the most critical, we're here right now at  
17 Cooper, and there's no plans to actually help the  
18 congestion right in front of the school.

19 So right now, in order to, you know, make the  
20 left from Balls Hill to Georgetown Pike takes forever. If  
21 you want to go to make a right, you know, there's no  
22 light, there's no right lane to go. It's a very simple  
23 solution.



1 I was talking to your staff and they said oh,  
2 it's such an easy thing to do. So, I'm asking if you can  
3 really look into that because being able to come in and  
4 out of Cooper, the safety of our children is imperative.

5 It's great to talk about the larger scheme of  
6 things, but something that should be addressed today at a  
7 minimal cost should really be addressed by VDOT and I urge  
8 you to really look into that, to how it would be for cars  
9 to be able to come into Cooper and also for the traffic,  
10 you need to make a right lane -- I live right off  
11 Georgetown Pike, I pick up my child and I have to wait in  
12 line for everybody going left.

13 So it's an easy solution and I urge you to  
14 look into this. Thank you.

15 (Audience applause)

16 MS. HALL: Hi, my name is Mary Hall and I live  
17 on Green Oak. I just moved there. I'm very concerned  
18 about the flyover plan, but it's caused me, because I'm  
19 sort of new to this community, to consider why we're  
20 having this here.

21 If you look at all of the bridges that get us  
22 over to Maryland or Washington DC, they are very heavy on  
23 this side of Fairfax County. You have the Key Bridge, you

1 have the Chain Bridge and then you have this American  
2 Legion Bridge.

3 My question, and I understand that Maryland is  
4 not onboard for any of this, but my question is, have you  
5 considered having another point of entry further west in  
6 Fairfax County.

7 The Dranesville District, the Leesburg Pike, I  
8 know they've widened it. Wouldn't it be tactical to have  
9 some sort of bridge from say Seneca Road to Maryland and  
10 then use that Carderock infrastructure that is not getting  
11 used on a regular basis?

12 Those roads are empty. Whether it's morning,  
13 noon or night, those roads are empty. So I don't  
14 understand if there is a federal parks issue over there or  
15 if it's Maryland is just not coming to the table so we  
16 haven't considered that.

17 My question is, have you considered almost any  
18 other idea than this?

19 MS. SHAW: So, there have been a number of  
20 discrepancies - (audience applause) - (Unintelligible) not  
21 at the American Legion Bridge and I would just say that,  
22 you know, anything that we're doing with this project  
23 doesn't preclude that from happening, so that could still

1 happen.

2 I know today Loudoun County is actually doing  
3 a study of additional crossings themselves for Loudoun  
4 County. So, I mean, it's been studied through the years  
5 but this project is focused on capacity in the 495  
6 corridor.

7 MR. O'TOOLE: Hi, my name is Brian O'Toole. I  
8 live in McLean. I have just a simple question.

9 Would VDOT consider this project if Transurban  
10 wasn't paying for it?

11 (Audience applause)

12 MS. SHAW: So, you know, we actually started  
13 the project before Transurban was involved. So when we  
14 started in the Spring, that was just -- we were just doing  
15 an environmental study and actually some of the  
16 information that's being gathered today is probably more  
17 than what we would have done just because they are now  
18 doing that effort.

19 MR. O'TOOLE: It just seems that if you added  
20 two general purpose lanes in each direction you would  
21 increase capacity by 50 percent without all of this  
22 infrastructure, flyovers or HOT lanes and make it  
23 available to everybody not just --

1 (Audience applause)

2 MS. SHAW: And I think (Unintelligible) want  
3 to say that we focused on our Express Lanes project, it's  
4 moving more people. That HOV three component and having  
5 buses and transit vehicles being able to move at a  
6 guaranteed free flow is really important to us.

7 If you look at, you know, adding more general  
8 purpose lanes it still would not get us out of congestion.  
9 So really what we're doing is trying to provide those two  
10 lanes in each direction that could move at a guaranteed  
11 speed.

12 (Increased volume of background noise)

13 AUDIENCE MEMBER: (Unintelligible - not using  
14 microphone)

15 MS. SHAW: Yes.

16 AUDIENCE MEMBER: (Unintelligible - not using  
17 microphone)

18 THE COURT REPORTER: Susan, they have to quiet  
19 down in the back, I can't hear.

20 MS. SHAW: Okay. Can I ask the people in the  
21 back to kind of keep it down just a little bit and the  
22 people at the mic to try to speak up or make sure you're  
23 hitting the mic. We are trying to record the conversation



1 here so that we can have a record. Thank you.

2 MR. HALL: My name is Scott Hall. I'm running  
3 for grandparent but my children are not cooperating.

4 (Laughter)

5 When the Silver Line was announced, our  
6 Supervisor John Foust did everything he could to get  
7 consideration to have the subway put underground. And  
8 despite his efforts it became fairly apparent that it was  
9 a done deal. It was said that (Unintelligible) didn't  
10 want to pay a French firm to tunnel under.

11 It seems to us, to many of us I believe, that  
12 this is a done deal, and I'll tell you why.

13 (Audience applause)

14 You've been asked a number of times about, you  
15 know, this study or that study and you keep say we're  
16 going to get it done.

17 So my question to you is, once you get them  
18 done, what period of time will there be between your  
19 getting them done and your signing a final contract and  
20 how much public hearings will be held?

21 (Audience applause)

22 MS. SHAW: So right now we anticipate having  
23 one public hearing in the fall and then as we said

1 contract would be, the earliest with Transurban would be  
2 sometime in 2020.

3 MR. HALL: That wasn't my question.

4 What my question was, is once you get the  
5 studies done, what period of time will elapse between the  
6 studies being done and published and a final signing and  
7 during that period, assuming there is any period between  
8 there, how many public hearings will you have?

9 In other words, if you don't get the studies  
10 done I think you need to put off signing the contract  
11 until you get the studies done and let the community take  
12 a look at them.

13 MS. SHAW: Right, and that is required. I  
14 mean, we have to get the environmental decision completed  
15 before we would enter into a contract.

16 AUDIENCE MEMBER: (Unintelligible - not using  
17 microphone)

18 MS. SHAW: The environmental studies, yes.  
19 Yes.

20 AUDIENCE MEMBER: (Unintelligible - not using  
21 microphone)

22 MS. SHAW: Prior to the public hearing. The  
23 minimal requirement is 30 days prior to the public hearing

1 and then there's a 30-day comment period.

2 MS. GARDNER: Hi, I'm Samantha Gardner. I  
3 live right against the wall on Auburn Lane and there is a  
4 line of disturbance cutting off about three-quarters of my  
5 property.

6 So my question was, if in the worst case  
7 scenario this goes through and our property needs to be  
8 taken, how do you handle relocating homeowners?

9 For example, do you pay enough that allows  
10 them to buy a house in the same neighborhood? And  
11 similarly (Unintelligible) we have neighbors who now have  
12 a (Unintelligible) or some other big construction right  
13 next door, how do you handle compensating that and what's  
14 the process?

15 MS. SHAW: So, we do not anticipate any  
16 residential relocations on this project. I'm not sure if  
17 you're looking at the limits of disturbance or what's  
18 shown on what we anticipate being the design plans.

19 You know, we keep pulling those in, but we do  
20 follow the Uniform Relocation and Assistance Act as well  
21 as our own policies. We have very prescribed processes  
22 for how we appraise property, how we assess damages and  
23 all of those types of things.

1           So I can talk with you and get in more  
2 specific detail about your situation if you'd like.

3           MS. GARDNER: Thank you.

4           MS. CRYSTAL: Hi, my name is Susan Crystal. I  
5 live in (Unintelligible) and my property backs up to the  
6 GW Parkway and no one has talked about the interface  
7 between this project on the Beltway and how it will affect  
8 the GW Parkway this evening.

9           I'm sure you've talked about it, but I  
10 wondered if you could talk a little bit about that given  
11 that I read the GW Parkway needs to be completely  
12 reconstructed, it's had two large sink holes that shutoff  
13 traffic flow recently in the last two months.

14           So, could you talk about that, please?

15           MS. SHAW: So, most of the work that we would  
16 be looking at is very close to the Beltway in terms of  
17 direct impact and how we might tie in.

18           As we've mentioned tonight, the Park Service  
19 has asked us to also look at an option without any new  
20 Express Lanes connections to the GW Parkway.

21           The Parkway themselves published an  
22 environmental assessment last summer for the pavement  
23 reconstruction, major repair work. They are working to



1 try to get a grant through their own processes because  
2 they're responsible right now for the maintenance of that  
3 facility.

4 You know, whether there would be any  
5 discussions if we added traffic connections there, there  
6 may be some further discussions with the Park about how to  
7 mitigate any type of impact and, you know, deal with --

8 AUDIENCE MEMBER: (Unintelligible - not using  
9 microphone)

10 MS. SHAW: We don't have those studies yet.  
11 That's something certainly the Park is very interested in  
12 and we are as well.

13 MS. BUTLER: Hi, I'm sorry, I'm back. I'll  
14 keep it really brief I promise. I know everybody's been  
15 bombarded all night by constant comments.

16 (Increase volume of background noise)

17 But my question is, have you guys taken into  
18 account that this project will be completed in 2045 when  
19 technological advances are probably so vast by that time,  
20 cars will be driving themselves, and no one knows what  
21 traffic patterns are going to be like with that type of  
22 car.

23 (Audience applause)

1 MS. SHAW: So, you know, we try to look into  
2 the future based on this regional land use and traffic  
3 model to at least predict, you know, what the traffic will  
4 be.

5 But I hear you, you know, nobody knows. I  
6 mean, we are saying that the project would be potentially  
7 completed by 2023. And so that's the year that we're  
8 looking at in terms of over the year.

9 What happens by 2045, you know, is anybody's  
10 guess. We do try to do that projection.

11 MS. BUTLER: Thank you.

12 MS. SHAW: All right. I'm going to stop us  
13 now and we will meet with you back at the boards.

14

15 \* \* \* \* \*

16

17 (Whereupon, at approximately 8:45 o'clock,  
18 p.m., the proceedings were concluded.)

19

20

21

22

23

## CERTIFICATE OF NOTARY PUBLIC

I, JUDY F. HENDERSON, the Verbatim Reporter before whom the foregoing comments were made, do hereby certify that the comments were taken by me stenographically and thereafter reduced to typewriting; and that I have no interest in said proceedings, financial or otherwise, nor through relationship with any of the parties in interest or their counsel.

---

JUDY F. HENDERSON  
Verbatim Reporter

# Saigon Citizens' Association

June 9, 2019

Dear Sirs:

The Saigon Citizens' Association requests a 15-foot waiver to a portion of VDOT's planned Limit of Disturbance (LOD) of the sound wall along the Outer Loop of the Beltway from 987 Spencer Road to 1010 Spencer Road, located on either side of the Swinks Mill Substation. The sound wall currently juts into Saigon at each end of the substation. This waiver would simply extend the unchanged portion of the sound wall on either side of the substation. A picture is worth a thousand words, so please see the sound wall drawn on the attached map in red.

Although we are concerned about all affected Saigon properties, we are especially concerned about 987 and 989 Spencer Road, that are 25 yards from the existing sound wall. Although we understand that current VDOT plans would not take any private property, it would move the sound wall approximately 10-15 feet "into" the neighborhood. If VDOT moves the sound wall as indicated in the May 20, 2019 public meeting, then the sound wall will be approximately 30 yards from the back of the two houses. The Saigon Citizens Association believes that property values will decrease, and our quality of life will suffer by moving the sound wall into our neighborhood. We believe that VDOT will cut down trees and leave the houses staring at a blank concrete wall. It may also increase the noise level, vibration, and degrade air and water quality. The sound wall will be underneath the high-tension electrical transmission lines.

The requested waiver would solve engineering and safety problems because VDOT could maintain a safe distance from the existing high-tension electrical transmission lines bordering the sound wall on the Outer Loop of the Beltway. VDOT would alleviate the need to encroach on the Swinks' Mill electrical substation that is an alternate energy supplier to the CIA and other government agencies.

Secondly, the Saigon Citizens Association asks that VDOT not use Saigon neighborhood as a storage area for their road building equipment. Saigon Road is an old country lane that has steep hills, hairpin turns, no shoulders or sidewalks, one street light, and deep country ditches. We have many young children and elderly people who walk or ride bicycles in the middle of the road every day. We like it that way, but it is unsafe for large construction vehicles. We do not want VDOT to rent space to park large vehicles overnight at the very end of our neighborhood.

Finally, Fairfax County has announced plans to pave an existing small wood chip trail on the Saigon side of the sound wall and expand it to a ten-foot wide asphalt trail. We are fine with the wood chip trail, but we oppose an asphalt trail because we believe it will simply encourage burglars to use motorcycles or All-Terrain Vehicles (ATVs) to burglarize our properties and make a quick getaway.

We recognize the need to increase traffic throughput on the Beltway and the American Legion Bridge, but we also wish to protect our quality of life during and after construction. Saigon is a neighborhood of 66 homes located near the outer loop of the Beltway (I-495) due south of Beaufort Park and the Georgetown Pike overpass. Saigon currently has three houses under construction and a fourth house undergoing major renovation. The median property value in Saigon is more than \$1 million in value. We wish to maintain our property values, and Virginia needs the taxes we provide.

Best Regards,



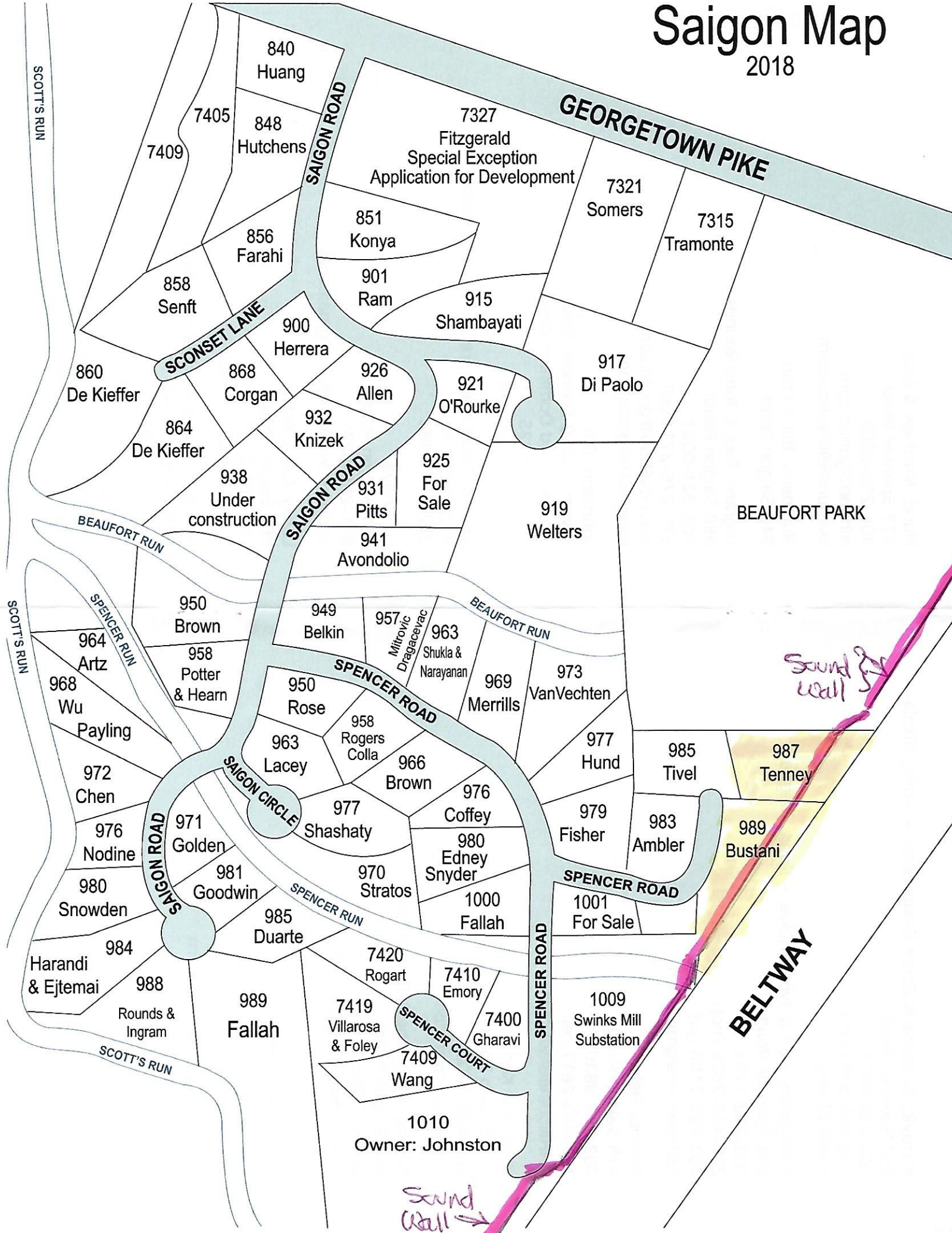
Patricia Foley  
Secretary, Saigon Citizens' Association

CC: Dranesville District Supervisor



# Saigon Map

2018



## § 1-219.1. Limitations on eminent domain

A. The right to private property being a fundamental right, the General Assembly shall not pass any law whereby private property shall be taken or damaged for public uses without just compensation. The term "public uses" mentioned in Article I, Section 11 of the Constitution of Virginia is hereby defined as to embrace only the acquisition of property where: (i) the property is taken for the possession, ownership, occupation, and enjoyment of property by the public or a public corporation; (ii) the property is taken for construction, maintenance, or operation of public facilities by public corporations or by private entities provided that there is a written agreement with a public corporation providing for use of the facility by the public; (iii) the property is taken for the creation or functioning of any public service corporation, public service company, or railroad; (iv) the property is taken for the provision of any authorized utility service by a government utility corporation; (v) the property is taken for the elimination of blight provided that the property itself is a blighted property; or (vi) the property taken is in a redevelopment or conservation area and is abandoned or the acquisition is needed to clear title where one of the owners agrees to such acquisition or the acquisition is by agreement of all the owners.

B. For purposes of this section:

"Blighted property" means any property that endangers the public health or safety in its condition at the time of the filing of the petition for condemnation and is (i) a public nuisance or (ii) an individual commercial, industrial, or residential structure or improvement that is beyond repair or unfit for human occupancy or use.

"Government utility corporation" means any county or municipality, or entity or agency thereof, which provides or operates one or more of the following authorized utility services: gas, pipeline, electric light, heat, power, water supply, sewer, telephone, or telegraph.

"Public corporation" means the Commonwealth of Virginia or any political subdivision thereof or any incorporated municipality therein or any public agency of the Commonwealth or of any political subdivision thereof or of any municipality therein.

"Public facilities" means (i) airports, landing fields, and air navigation facilities; (ii) educational facilities; (iii) flood control, bank and shore protection, watershed protection, and dams; (iv) hospital facilities; (v) judicial and court facilities; (vi) correctional facilities, including jails and penitentiaries; (vii) library facilities; (viii) military installations; (ix) parks so designated by the Commonwealth or by the locality in its comprehensive plan; (x) properties of historical significance so designated by the Commonwealth; (xi) law enforcement, fire, emergency medical, and rescue facilities; (xii) sanitary sewer, water or stormwater facilities; (xiii) transportation facilities including highways, roads, streets, and bridges, traffic signals, related easements and rights-of-way, mass transit, ports, and any components of federal, state, or local transportation facilities; (xiv) waste management facilities for hazardous, radioactive, or other waste; (xv) office facilities occupied by a public corporation; and (xvi) such other facilities that are necessary to the construction, maintenance, or operation of a public facility as listed in clauses (i) through (xv) and directly related thereto.

C. No more private property may be taken than that which is necessary to achieve the stated public use.

D. Except where property is taken (i) for the creation or functioning of a public service corporation, public service company, or railroad; (ii) for the provision of any authorized utility service by a government utility corporation; or (iii) for sanitary sewer, water or stormwater facilities, or transportation facilities, including highways, roads, streets, and bridges, traffic signals, related easements and rights-of-way, mass transit, ports, and any components of federal, state, or local transportation facilities, by a public corporation, property can only be taken where: (a) the public interest dominates the private gain and (b) the primary purpose is not private financial gain, private benefit, an increase in tax base or tax revenues, an increase in employment, or economic development.

E. During condemnation proceedings, the property owner may challenge whether the taking or damaging is for a public use, the stated public use is a pretext for an unauthorized use, or the taking or damaging of property is a violation of subsection D. Nothing in this section shall be construed as abrogating any defenses or rights otherwise available to the property owner independently of this section.

F. Subject to the provisions of subsection D, the limitations contained in this section shall not abrogate any other provision of law that authorizes a condemnor to dispose of property taken for a public use as surplus property, as otherwise provided by law.

G. If the acquisition of only part of a property would leave its owner with an uneconomic remnant, the condemnor shall offer to acquire the entire property for its fair market value as otherwise provided by law, but the condemnor shall not acquire an uneconomic remnant if the owner objects and desires to maintain ownership of the excess property.

H. The provisions of this section shall control to the extent there are any inconsistencies between this section and any other general or special law; otherwise, nothing herein shall be construed as abrogating the power of eminent domain delegated independently of this section.

I. The provisions of this section shall not apply to the forfeiture of property under Chapters 22.1 (§ [19.2-386.1](#) et seq.) and 22.2 (§ [19.2-386.15](#) et seq.) of Title 19.2.

J. The provisions of this section shall not apply to real property that is subject to a certificate of take or a certificate of deposit recorded prior to July 1, 2007, in the circuit court clerk's office for the circuit where the real property is located or real property that is the subject of a petition for condemnation filed prior to July 1, 2007.

K. For the purposes of any taking of private property in accordance with Article I, Section 11 of the Constitution of Virginia, a government utility corporation shall be considered to be acting as a public service corporation or public service company where the property is taken for the provision of an authorized utility service only; provided, however, that nothing in this subsection shall modify or affect the jurisdiction of the State Corporation Commission.

2007, cc. [882](#), [901](#), [926](#);2012, cc. [283](#), [626](#), [756](#).

The chapters of the acts of assembly referenced in the historical citation at the end of this section may not constitute a comprehensive list of such chapters and may exclude chapters whose

provisions have expired.





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SouthernEnvironment.org

July 11, 2018

Susan Shaw, P.E.  
Virginia Department of Transportation  
4975 Alliance Drive  
Fairfax, VA 22030

495NorthernExtension@vdot.virginia.gov

BY EMAIL

**RE: I-495 Express Lanes Northern Extension Study – Scoping Comments**

Dear Ms. Shaw,

On behalf of the Southern Environmental Law Center (SELC), please accept these scoping comments on the I-495 Express Lanes Northern Extension (495 NEXT) Study and the materials that were shared at the June 11, 2018 public information meeting. SELC is a non-partisan, non-profit organization that works throughout Virginia to promote transportation and land use decisions that strengthen our communities, protect our natural resources, and improve our quality of life.

We understand VDOT's interest in "connecting the dots" in the rapidly emerging express lane network in northern Virginia by extending the I-495 High Occupancy Toll (HOT) lanes north from their current terminus at the I-495/Dulles Toll Road interchange, particularly since Maryland officials are considering adding managed lanes to the full length of the Capital Beltway within that state's borders. We also recognize that HOT lanes have the potential to offer faster and more reliable travel times not only to drivers using the lanes but also to transit users and carpoolers if these crucial goals are prioritized throughout the project consideration and development process. On the other hand, HOT lanes remain an untested approach over the long term, and it is not clear that they help to shape more efficient land use or reduce vehicle miles traveled—and thus reduce greenhouse gas emissions and other air pollutants. They can also raise significant equity and environmental justice concerns. We therefore urge VDOT to use the upcoming assessment and study of this proposal as an opportunity to thoroughly vet these and other important impacts and issues, and to ensure that any project that moves forward improves transit service and reduces pollution within the study area and the broader region.

Prioritizing Transit

In order to reduce the environmental impacts of the proposal and to ensure it moves more people rather than simply more cars, its multi-modal components—and especially transit—must be prioritized. Similar to the recent Transform 66 projects for inside and outside the Beltway, this proposal should include significant funding for improving and expanding transit service in the area, such as the express bus services provided by Fairfax County and OmniRide. In addition, based on VDOT's interactive online Park and Ride map,<sup>1</sup> it does not appear there are

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<sup>1</sup> Available at <http://www.virginiadot.org/travel/parkride/home.asp>.

any Park and Ride lots along the portion of I-495 that is the focus of this project. The study should therefore consider including as part of the project the development of one or more Park and Ride lots to improve the accessibility and viability of transit service in the area. Further, assuming this project is ultimately proposed to be implemented as a public-private partnership, there should be no non-compete provision included in the agreement that could limit or prevent transit expansions and improvements in the area.

We are glad to see the Virginia Department of Rail and Public Transportation listed as one of the agency stakeholders with whom VDOT will be coordinating on the study. We urge you to also include local and regional transit operators, as they will be able to identify significant deficiencies or opportunities with the current transit network that could be addressed with toll revenue from the I-495 express lane extension project or otherwise funded as part of the project. Similarly, we urge VDOT to conduct extensive outreach to neighborhoods located within and in the vicinity of the study area for the same reason. It will also be critical for VDOT to focus closely on transit as it coordinates with the Maryland Department of Transportation (MDOT) regarding MDOT's plans for managed lanes along the Beltway, as the potential for the I-495 NEXT project to promote transit usage could be enhanced if seamless connections are provided to transit services in Maryland, including a connection to the Bus Rapid Transit network planned for Montgomery County.

#### Evaluating a Broader Array of Alternatives

We are concerned that the materials presented at the June 11 public meeting state that VDOT will only be evaluating one build alternative in the environmental assessment. Based on the adjoining segment of I-495 in Virginia that would link to this project, we assume the build alternative VDOT plans to evaluate is premised upon building four additional lanes—two in each direction—that would be tolled express lanes, while the four existing lanes would remain general purpose. We urge you to consider additional build alternatives in the environmental assessment, including: (1) reversible express lanes, and (2) adding one express lane in each direction rather than two. These approaches could potentially reduce the project's environmental impacts and cost by requiring less new pavement and land disturbance and decreasing the amount of right-of-way needed.

#### Providing a Meaningful Traffic Analysis

The June 11 meeting materials also state that VDOT will be conducting a traffic analysis and undertaking a traffic and revenue study as part of the study. We urge VDOT to ensure the traffic analysis assesses the impact the proposal would have on congestion in the general purpose lanes (including peak period travel speeds and traffic volumes) along I-495, as well as the amount of traffic diverted to adjacent roads within the study area. We also urge VDOT to provide an estimate of the range of toll amounts that drivers can expect to pay to use express lanes along this part of the highway. This information is important for determining the socio-economic impacts of the project and assessing the extent to which its costs and benefits would be felt by communities of varying income levels.

### Exceeding the Bare Minimum on Stormwater Treatment

The presentation from the June 11 meeting indicates that conceptual drainage plans and stormwater management requirements will be developed as part of the environmental assessment and its associated studies. We view the proposed expansion of this section of the highway as an excellent opportunity to improve the capture and treatment of stormwater runoff from the *existing* lanes, and we urge VDOT to apply current stormwater regulatory standards to those existing lanes as well as any new impervious surface that would be built as part of this project. This could help minimize the damage this project does to water quality—and even help improve it—in the streams and creeks that traverse the region. However, to minimize the amount of right-of-way or potential land disturbance that stormwater treatment might require, it will be important to combine the use of stormwater low-impact development strategies with measures such as underground cisterns to manage stormwater at its source and avoid the need for large detention ponds.

### Ensuring Carpoolers Have Access to Express Lanes

Finally, we understand that Maryland officials may be leaning toward requiring carpoolers to pay a fee to use the managed lane project they are considering along the Maryland portion of I-495. We strongly oppose this approach. In order to reduce air pollution and encourage fewer vehicle trips, any express lane extension Virginia implements as a result of this study should maintain the current HOT-lane approach that allows carpoolers to use the express lanes for free. And we urge Virginia officials to encourage Maryland officials to implement HOT lanes so the two states' plans will be compatible.

Thank you for your consideration of our comments. Please do not hesitate to contact me with any questions or to discuss any of these items further.

Sincerely,



Morgan Butler  
Senior Attorney



201 West Main Street, Suite 14  
Charlottesville, VA 22902-5065  
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Fax 434-977-1483  
SouthernEnvironment.org

June 10, 2019

Mr. Abi Lerner, P.E.  
VDOT Northern Virginia District  
4975 Alliance Drive  
Fairfax, VA 22030  
[495NorthernExtension@vdot.virginia.gov](mailto:495NorthernExtension@vdot.virginia.gov)

BY EMAIL

**Re: I-495 Express Lanes Northern Extension Study**

Dear Mr. Lerner,

The Southern Environmental Law Center (SELC) appreciates this opportunity to comment on the information and materials shared with the public as part of the May 20, 2019 public meeting on the I-495 Express Lanes Northern Extension project. SELC is a non-partisan, non-profit organization that works throughout Virginia to promote transportation and land use decisions that strengthen our communities, protect our natural resources, and improve our quality of life.

These comments follow up on many of the issues raised in our July 11, 2018 comment letter that we submitted as work on the Environmental Assessment (EA) for this project was just getting underway. (We have included a copy of that letter along with this correspondence.) We regret that we were unable to attend the May 20 meeting, but I appreciate you taking the time to speak with me by phone on May 2, and we have carefully reviewed the presentation and other meeting materials the Virginia Department of Transportation (VDOT) has made available on the project website. We understand that the Draft EA will not be complete until this fall, and that the purpose of the May 20 meeting was to provide updates on some of the initial findings from the environmental review and to present some preliminary design information—and not to provide all the data and conclusions on the full range of topics that VDOT will cover in the Draft EA. That said, we do have some significant concerns based on our review of the meeting materials, and we urge VDOT to address them in the Draft EA.

Evaluating Additional Build Alternatives

We first wish to note our disappointment and concern that, as best we can tell from the meeting materials, only one build alternative—consisting of adding two express lanes in each direction—has been evaluated so far. As noted in our 2018 letter, a broader array of alternative express lane configurations must be considered for this project, as Maryland is doing with its I-495 and I-270 Managed Lanes Study. We can understand why VDOT might be predisposed to simply extend the existing configuration (two express lanes in each direction), but in light of the significant roadway expansion this alternative would entail and some of the accompanying impacts



(discussed further below), we strongly urge VDOT to also evaluate configurations that use one or more reversible express lanes, and that add only one express lane in one or both directions.

Indeed, the results of the preliminary traffic analysis that were included in the May 20 meeting materials suggest there may be alternatives that could provide a similar level of traffic benefit with less roadway widening, and therefore with fewer adverse impacts. For example, Slide 14 of the May 20 meeting presentation (the only slide that provides analysis of northbound and southbound lanes) shows that projected PM peak period travel times for the general purpose lanes are significantly lower overall in the southbound direction than in the northbound direction. In addition, it shows a relatively small difference in travel times between the southbound general purpose lanes and the southbound express lanes. This information suggests less need for additional capacity in the southbound direction during the PM peak period, and a relatively small benefit for choosing the express lanes over the general purpose lanes in that same scenario. Based on this information, a reasonable question is whether two express lanes are needed in both directions at all times, highlighting the need to evaluate other build alternatives such as using reversible express lanes. We again urge VDOT to conduct a meaningful evaluation of alternative express lane configurations as part of taking the hard look at this proposal that NEPA requires.

It is also imperative to present the benefits of each alternative clearly, and the way the travel time information is presented in Slide 14 does not allow for a fair assessment of the travel time benefits that are attributable even to the one alternative that has been evaluated so far. Specifically, the travel time analysis results are conveyed for a single segment of I-495 that stretches over two miles into Maryland—well beyond the extent of the project at issue, and covering a portion of the I-495 corridor where Maryland is considering its own express/toll lane proposal that seems likely to have been factored into the travel time modeling for the No Build and the Build scenarios.<sup>1</sup> It is therefore unclear from Slide 14 the extent to which the travel time benefits it shows are due to Virginia’s I-495 proposal and are occurring in Virginia. Considering that this project is clearly intended to be “an independent, stand-alone project” (as noted in Slide 25), this information is important for accurately assessing its benefits and determining whether it could make sense to pursue other alternatives. Please make sure this information is provided in the Draft EA—for the alternative VDOT has already evaluated, and for other alternatives VDOT still needs to evaluate.

### Investing in Transit and Providing Clarity Regarding Alternative Travel Modes

We were also concerned to see that transit is hardly mentioned in the slides making up the May 20 presentation and the various meeting exhibits available online. As we emphasized in our July 11, 2018 letter, transit investments should be an integral component of this project, both to help reduce its environmental impact and to ensure a broader array of the public would benefit

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<sup>1</sup> Slide 14 shows travel times in the northbound lanes decreasing considerably in the 2045 No Build scenario as compared to existing conditions, so we assume the 2045 No Build scenario includes planned improvements to this portion of the I-495 corridor, including some form of the managed lane proposal Maryland is considering.

directly from the express lanes. We realize that transit vehicles would be able to use the express lanes, but the benefits to transit users could be greatly augmented by including direct investment in upgrading transit services in this corridor as part of the project. We continue to strongly urge VDOT to require that a significant amount of the revenues from the project be allocated to improving and expanding transit service in the area.

Although inclusion of a transit funding component may be complicated due to the project being advanced as a “concessionaire’s enhancement” under the current 495 Express Lanes agreement with Transurban, the meeting materials indicate that Transurban must submit a proposal that meets project-delivery technical and financial criteria, as well as all commitments established in the environmental study. We urge VDOT to thoroughly explore ways to incorporate into the project a requirement that a certain percentage of toll revenue or an annual lump sum be allocated to augment and expand transit service along the corridor and in the study area, similar to the transit funding allocations that were made part of the I-66 express lane projects.

Turning to additional modes, the meeting materials (specifically, Slides 18-22) indicate that pedestrian and bicycle facility improvements are being included in preliminary design concepts for the project. Although this is encouraging, it is difficult to gauge from the meeting materials the extent of these improvements or how likely they are to be included as part of the final design.

One concept appears to be constructing a ten-foot-wide shared use path behind the sound wall that would be adjacent to the southbound express lanes. However, it is unclear how far along I-495 that trail—and particularly the portion of the trail that would be constructed as part of this project—would extend. Please provide much more detail on this component of the project in the Draft EA.

Similarly, we are glad to see shared-use paths or sidewalks being factored into design concepts for the overpasses along I-495 at Old Dominion Drive, Georgetown Pike, and Live Oak Drive, but we cannot tell the extent to which pedestrian and bicycling improvements are being considered along local roadways as part of this project, as Slide 18 indicates is the case. We would appreciate any additional information VDOT can provide on these points, even in advance of publishing the Draft EA.

#### Assessing Equity and Socioeconomic Impacts

In our 2018 letter, we requested that the traffic analysis assess the impact the proposal would have on congestion in the general purpose lanes, including peak period travel speeds and traffic volumes. We explained that this information is important for determining the socio-economic impacts of the project and assessing the extent to which its costs and benefits would be felt by communities of varying income levels, including those unlikely to be able to pay the toll to use the express lanes.

We appreciate the analyses of the general purpose lanes that are provided in Slides 11 and 14. However, those slides are limited in terms of the direction and the period of time they cover. The average speed comparison graphic on Slide 11 only includes the northbound lanes, and only for the period between 2:15 and 5:15 PM, while the information on travel times in Slide 14 includes both directions but also only covers the PM peak period. We trust the traffic analysis for the EA is assessing travel speed, delay, and congestion on the general purpose lanes in both directions, and in the AM and PM peak periods, and we urge VDOT to provide that information in a clear format in the Draft EA itself (as opposed to the traffic technical report) so that the public and decision-makers will easily be able to assess more broadly the benefits of the project.

We also request VDOT to expand in the Draft EA upon the information included in Slide 13 of the meeting presentation. That slide shows the projected increases the project would have on person throughput occurring on different segments of the I-495 corridor. To allow for a better determination of the degree to which different socioeconomic classes are benefiting from the project, the information should be broken down further to show the form the projected increases in person throughput are taking. If, for example, the increases in person throughput are largely due to single-occupancy vehicles using the express lanes, it would indicate the benefit is largely accruing to those able to afford to pay the tolls. However, if a noteworthy portion of the increases in person throughput are due to increased transit ridership on the express lanes, the benefits would seem to be more socioeconomically widespread. There are other relevant reasons to provide this information: it would shed light on whether the project is likely to result in greater use of transit and carpooling along the corridor (with the corresponding benefits for the environment), or if it will simply lead to increased demand for single-occupancy driving.

We also asked in our 2018 letter for an estimate of the range of toll amounts along this section of the express lanes, as it would help determine the accessibility of the express lanes to different income levels. We do not see any toll price estimates in the information made available to date, and we therefore repeat that request in this comment letter.

#### Assessing Impacts to Parks and Historic Resources

As the “Study Area” meeting exhibit indicates, there are a number of parks located within and near the area being studied in the environmental review. They include the George Washington Memorial Parkway (GWMP) (which is also listed on the National Register of Historic Places), Scott’s Run Nature Preserve, McLean Hamlet Park, and Timberley Park. With respect to both Timberley Park and Scott’s Run Nature Preserve (and possibly the GWMP as well), the preliminary conceptual designs included with the meeting materials appear to indicate that the project’s limits of disturbance would encroach outside of VDOT’s current right-of-way and within the territory of the parks, which would constitute a “use” of parkland under Section 4(f) of the Department of Transportation Act (49 U.S.C. § 303) and, in the case of historic resources such as GWMP, could constitute an adverse impact under Section 106 of the National Historic Preservation Act (54 U.S.C. § 306108).

We see confirmation in Slide 8 that the EA will include an assessment of impacts to historic resources, but we want to emphasize the importance of the EA also assessing impacts to parkland. Further, those impacts should include not just the potential direct use of parkland, but also indirect impacts resulting from increased noise or visual intrusions—particularly from new or expanded interchanges and ramps, including any new ramps that would be built to provide access between general purpose lanes and express lanes.

It is also worth pointing out that these potential impacts to parks and historic resources reinforce our point above about the need to consider alternative express lane configurations that would not require as much widening and could thereby avoid or minimize use of parkland. Indeed, Section 4(f) prohibits the use of parkland for transportation purposes unless there is no feasible and prudent alternative (49 U.S.C. § 303(c)).


#### Prioritizing Stormwater Reduction and Treatment

This project would cross Scott's Run, which flows through Scott's Run Nature Preserve before emptying into a stretch of the Potomac River that is impaired due to excessive nutrient input. Any improvements associated with this project must be designed so that they do not exacerbate that impairment, and as noted in our July 2018 comment letter, we urge VDOT to explore capturing and treating stormwater runoff from the existing lanes of this stretch of I-495, in addition to any new impervious surface that the project would generate.

Slide 16 states that VDOT will be developing conceptual drainage and stormwater management designs using VDOT criteria IIB, but it does not indicate whether those designs target only the new impervious surface, or if they also encompass the existing pavement. We again urge VDOT to do more than the bare minimum required for stormwater treatment, while incorporating low-impact development strategies and underground cisterns to help minimize the amount of right-of-way and potential land disturbance that stormwater treatment will require.

In closing, thank you for holding the public meeting to present preliminary information and for making the meeting materials available online. We appreciate this opportunity to comment, and we ask that these comments be taken into serious consideration as VDOT continues working on the EA and assessing this project.

Sincerely,

A handwritten signature in black ink that reads "Morgan Butler". The signature is written in a cursive, slightly slanted style.

Morgan Butler  
Senior Attorney



## **Appendix D: Agency Correspondence Following EA Distribution and Public Hearing**

### Correspondence from Agencies Following Distribution of the EA

Agency/Organization	Date Received	Subject
Environmental Protection Agency	12/4/2020	EA comments
Fairfax County Park Authority	6/9/2020	Section 4(f) and 6(f)
Fairfax County Park Authority	12/4/2020	EA Comments
Fairfax County Park Authority	5/17/2021	Section 4(f) <i>de minimis</i> Concurrence
National Park Service	4/29/2020	Section 106 determination
National Park Service	10/5/2020	EA comments
National Park Service	5/6/2021	Section 4(f) <i>de minimis</i> Concurrence
Virginia Department of Cultural Resources	10/22/2020	Technical letter
Virginia Department of Historic Resources	1/14/2021	Section 106 determination



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

December 4, 2020

Ms. Abi Lerner, P.E.  
VDOT Northern Virginia District Office  
4975 Alliance Drive  
Fairfax, Virginia 22030

Re: I-495 Express Lanes Northern Extension Project Environmental Assessment, February 24, 2020, Fairfax County, Virginia

Dear Ms. Lerner:

In accordance with the National Environmental Policy Act (NEPA), Section 309 of the Clean Air Act, and the Council on Environmental Quality regulations implementing NEPA (40 CFR 1500-1508), the United States Environmental Protection Agency (EPA) has reviewed the I-495 Express Lanes Northern Extension Project Environmental Assessment (EA). The proposed improvements include extending the I-495 Express Lanes along approximately 3 miles of I-495 from the northern terminus in the vicinity of the Old Dominion Drive overpass to the George Washington Memorial Parkway in the McLean area of Fairfax County. The purpose and need are to reduce congestion, provide additional travel choices and improve reliability.

The EA evaluates a no build alternative and one build alternative that would consist of five elements including extending the I-495 Express Lanes, adding General Purpose (GP) auxiliary lanes, adding access to the Express Lane network, improving two interchanges, and reconstructing overpasses. Impacts in the proposed right-of-way include up to 19.9 acres of wetlands, 12,983 linear feet of streams, 60 acres of floodplain, 234 acres of wildlife habitat, and 148 noise receptors.

As a result of our review, EPA has identified the attached comments. Where possible, impacts to environmental and community resources associated with this project should be avoided and minimized as the project design proceeds.

Thank you for providing EPA with the opportunity to review this project. If you have questions regarding these comments, the staff contact for this project is Timothy Witman. He can be reached via email at [witman.timothy@epa.gov](mailto:witman.timothy@epa.gov) or by phone at 215-814-2775.

Sincerely,

STEPAN NEVSHEHIRLIAN Digitally signed by STEPAN NEVSHEHIRLIAN  
Date: 2020.12.03 20:26:36 -05'00'

Stepan Nevshahirlian  
Environmental Assessment Branch Chief  
Office of Communities, Tribes and  
Environmental Assessment

Enclosure

**Enclosure  
I-495 Express Lanes Northern Extension Project  
Detailed Technical Comments**

**Environmental Assessment**

*Purpose and Need*

- The recent COVID-19 pandemic has created a temporary or potentially permanent change in the travel demand and commuting with increased teleworking and shifts in the ridership of mass transit. EPA understands there is uncertainty surrounding post-COVID-19 travel demands and recommends that Virginia Department of Transportation (VDOT) continue to update and review traffic models, to the extent feasible, to ensure the travel demand for the selected alternative still exists prior to initiating construction.

**1**

*Alternatives*

- Concerning page 3-64, No Build Alternative: Effects to Natural Resources. Would the effects to the resources occur at the same rate should the no build alternative be selected or could the no build alternative slow growth/development since transportation and congestion could make the area less desirable? EPA recommends clarifying this rate of change in the EA.

**2**

- Page 3-1 describes the northern terminus. EPA suggests providing additional details concerning the interface of the Northern Extension Project with American Legion Bridge (ALB) and any forthcoming ALB construction or improvements in terms of potential impacts and logistics with the I-495/I-270 Managed Lanes Study. Since the I-495/I-270 Managed Lanes Study is still in the Draft EIS process and design drawings have not been prepared, it is important for the public to understand how the projects will tie together and the potential impacts that may have on the built and natural environment.

**3**

*Avoidance and Minimization*

- Although the report mentions avoidance and minimization measures will be implemented and a CWA 404 permit will be obtained from U.S. Army Corps of Engineers (USACE) prior to work, the documentation provided does not demonstrate compliance with the 404(b)(1) guidelines regarding avoidance and minimization. To the extent possible, EPA suggests that additional details, examples, and potential design considerations be provided that demonstrate how the project and proposed impacts may be reduced.

**4**

- Concerning page 3-36, please keep EPA apprised of the forthcoming "more detailed review" of noise barrier design selections.

**5**

- Page 3-51 reflects that the proposed project would occur in or around 94.1 acres of floodplain, of which the project may impact approximately 60 acres. As mentioned in the EA, the calculated floodplain area is expected to decrease after additional floodplain analysis is complete. In addition, the report indicates that the Build Alternative is not expected to result in an adverse impact to floodplains.

**6**

Statements from the EA do not seem to be supported by documentation or potential design considerations. EPA suggests that additional documentation be provided that supports how altering up to 60 acres of floodplain will not have an adverse effect on the floodplain.

**1** The 2018 conditions evaluated in the study are representative of typical conditions in the corridor. The current traffic conditions associated with COVID-19 are anticipated to be temporary, as compared with the ultimate design year used to design the project, which is required to be a minimum of 20 years out. Moreover, the analysis of future conditions is based on 2025 and 2045 models. Daily traffic volumes across Northern Virginia have recovered on average to approximately 80% of pre-COVID-19 volumes, and VDOT traffic data for segments of I-495 shows that daily traffic volumes have recovered to nearly 90% of pre-COVID-19 volumes. Traffic volumes are anticipated to return to pre-COVID-19 levels by the time the project is constructed and operational. In order to understand the potential impacts of reduced traffic demand on the network and the proposed project, VDOT has conducted a sensitivity analysis of impacts to traffic forecast volumes and traffic operations under a conservative scenario where impacts of COVID-19 were long-lasting into the future horizon years, with reductions in traffic volumes.

**2** The indirect and cumulative effects assessment analyzed potential changes in land use through the year 2045. This analysis concluded that the I-495 NEXT project would not induce growth because the project does not propose new access points to undeveloped land and is located within an almost completely built-out urban environment. Therefore, development patterns in the Build and No-Build Alternatives would be similar. More detail is in the *I-495 NEXT Indirect and Cumulative Effects Technical Report*.

**3** The Revised EA has been updated to include the suggested information.

**4** Limited details, examples, and potential design considerations have been provided which demonstrate how the project and proposed impacts may be reduced. More detailed information regarding avoidance and minimization would be discussed during the permitting process.

**5** EPA would continue to be updated regarding the more detailed review of noise barrier design selections that would occur during final design.

**6** The EA states that "the Build Alternative is not expected to result in an adverse impact to floodplains. The proposed project would not increase flood levels and would not increase the probability of flooding or the potential for property loss and hazard to life. Further, the proposed project would not be expected to have substantial effects on natural and beneficial floodplain values. The proposed project would be designed so as not to encourage, induce, allow, serve, support, or otherwise facilitate incompatible base floodplain development." The Revised EA clarifies that an increase in flood levels is not anticipated, but does not use the phrase "adverse impact" because impacts to floodplains are measured by a rise in the floodplain level not acres of encroachment into the floodplain. Additional data regarding floodplain modeling that was available at the time of the Revised EA was added.



- On page 3-58, approximately 70 acres of impacts are identified within the total 123 acres of estimated habitat for the wood turtle. This project could result in a loss to 57 percent of the potential wood turtle habitat within the study area. EPA suggests that the project consider further avoidance and minimization measures in wood turtle habitat to reduce impacts to potential wood turtle habitat.

7

*Wetlands and Waters of the U.S.*

- On May 8, 2020, the Norfolk District USACE published a notice regarding the Norfolk District Wetland Attribute Form. Given that a CWA 404 permit is required for this project, EPA suggests that this information be incorporated into the EA documentation.

8

- EPA suggests that, where possible, existing culvert crossings should be replaced or improved for the entire length of the crossing under the highway and not only extended where road widening occurs. Improvements should include construction of bridges or oversized culverts with natural channel bottom designs to accommodate or enhance aquatic organism passage. Consideration should be given to both aquatic and terrestrial wildlife passage.

9

- EPA recommends that the EA address how the project's alternatives conform to the Chesapeake Bay Executive Order 13508.

10

- EPA looks forward to the opportunity to continue to participate and work with you in the review and comment process as the project moves forward into the permitting phase with the USACE.

11

*Stream and Wetland Mitigation*

- Temporary impacts to resources should be thoroughly evaluated. EPA suggests that compensatory mitigation be considered for relocated streams as it will take time for the relocated streams to be restored and provide certain stream functions. In addition, monitoring should occur on all relocated streams.

12

- EPA recommends that you evaluate the lack of stream credit availability within the watershed. The lack of credit availability in this watershed could indicate that stream and wetland resources are scarce in this area. The lack of stream resources and potential mitigation should be considered in the impact analyses and proposed mitigation ratio. In addition, the lack of stream mitigation may have a connection to the cumulative effects in this area from this project which could be high, given the apparent scarcity of resources.

13

*Cumulative Effects*

- On page 3-1 of the EA, the document states that "Overall Cumulative effects are anticipated to be low since the region is already developed, protected, or development is slated to continue by the encompassing localities." Since the area is highly developed and the project is expected to enhance mobility, EPA recommends characterization of potential elevated environmental effects given the apparent reduced number of environmental resources left in the area. As proposed, this project could further reduce the limited number of resources in this area.

14

- Concerning page 3-54, EPA recommends clarifying the text in the paragraph below the table, which indicates that approximately 186.5 acres of habitat is maintained or

*Comment continued on next page*

7

Further avoidance and minimization measures in wood turtle habitat would be considered during the Section 404/401 permitting process.

8

This form would be provided with the permit application per the federal public notice regarding the Norfolk District Wetland Attribute Form published on May 8, 2020.

9

The preliminary design that has been prepared and used as the basis of the EA calculations incorporated some consideration of aquatic and terrestrial wildlife passage. Additional review of this consideration would be done during the final design process.

10

Information within the Natural Resources Technical Report (NRTR) regarding Chesapeake Bay Preservation Areas has been added to the Revised EA.

11

EPA would be invited to participate during the review and comment process as the project moves forward into the permitting phase with the USACE.

12

The project would follow all state mitigation guidelines including restoration and monitoring requirements for relocated streams. Compensatory mitigation for relocated streams would be reviewed on a case-by-case basis during the permitting process.

13

Stream credit availability would continue to be evaluated within the watershed. The EA states that if "there are not enough compensatory mitigation credits available, the remaining credits would be purchased from an approved in-lieu fee fund." Further considerations as to potential mitigation would be given during the permitting process.

14

The cumulative effects calculated based on quantitative methods were determined to be low. Revising the effect discussion to elevate the level of environmental effects would need to be a qualitative analysis, which is inconsistent with the EA's methodology.

*Comment continued from previous page*

disturbed and will be impacted. EPA suggests providing a specific breakdown of the 186.5 acres of maintained or disturbed habitat types as listed in the table above. Although these areas were previously disturbed or maintained, they may still provide some habitat functions. Additional information should be included to further document the habitat loss and considered in the cumulative effects.

**15**

*Water Quality/Stormwater*

- Concerning page 3-66, Floodplains, although the culverts and bridge may be adequately sized, EPA understands that the project could impact 60 acres of floodplain, which could bear a direct impact on the amount of flood storage capacity. EPA encourages the evaluation of feasible alternatives or mitigation.

**16**

- Concerning page 3-66, Stormwater, EPA suggests the incorporation of stormwater management technologies into the stormwater facilities and project design so that they will serve to neutralize pollution impacts. In addition, stormwater management designs should take into consideration potential extreme weather events.

**17**

- The stormwater management plan should address the proposed project areas as well as improvements to the existing stormwater management facilities along the existing roadway within the project limits.

**18**

- Concerning page 3-48, EPA suggests that additional details be provided regarding specific spill prevention and erosion and sediment control procedures to be applied from 9VAC25-880.

**19**

*Children's Environmental Health*

- Executive Order (EO) 13045 on the Protection of Children from Environmental Health Risks and Safety Risks directs that each federal agency shall make it a high priority to identify and assess environmental health and safety risks that may disproportionately affect children, and shall ensure that its policies, programs, activities, and standards address these risks. Analysis and disclosure of these potential effects under NEPA is necessary because some physiological and behavioral traits of children render them more susceptible and vulnerable than adults to health and safety risks. Children may be more vulnerable to the toxic effects of contaminants because their bodies and systems are not fully developed, and their growing organs are more easily harmed. EPA suggests identifying areas where children reside or children's facilities. The EA does not clearly describe the potential direct, indirect, and/or cumulative impacts of the project on children's health. Federal Highway Administration (FHWA) should address EO 13045. Without analysis or documentation on this topic, it cannot be assumed that there is no potential risk associated with the proposed project that may adversely affect children's health.

*Comment responses provided on next page*

*Environmental Justice*

- Concerning page 3-19, EPA recommends that additional details be included in the EA that provide more insight on partial property acquisitions in the context of the greater community and, specifically, at-risk populations. EPA has reviewed the project study area and assessed it utilizing EJSCREEN. There is at least one block group in the study area for which one or more primary EJ indexes exceeds the 80<sup>th</sup> percentile (Linguistically Isolated Households, Speak Asian-Pacific Island Languages) in the nation. Consideration should be given as to how any potential adverse effects associated with the project may

**15** Additional breakdown of the maintained/previously disturbed areas have been added to the Revised EA based on available GIS data of habitat types.

**16** The EA states that "the proposed project would not increase flood levels and would not increase the probability of flooding or the potential for property loss and hazard to life." No additional data is available.

**17** The EA states that "modern temporary and permanent stormwater management (SWM) measures, including SWM ponds, sediment basins, vegetative controls, and other measures would be implemented, in accordance with the VSMP and applicable guidance, to minimize potential degradation of water quality due to increased impervious surface and drainage alteration. These measures would reduce or detain discharge volumes and remove many pollutants before discharging into the receiving impaired water." Language has been added to describe how the stormwater management facilities would manage extreme weather events. Additional study of stormwater management options would be evaluated during final design.

**18** The stormwater management plan would take into account all existing, improved, and new stormwater facilities.

**19** Additional details have been provided in the Revised EA.



disturbed and will be impacted. EPA suggests providing a specific breakdown of the 186.5 acres of maintained or disturbed habitat types as listed in the table above. Although these areas were previously disturbed or maintained, they may still provide some habitat functions. Additional information should be included to further document the habitat loss and considered in the cumulative effects.

Comment responses provided on previous page

#### Water Quality/Stormwater

- Concerning page 3-66, Floodplains, although the culverts and bridge may be adequately sized, EPA understands that the project could impact 60 acres of floodplain, which could bear a direct impact on the amount of flood storage capacity. EPA encourages the evaluation of feasible alternatives or mitigation.
- Concerning page 3-66, Stormwater, EPA suggests the incorporation of stormwater management technologies into the stormwater facilities and project design so that they will serve to neutralize pollution impacts. In addition, stormwater management designs should take into consideration potential extreme weather events.
- The stormwater management plan should address the proposed project areas as well as improvements to the existing stormwater management facilities along the existing roadway within the project limits.
- Concerning page 3-48, EPA suggests that additional details be provided regarding specific spill prevention and erosion and sediment control procedures to be applied from 9VAC25-880.

#### Children's Environmental Health

- Executive Order (EO) 13045 on the Protection of Children from Environmental Health Risks and Safety Risks directs that each federal agency shall make it a high priority to identify and assess environmental health and safety risks that may disproportionately affect children, and shall ensure that its policies, programs, activities, and standards address these risks. Analysis and disclosure of these potential effects under NEPA is necessary because some physiological and behavioral traits of children render them more susceptible and vulnerable than adults to health and safety risks. Children may be more vulnerable to the toxic effects of contaminants because their bodies and systems are not fully developed, and their growing organs are more easily harmed. EPA suggests identifying areas where children reside or children's facilities. The EA does not clearly describe the potential direct, indirect, and/or cumulative impacts of the project on children's health. Federal Highway Administration (FHWA) should address EO 13045. Without analysis or documentation on this topic, it cannot be assumed that there is no potential risk associated with the proposed project that may adversely affect children's health.

20

#### Environmental Justice

- Concerning page 3-19, EPA recommends that additional details be included in the EA that provide more insight on partial property acquisitions in the context of the greater community and, specifically, at-risk populations. EPA has reviewed the project study area and assessed it utilizing EJSCREEN. There is at least one block group in the study area for which one or more primary EJ indexes exceeds the 80<sup>th</sup> percentile (Linguistically Isolated Households, Speak Asian-Pacific Island Languages) in the nation. Consideration should be given as to how any potential adverse effects associated with the project may

21

Comment continued on next page

**20** EO 13045 applies to federally-led projects that fall under EO 12866, which requires significant regulatory actions to be submitted for review to the Office of Information and Regulatory Affairs (OIRA) in the Office of Management and Budget (OMB). A "significant regulatory action," as defined by the executive order, "is any regulatory action that is likely to result in a rule that may have an annual effect on the economy of \$100 million or more..." The I-495 NEXT project has not been identified as a regulatory significant action, and has not been submitted for review to the OIRA.

A qualitative assessment of children's health has been performed in accordance with Executive Order 13045, Protection of Children from Environmental Health Risks and Safety Risks, which directs federal agencies to identify and assess environmental health and safety risks that may disproportionately affect children, as addressed in Sections 3.2.1 and 3.2.2 of the Revised EA. Impacts to children are considered separately because children may experience a different intensity of impact as compared to an adult exposed to the same event. The most likely locations of potential effects on children, in addition to residences, would be at schools where there are outdoor activity areas for children. Cooper Middle School and Basis Independent McLean School have outdoor activity areas and are located within the study area evaluated in the EA.

Cooper Middle School is approximately 800 feet from the existing I-495 roadway, with Balls Hill Road and the I-495 ramp to Georgetown Pike located between the school and I-495. Basis Independent McLean is a private K-12 school that is approximately 2,200 feet from the existing I-495 roadway, with the ramps from VA-267 to I-495 located between the school and I-495. Therefore, the children that attend these schools are already subjected to the air quality, noise, and traffic conditions associated with the interstate.

The impact the proposed widening of the interstate would have on these resources has been assessed in the EA (see Sections 3.10, 3.11, and 1.4 of the Revised EA respectively, as well as the associated technical reports), and where appropriate, sound barriers have been proposed. The analyses show that the proposed improvements would not exceed the national ambient air quality standards established by the EPA to protect human health and welfare, including children. Following and FHWA NEPA decision, VDOT and/or its contractor(s) would complete a final design noise analysis to determine where sound barriers are found to be reasonable and feasible. If the schools were found to require new and/or additional barriers, they would be included as part of the final design of the project.

During the public review of the EA, VDOT received comments that expressed concern about traffic patterns around Cooper Middle School during construction. Section 3.2.2 of the Revised EA provides responses to these concerns, indicating that following an FHWA NEPA decision, a maintenance of traffic plan could be developed to help ensure children's health is not disproportionately affected during the construction process.

**21** Text has been added to the EA with this assessment.

Comment continued from previous page

disproportionately impact these populations. EPA can provide assistance with research, coordination, and/or outreach concerning environmental justice.

*Air Quality*

- On page 3-32, EPA recommends that a citation to the entire transportation conformity rule (40 CFR Part 93 Subpart A) be included.

22

- On page 3-32, EPA recommends that the approval date (December 31, 2018) of the Long Range Transportation Plan from the Air Quality Technical Report be included. Also, it is recommended that the following language from the Air Quality Technical Report be added so that it is clear how the transportation conformity requirements of 40 CFR 93.114 and 93.115 are met: "The analysis demonstrated that the incremental impact of the proposed project on mobile source emissions, when added to the emissions from other past, present, and reasonably foreseeable future actions, is in conformance with the State Implementation (Air Quality) Plan (SIP) and will not cause or contribute to a new violation, increase the frequency or severity of any violation, or delay timely attainment of the National Ambient Air Quality Standards established by EPA."

23

- Please also consider including a brief explanation of how all the applicable transportation conformity requirements of 40 CFR 93.109 are met.

24

- The Air Quality section of the EA does not discuss short-term impacts of construction on air quality or mitigation measures. EPA recommends that a brief discussion of short-term air quality impacts from construction activity be included in the EA. Also, please include a discussion of the mitigation measures included in the Air Quality Technical Report as well as the commitment that all construction activities will be performed in accordance with VDOT Road and Bridge Specifications.

25

*Other*

- Concerning page 3-61, EPA suggests that a brief description be provided regarding how medium or high priority sites may be addressed if contamination is present onsite.

26

- EPA suggests that the project team continue to work with the appropriate state and federal agencies regarding listed species of concern and any construction restrictions for aquatic, avian, or other species.

27

- Concerning page 3-25, EPA recommends that additional details be included that provide greater context for impacts to roughly 3 acres within Scott's Run Nature Preserve (e.g., details about the preserve itself and anticipated changes).

28

- Concerning page 3-58, it would be helpful to elaborate on the criteria, process, and outcomes that would be "considered" in construction impacting endangered species.

29

22 Citation has been added to Section 3.10.2.

23 Text has been added as requested to Section 3.10.2. The final approval date (March 2020) is referenced rather than the initial approval date (December 2018).

24 Text has been added to Section 3.10.2.

25 Text has been added to Section 3.10.2. The Air Quality Technical Report's reference to construction impacts and mitigation has been supplemented with additional detail.

26 Additional explanation of appropriate next steps has been added.

27 The project team would continue to coordinate with appropriate state and federal agencies regarding listed species of concern during the permitting process.

28 Additional information is in the Section 6(f) discussion (Section 3.9) and the *I-495 NEXT Section 4(f) and 6(f) Technical Memorandum*, which is also included as Appendix A of the EA. Reference has been added in the Section 4(f) discussion to direct readers to the other locations for more detail.

29 Existing language from the *I-495 NEXT Natural Resources Technical Report* regarding potential processes during construction to reduce impacts to threatened and endangered species has been added to the Revised EA.



**Air Quality Technical Report**

- EPA recommends explaining that the transportation conformity requirements of 40 CFR Part 90 Subpart A apply to the project since it is located in a nonattainment area for the 2015 ozone NAAQS. Also, please briefly explain how the applicable transportation conformity requirements of 40 CFR 93.109(b) are met for the project.

**30**

**Natural Resources Technical Report**

- On page 7, under CWA 303(d), Dead Run is listed as “impaired” due to an impaired macroinvertebrate community and the Potomac is listed as impaired due to excess nutrient and sediment inputs. The build alternative includes the use of stormwater management features to minimize potential degradation of water quality due to increased impervious surface and drainage alteration. EPA suggests that stormwater Best Management Practice options be implemented not only to the discharge point to the impaired waters, but also in all discharge points and drainages to tributaries that discharge to the Potomac River (such as Scott’s Run) to minimize potential degradation and improve water quality.

**31**

- Concerning page 12, EPA recommends that depending on the extent of the temporary impacts, compensatory mitigation should be considered if the temporary impacts will affect the functions and services of the stream or wetland system that may require months or years for restoration.

**32**

**30** Text was in the Executive Summary of the tech report, and has been added to Section 2.2 of the tech report.

**31** These recommendations would be considered during the final design phase and, if added to the project, would be incorporated into the permit application package.

**32** The project would follow Virginia Water Protection rules and guidelines for restoration and monitoring of temporary impact areas.



## FAIRFAX COUNTY PARK AUTHORITY

12055 Government Center Parkway, Suite 927 • Fairfax, VA 22035-5500  
703-324-8700 • Fax: 703-324-3974 • [www.fairfaxcounty.gov/parks](http://www.fairfaxcounty.gov/parks)

June 19, 2020

Abraham Lerner, P.E.  
VDOT Special Project Development Associate Manager  
Virginia Department of Transportation  
4975 Alliance Drive  
Fairfax, VA 22030

Dear Mr. Lerner,

The Fairfax County Park Authority (FCPA) has reviewed your DRAFT Section 4(f); Significance Determination, Temporary Occupancy, and *DE MINIMUS* letter, dated February 6, 2020, for the I-495 Express Lanes Northern Extension (I-495 NEXT) Project. This project is proposing to extend the Interstate 495 (I-495) Express Lanes for approximately three (3) miles from the I-495/Dulles Toll Road interchange to the George Washington Memorial Parkway (GWMP) in the McLean area of Fairfax County. Planning level estimates indicate that the proposed design for this project will require temporary grading and construction easements and permanent fee simple acquisition on portions of Scotts Run Nature Preserve (the Preserve), a property protected under Section 4(f) of the Department of Transportation Act of 1966.

The Preserve, previously identified as the Burling Tract, was purchased by the Fairfax County Board of Supervisors, and later transferred to FCPA, with assistance from the Land and Water Conservation Fund (LWCF). According to the Virginia Department of Conservation and Recreation (DCR), "Section 6(f)(3) of the Land & Water Conservation Fund Act of 1965, as amended, requires that property acquired or developed with LWCF assistance shall be retained and used for public outdoor recreation in perpetuity. Any property so acquired and/or developed shall not be wholly or partly converted to other than public outdoor recreation uses without the approval of NPS pursuant to Section 6(f)(3) of the LWCF Act."

FCPA appreciates that the VDOT project team has initiated coordination with FCPA staff in the early stages of this project. The attached document outlines several key factors regarding the land conversion and replacement process governed by Section 6(f) of the LWCF Act as well as specific mitigation and minimization measures to reach Section 4(f) de minimus concurrence. As further engineering and design demonstrates any additional park impacts and land takings, additional studies and concurrences may be necessary. FCPA staff is committed to work with VDOT staff and its project partners to keep this important project on schedule with the understanding that the project team will continue to coordinate with FCPA throughout the project design and construction.



If accommodations and/or alternative formats are needed, please call (703) 324-8563, at least 10 working days in advance of the registration deadline or event. TTY VA Relay 711.

The staff contact for this project is Elizabeth Iannetta, Infrastructure Coordinator, who can be reached at (703) 324-8725 or [Elizabeth.Iannetta@fairfaxcounty.gov](mailto:Elizabeth.Iannetta@fairfaxcounty.gov). We look forward to working with you as this project progresses.

Sincerely,

A handwritten signature in black ink, appearing to read "Kirk Kincannon". The signature is written in a cursive style and is positioned above the printed name.

Kirk Kincannon,  
Executive Director

Attachment 1: Section 6(f) of the LWCF Act & Section 4(f) Mitigation & Minimization Recommendations

Copy: Aimee L. Vosper, Deputy Director/CBD, Acting Director, Resource Management Division (RMD)  
Sara Baldwin, Deputy Director/COO  
David R. Bowden, P.E., Director, Planning and Development Division (PDD)  
Anna Bentley, Manager, Park Planning Branch, PDD  
Andrea Dorlester, Development Review Section Chief, Park Planning Branch, PDD  
Elizabeth Iannetta, Infrastructure Coordinator, Park Planning Branch, PDD  
Cindy McNeal, P.E., Land Acquisition & Management Branch, PDD  
John Burke, Manager, Natural Resources Branch, RMD  
Liz Crowell, Manager, Archaeology & Collections Branch, RMD  
Dan Sutherland, Manager, Grounds Management, Park Operations Division (POD)  
Robert Iosco, Virginia MegaProject, VDOT



## Attachment 1

### I-495 Express Lanes Northern Extension (I-495 NEXT) Project Section 6(f) of the LWCF Act & Section 4(f) Mitigation & Minimization Recommendations

#### Background:

The United States Department of the Interior (USDOI), Bureau of Outdoor Recreation, approved Project Proposal 51-00053, dated August 17, 1970, for the acquisition of approximately 336 acres of land that was identified as the Burling Tract, with the Land and Water Conservation Fund (LWCF). The Burling Tract was purchased by the Fairfax County Board of Supervisors (BOS), the deed was recorded in Deed Book 3343 at Page 532 on September 4, 1970. The BOS transferred the land to Fairfax County Park Authority (FCPA) as recorded in Deed Book 12327 at Page 2170 on October 29, 2001. The Burling Tract includes what is now FCPA Scotts Run Nature Preserve, Tax Map #21-1((1))3, which will be impacted by the VDOT Project.

- According to the Virginia Department of Conservation and Recreation (DCR), "Section 6(f)(3) of the Land & Water Conservation Fund Act of 1965, (LWCF) as amended, requires that property acquired or developed with LWCF assistance shall be retained and used for public outdoor recreation in perpetuity. Any property so acquired and/or developed shall not be wholly or partly converted to other than public outdoor recreation uses without the approval of NPS pursuant to Section 6(f)(3) of the LWCF Act."
- VDOT's project impacts will require a LWCF land conversion. VDOT will need to coordinate the administrative and public processes for the land conversion process with FCPA, DCR, and NPS.
- DCR and the National Park Service (NPS) will need to review and approve any conversion and the suitability of substitute lands that would be acquired to offset the conversion.
- VDOT will need to coordinate the land conversion process timeline with the project schedule.

The Park Authority requires any adverse impacts to these resources by VDOT and/or its project partners follow FCPA Policy 201 titled Natural Resources (<http://www.fairfaxcounty.gov/parks/parkpolicy/park-policy-manual.pdf>) and the agency-wide Natural Resource Management Plan, recommended action number eight (<http://www.fairfaxcounty.gov/parks/resource-management/downloads/nrmp012914.pdf>). VDOT and/or its project partners will need to agree to rehabilitate any temporary impacts to natural resources to Park Authority standards and mitigate/compensate for permanent impacts to natural resources on Park Authority managed lands. This requirement applies to any natural resource impact (terrestrial or aquatic) that is not regulated under the jurisdiction of any federal or state agency. Total impacts and mitigation/compensation costs will be determined upon completion of the site design.

Scott's Run Nature Preserve has several significant resources that would be impacted by this project. The ecological community impacted by this effort has been classified as Mesic Mixed Hardwood Forest. The area that would be most impacted by this project scored an 11.5 out of 16 in the Non-Native Assessment and Prioritization survey. This categorization makes the area a high priority for active management. It has been treated for invasive plants for several years to maintain ecological integrity.

- Scotts Run Nature Preserve will experience direct impacts of lost parkland, vegetation, habitat and increased storm water discharge, invasive species as well as wildlife impacts. Therefore, we would like to review all future documents and plans as the project progresses.

1

1

VDOT commits to providing FCPA design plans to review as the project progresses through the design-build process following an FHWA NEPA decision. VDOT expects these plans to be reviewed within three weeks of submittal.



- VDOT shall agree to rehabilitate any temporary impacts to natural resources to Park Authority standards and mitigate/compensate for permanent impacts to natural resources on Park Authority managed lands. This requirement shall apply to any natural resource impact (terrestrial or aquatic) that is not regulated under the jurisdiction of any federal or state agency.
- The Park Authority defines permanent impact as any habitat type conversion, for example, forest to grassland, and temporary impact as replacement of the same habitat type or better, for example, grassland to grassland.
- Mitigation/compensation for permanent impacts shall be determined using the Fairfax County Land Development Services 2020 Unit Price Schedule to determine a replacement cost. Forest, woodland, and shrubland habitat types shall be mitigated/compensated for at \$61,049 an acre, and grassland shall be mitigated/compensated for at \$14,520 an acre. Total impacts and mitigation/compensation costs shall be determined upon completion of the site design.
- The FCPA requests the results of any endangered species surveys conducted in preparation to or as part of this project.
- VDOT will stabilize areas within the construction footprint within Scott's Run Nature Preserve using a native seed mix as specified by the FCPA. Once construction is complete, FCPA will rehabilitate these areas to the habitat type. VDOT will compensate FCPA to design, install and maintain these rehabilitated areas for up to three (3) years.
- Any impacts that extend beyond the Limits of Disturbance (LOD), including root and branch pruning, must follow Policy 201 for Natural Resources or be mitigated/compensated for.
- The subject area was subjected to cultural resources review. Since the project requires Federal permitting and may include Federal funding, it would trigger Section 106, requiring VDOT to consult with Virginia Department of Historic Resources by Federal Regulation.
- FCPA recommends any areas with ground disturbance throughout the project corridor that are not previously surveyed, undergo Phase I archaeological survey. If sites are found that are potentially significant to the history of Fairfax County, or potentially eligible for inclusion onto the National Register of Historic Places they should undergo Phase II archaeological testing. If sites are found significant or eligible, avoidance or Phase III data recovery is recommended.
- In addition, Site 44FX2430, which is located within the LOD on the Scotts Run Nature Preserve property, may be impacted. FCPA recommends avoidance of the site. If the site cannot be avoided, FCPA further recommends Phase II archaeological testing. If the site is found significant or eligible, Phase III data recovery is recommended.
- Depending on the final scope of the work, staff recommends the removal of spoils from offsite dumping of debris, then at the end of the project have VEPCO secure their easement access with a gate or other barrier type feature to eliminate future offsite dumping on parkland.

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The Virginia Department of Environmental Quality (VDEQ) and U.S. Army Corps of Engineers (USACOE) would determine mitigation of aquatic resources through their joint permitting process.

VDOT agrees to return any areas with temporary construction impacts on FCPA land to its pre-construction condition (like to like).

VDOT agrees to mitigate/compensate for permanent impacts to natural resources on FCPA managed lands. This requirement shall apply to any natural resource impact {terrestrial or aquatic} that is not regulated under the jurisdiction of any federal or state agency.

Noted.

VDOT commits to mitigation/compensation for impacts to those areas outside of the required replacement land area. The permanent fee take area would be compensated with replacement land.

This information is included in the Environmental Assessment. It is assumed that following the FHWA NEPA decision, the project would advance with a more detailed design and permitting. The permitting process would require additional T&E database searches and this information would be made public as part of the Joint Permit Application (JPA).

VDOT would stabilize the construction footprint with native seed mix. Once construction is complete, VDOT would rehabilitate these areas to the habitat type based on whether it is a temporary or permanent impact. VDOT would compensate FCPA to design, install and maintain these rehabilitated areas for up to three (3) years.

After the final NEPA determination, VDOT and/or the Design-Builder can advance with more detailed design to determine final impacts. The Design-Build Team would be required to follow FCPA Manual Policy 201. FCPA Manual Policy 201 would also be referenced in the technical requirements for the project.

The Virginia Department of Historic Resources concurred with VDOT's determination of "No adverse effect" for I-495 NEXT Project on April 8, 2020 followed by the National Park Service on October 20, 2020 and the SHPO on January 21, 2021. The Technical Requirements in the RFP include the LOD as a design constraint. Any design changes that extend beyond the LOD that was previously coordinated would require further consultation with VDHR and other consulting parties.

- VDOT shall agree to rehabilitate any temporary impacts to natural resources to Park Authority standards and mitigate/compensate for permanent impacts to natural resources on Park Authority managed lands. This requirement shall apply to any natural resource impact (terrestrial or aquatic) that is not regulated under the jurisdiction of any federal or state agency.
- The Park Authority defines permanent impact as any habitat type conversion, for example, forest to grassland, and temporary impact as replacement of the same habitat type or better, for example, grassland to grassland.
- Mitigation/compensation for permanent impacts shall be determined using the Fairfax County Land Development Services 2020 Unit Price Schedule to determine a replacement cost. Forest, woodland, and shrubland habitat types shall be mitigated/compensated for at \$61,049 an acre, and grassland shall be mitigated/compensated for at \$14,520 an acre. Total impacts and mitigation/compensation costs shall be determined upon completion of the site design.
- The FCPA requests the results of any endangered species surveys conducted in preparation to or as part of this project.
- VDOT will stabilize areas within the construction footprint within Scott's Run Nature Preserve using a native seed mix as specified by the FCPA. Once construction is complete, FCPA will rehabilitate these areas to the habitat type. VDOT will compensate FCPA to design, install and maintain these rehabilitated areas for up to three (3) years.
- Any impacts that extend beyond the Limits of Disturbance (LOD), including root and branch pruning, must follow Policy 201 for Natural Resources or be mitigated/compensated for.
- The subject area was subjected to cultural resources review. Since the project requires Federal permitting and may include Federal funding, it would trigger Section 106, requiring VDOT to consult with Virginia Department of Historic Resources by Federal Regulation.

FCPA recommends any areas with ground disturbance throughout the project corridor that are not previously surveyed, undergo Phase I archaeological survey. If sites are found that are potentially significant to the history of Fairfax County, or potentially eligible for inclusion onto the National Register of Historic Places they should undergo Phase II archaeological testing. If sites are found significant or eligible, avoidance or Phase III data recovery is recommended.

In addition, Site 44FX2430, which is located within the LOD on the Scotts Run Nature Preserve property, may be impacted. FCPA recommends avoidance of the site. If the site cannot be avoided, FCPA further recommends Phase II archaeological testing. If the site is found significant or eligible, Phase III data recovery is recommended.

Depending on the final scope of the work, staff recommends the removal of spoils from offsite dumping of debris, then at the end of the project have VEPCO secure their easement access with a gate or other barrier type feature to eliminate future offsite dumping on parkland.

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VDOT has completed a Phase I Archaeological Survey and no archaeological sites that are eligible for or listed on the NRHP were identified within the APE. This review included local, state and federal sites within the Area of Potential Effect. A Phase II is not required. The Virginia Department of Historic Resources concurred with VDOT's effect determination on April 8, 2020, the National Park Service concurred on October 20, 2020, and the SHPO concurred on January 21, 2021.

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The I-495 NEXT project would not impact Site 44FX2430. Site 44FX2430 is not located within the I-495 NEXT LOD, which comprises the APE for Direct Effects. The Virginia Department of Historic Resources concurred with VDOT's effect determination on April 8, 2020, the National Park Service concurred on October 20, 2020, and the SHPO concurred on January 21, 2021.

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Noted. VDOT is working with Dominion to address this issue.





# FAIRFAX COUNTY PARK AUTHORITY



December 4, 2020

Mr. Abi Lerner, P.E.  
Virginia Department of Transportation  
4975 Alliance Drive  
Fairfax, VA 22030

Subject: I-495 Express Lanes Northern Extension (NEXT) Project  
Design Public Hearing & Environmental Assessment Comments  
State Project Number: 0495-029-419, P101  
UPC Number: 113414  
Federal Project Number: NHPP-495-5(095)

Dear Mr. Lerner,

The Fairfax County Park Authority (FCPA) has reviewed the public hearing plans and the Environmental Impact Assessment for the I-495 Express Lanes Northern Extension (NEXT) project. We offer the following comments and recommended mitigations to reduce any potential impacts related to lost land, vegetation and habitat, increased stormwater discharge, invasive species, cultural resources, and wildlife quality impacts.

**Acquisition of Parkland:**

The United States Department of the Interior (USDO), Bureau of Outdoor Recreation, approved Project Proposal 51-00053, dated August 17, 1970, for the acquisition of approximately 336 acres of land that was identified as the Burling Tract, with the Land and Water Conservation Fund (LWCF). The Burling Tract was purchased by the Fairfax County Board of Supervisors (BOS), the deed was recorded in Deed Book 3343 at Page 532 on September 4, 1970. The BOS transferred the land to FCPA as recorded in Deed Book 12327 at Page 2170 on October 29, 2001. The Burling Tract includes what is now FCPA Scotts Run Nature Preserve, Tax Map #21-1((1))3, which will be impacted by the VDOT Project. VDOT's Project impacts will likely require a LWCF land conversion process and will be subject to approval by the National Park Service (NPS).

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**Cultural Resources:**

Park Authority staff has conducted archival cultural resources review for the above referenced project. The Environmental Assessment report made no mention of the cultural resource site, 44FX2430, specifically. It only mentioned that any sites within the area of impact contained no sites that were eligible, or potentially eligible for inclusion onto the National Register of Historic Places. After re-checking the current Virginia Department of Historic Resources (VDHR) status of 44FX2430, however, the site has NOT been evaluated. Therefore, it is recommended that if the site will be impacted, a Phase

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Comment continued on next page

12055 Government Center Parkway  
Fairfax, VA 22035-5500  
www.fairfaxcounty.gov/parks  
@fairfaxparks

For Inclusion and ADA Support,  
call (703) 324-8563.  
TTY: Va Relay 711

**1** As noted in Section 3.9 of the EA, the Scott's Run Nature Preserve was developed with money from the Land and Water Conservation Fund, and therefore is afforded additional protection under Section 6(f) of the Land and Water Conservation Fund Act of 1965 (Public Law 88-578). The Preserve is operated by the FCPA, and VDOT has coordinated with FCPA since inception of the project. Detail about the potential Section 6(f) impacts, the coordination process, and anticipated mitigation measures is in the I-495 NEXT Section 4(f) and 6(f) Technical Memorandum, which is also included as Appendix A of the EA. Updated details on the disposition of the Section 6(f) coordination with FCPA and National Park Service, as well as with the Virginia Department of Conservation and Recreation, since the EA was published are provided in the Revised EA and Section 4(f) and 6(f) Technical Memo.

**2** Within the Area of Potential Effect (APE), pedestrian surveys and shovel testing were performed in an effort to identify historic archaeological resources. Based on these survey efforts, four archaeological sites were found adjacent to the LOD but would not be impacted by the I-495 NEXT Project. The results of the archaeological survey efforts are summarized further in the *Cultural Resources Survey Report*. The Virginia Department of Historic Resources (VDHR) confirmed on April 7, 2020 that none of the archaeological findings meet eligibility criteria set for listing in the NRHP and no further work associated with archaeological resources is necessary. This information has been included in the Revised Environmental Assessment.

The *Cultural Resources Survey Report*, appended by reference to the EA, noted that Site 44FX2430 had been identified in a 1999 cultural resources survey, and had been recommended as potentially eligible to the National Register of Historic Places (NRHP). Site 44FX2430 was adjacent to, but not within, the Archaeological APE for the I-495 NEXT project. Since the site is outside of the Archaeological APE, no impacts are anticipated. Therefore, no additional surveys were conducted as part of the I-495 NEXT study. If the LOD shifts during final design so that impacts are possible to Site 44FX2430, additional surveys would be conducted.

If study is necessary to determine county significance or eligibility for National Register of Historic Places (NRHP) status. If found significant or eligible, avoidance, or Phase III data recovery is recommended as mitigation.

In addition, any areas with ground disturbance throughout the project corridor that are not previously surveyed, should undergo Phase I archaeological survey. If sites are found that are potentially significant to the history of Fairfax County, or potentially eligible for inclusion onto the National Register of Historic Places they should undergo Phase II archaeological testing. If sites are found significant or eligible, avoidance or Phase III data recovery is recommended.

**Natural Resources:**

All development on Park Authority property must comply with its Policy 201, Natural Resources, and agency-wide Natural Resource Management Plan (NRMP). Of note is Section 7 of the NRMP:

- a. Avoid adverse impacts to natural areas, mitigate unavoidable impacts from construction and maintenance projects and require restoration and rehabilitation of impacted natural resources.
  - i. Minimize impacts to forests, meadows and other natural areas from human use.
  - ii. Protect significant natural communities and species.
  - iii. Require restoration of impacted natural resources when use of parkland causes damage to them.

If impacts cannot be avoided, staff requests a design that minimizes impacts and a mitigation plan for any losses, which should be coordinated with the Park Authority. This mitigation plan will need to clarify the extent of construction that will occur on Park Authority property as well as the impacts to natural resources.

Scotts Run Nature Preserve will experience direct impacts of lost parkland, vegetation, and habitat; increased storm water discharge; invasive species; and wildlife impacts. The ecological community impacted by this effort has been classified as Mesic Mixed Hardwood Forest. The area that would be most impacted by this project scored an 11.5 out of 16 in the Non-Native Assessment and Prioritization survey. This categorization makes the area a high priority for active management. It has been treated for invasive plants for several years to maintain ecological integrity.

The Park Authority recommends rehabilitation for any temporary impacts to natural resources to Park Authority standards and mitigation/compensation for permanent impacts to natural resources on Park Authority managed lands. This requirement shall apply to any natural resource impact (terrestrial or aquatic) that is not regulated under the jurisdiction of any federal or state agency.

The Park Authority defines permanent impact as any habitat type conversion, for example, forest to grassland, and temporary impact as replacement of the same habitat type or better, for example, grassland to grassland.

Mitigation/compensation for permanent impacts shall be determined using the Fairfax County Land Development Services 2020 Unit Price Schedule to determine a replacement cost. Forest, woodland, and shrubland habitat types shall be mitigated/compensated for at \$61,049 an acre, and grassland shall be mitigated/compensated for at \$14,520 an acre. Total impacts and mitigation/compensation costs shall be determined upon completion of the site design.

Due to the proximity to parkland, staff requests the use of only common native species including perennials and seed mixes on this project since non-native species either do not fare as well as natives or are invasive, negatively impacting the environmental health of Park Authority property. The Park

Response to these comments are on the previous page

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Response to these comments are on the next page

**3** VDOT will meet the requirements of Section 4(f) and Section 6(f) for potential park impacts associated with the project, which are consistent with the criteria of Policy 201 and NRMP Section 7. Scott's Run Nature Preserve is the only park owned by the Fairfax County Park Authority (FCPA) that is within the LOD, and therefore is anticipated to be impacted. Two other parks — Timberly Park and McLean Hamlet Park — are within the study area, but not within the LOD, as described in Section 3.8.1 of the EA. Based on the preliminary design, approximately 4.11 acres of the Preserve are within the LOD, with approximately 1.10 acres anticipated to be permanent impacts and 3.01 acres anticipated to be temporary easements (these updated impact numbers are in the Revised EA). Since the Preserve is a publicly owned and publicly accessible recreational area, it is protected under Section 4(f). In addition, since the Preserve was developed with money from the Land and Water Conservation Fund (LWCF), it is also protected under Section 6(f). VDOT and FHWA have coordinated with FCPA during the preliminary planning and design phase, and will continue to do so during final design regarding impacts, minimization measures, and mitigation measures as part of the Section 4(f) and Section 6(f) processes. Impacts, coordination efforts, and conclusions are summarized in the EA and detailed in the *Section 4(f) and 6(f) Technical Memorandum*, included in Appendix A of the EA. Both of these documents have been revised and will be circulated publicly in early 2021, to include updated efforts since the EA was completed.



If study is necessary to determine county significance or eligibility for National Register of Historic Places (NRHP) status. If found significant or eligible, avoidance, or Phase III data recovery is recommended as mitigation.

In addition, any areas with ground disturbance throughout the project corridor that are not previously surveyed, should undergo Phase I archaeological survey. If sites are found that are potentially significant to the history of Fairfax County, or potentially eligible for inclusion onto the National Register of Historic Places they should undergo Phase II archaeological testing. If sites are found significant or eligible, avoidance or Phase III data recovery is recommended.

Natural Resources:

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- a. Avoid adverse impacts to natural areas, mitigate unavoidable impacts from construction and maintenance projects and require restoration and rehabilitation of impacted natural resources.
  - i. Minimize impacts to forests, meadows and other natural areas from human use.
  - ii. Protect significant natural communities and species.
  - iii. Require restoration of impacted natural resources when use of parkland causes damage to them.

If impacts cannot be avoided, staff requests a design that minimizes impacts and a mitigation plan for any losses, which should be coordinated with the Park Authority. This mitigation plan will need to clarify the extent of construction that will occur on Park Authority property as well as the impacts to natural resources.

Scotts Run Nature Preserve will experience direct impacts of lost parkland, vegetation, and habitat; increased storm water discharge; invasive species; and wildlife impacts. The ecological community impacted by this effort has been classified as Mesic Mixed Hardwood Forest. The area that would be most impacted by this project scored an 11.5 out of 16 in the Non-Native Assessment and Prioritization survey. This categorization makes the area a high priority for active management. It has been treated for invasive plants for several years to maintain ecological integrity.

The Park Authority recommends rehabilitation for any temporary impacts to natural resources to Park Authority standards and mitigation/compensation for permanent impacts to natural resources on Park Authority managed lands. This requirement shall apply to any natural resource impact (terrestrial or aquatic) that is not regulated under the jurisdiction of any federal or state agency.

The Park Authority defines permanent impact as any habitat type conversion, for example, forest to grassland, and temporary impact as replacement of the same habitat type or better, for example, grassland to grassland.

Mitigation/compensation for permanent impacts shall be determined using the Fairfax County Land Development Services 2020 Unit Price Schedule to determine a replacement cost. Forest, woodland, and shrubland habitat types shall be mitigated/compensated for at \$61,049 an acre, and grassland shall be mitigated/compensated for at \$14,520 an acre. Total impacts and mitigation/compensation costs shall be determined upon completion of the site design.

Due to the proximity to parkland, staff requests the use of only common native species including perennials and seed mixes on this project since non-native species either do not fare as well as natives or are invasive, negatively impacting the environmental health of Park Authority property. The Park

Response to  
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comments  
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4 VDOT has completed an extensive study of existing human and natural resources and evaluated opportunities to avoid or minimize impacts to resources such as Scott's Run Nature Preserve, as documented in the EA and supporting technical reports. VDOT is engaged in ongoing coordination with the Fairfax County Park Authority regarding impacts to Scott's Run Nature Preserve, and will continue working with the Virginia Department of Conservation and Recreation (VDCR), US Corps of Engineers, Virginia Department of Environmental Quality (VDEQ), and other agencies during final design and the permitting process to further minimize impacts as the design is refined. Other elements that would be completed during the final design, such as development of a landscaping plan and permitting, would provide additional information to the public and local agencies about anticipated impacts and mitigation measures.

The results of the preliminary threatened and endangered species review, performed using the Virginia Department of Wildlife Resources' (VDWR) database, are presented in the 495 NEXT Natural Resources Technical Report and summarized in the February 2020 EA. This list has recently been expanded upon, in coordination with the National Park Service, and has been updated in the Revised EA and Natural Resources Technical Report that are anticipated to be published in Spring 2021.

The project would include restoration of temporary impacts to park land and a revegetation program to replace trees lost due to the construction of the project where feasible. VDOT has provided a detailed response to the separate letter from the Park Authority indicating a commitment to coordinate on acceptable mitigation for temporary impacts and compensation for permanent impacts.

Mitigation measures proposed for Scott's Run Nature Preserve are summarized in the Section 4(f) and 6(f) Technical Memorandum (Appendix A of the EA), and include the following:

- Avoid impacts to the recreational use of the property
- Stabilize areas of land disturbance using a native seed mix as specified by Fairfax County Park Authority
- Minimize potential encroachment by staying within utility easement to the extent possible
- Include connections between the Preserve and the proposed 3.1-mile, 10-foot-wide shared use path, consistent with the County's Trails Plan Map

Additional mitigation measures developed through ongoing coordination with FCPA have been included in the Revised EA.

Authority requests that the applicant utilize common plant species generally native to Fairfax County, including trees, perennials, and seed mixes, to provide the greatest ecosystem benefit.

The Park Authority requests the results of any endangered species surveys conducted in preparation for or as part of this project.

The Park Authority recommends stabilization of areas within the construction footprint within Scott's Run Nature Preserve using a native seed mix as specified by the FCPA. Once construction is complete, FCPA will rehabilitate these areas to the habitat type. VDOT will compensate FCPA to design, install and maintain these rehabilitated areas for up to three (3) years.

In addition, any impacts that extend beyond the Limits of Disturbance (LOD), including root and branch pruning, must follow Policy 201 for Natural Resources or be mitigated/compensated for.

Staff has reviewed the Environmental Assessment and has several recommended edits and/or corrections that pertain to description of parkland, habitat classification, migratory bird, bat, and forest dwelling species impacts, and the inclusion of the Potomac Heritage National Scenic Trail within the project limits.

1. "Langley Oaks Park, and Scott's Run Nature Preserve are natural areas identified within or in close proximity to the study area which feature a mix of natural lands and recreational facilities (Fairfax County, 2019c). Parks owned by the Fairfax County Park Authority (FCPA) or NPS can be seen in Figure 3-11. There are no wildlife refuges within or in close proximity to the study area."

**Comment:** This is an inaccurate depiction of Scotts Run Nature Preserve, which has been preserved for wildlife habitat. There are no facilities in this park aside from trails.

2. The upland habitat of Scotts Run Nature Preserve is predominantly high-quality Northern Coastal Plain/Piedmont Mesic Mixed Hardwood Forest (Natural Heritage EO\_ID 10284).

3. Migratory Bird Treaty Act

**Comment:** Why are migratory birds that nest in forested habitat not being considered? The report only mentions species that nest under bridges.

4. Scotts Run Nature Preserve has not been surveyed for reproducing bats or for potential maternity colonies, therefore it is possible that maternity roosts could be present within the study area. This includes Northern Long-eared bat, Tricolored bat and Little Brown bat.

5. "Migratory Bird Species After consulting the VDGIF VaFWIS species list it was determined that there are no confirmed occurrences of migratory bird species on the Migratory Bird Treaty Act list of protected migratory species within the study area."

**Comment:** This statement is incorrect. Please include forest-dwelling species in this assessment. There are numerous migratory bird species nesting within forests within the project area.

6. "Northern Long-eared Bat: No confirmed maternity roosts or hibernacula are located within a two-mile radius of the study area (VDGIF, 2019g)"

Response to this comment is on the next page

Response to these comments are on the previous page

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5 For purposes of compliance with Section 4(f) of the US Department of Transportation Act, VDOT and FHWA have determined that the trails located within the Scott's Run Nature Preserve will be considered recreational resources in considering the potential impacts of the I-495 NEXT project. The *I-495 NEXT Section 4(f)/6(f) Technical Memorandum* describes Scott's Run Nature Preserve in more detail, including the following description: "The Scott's Run Nature Preserve is predominantly made up of natural woods, bluffs, and hiking trails. The recreational activities within the Scott's Run Nature Preserve include walking, hiking, bird watching, wildlife viewing, educational programming, and other similar activities."

6 The *I-495 NEXT Natural Resources Technical Report* summarizes habitat type (e.g., forest, turfgrass) within the study area. As shown in Figure 3-11 of the report, Scott's Run Nature Preserve within the study area is entirely comprised of a forest/tree land cover type.

7 Based on an evaluation of listed threatened and endangered species, there are no federally-protected or state listed bird species within the Limits of Disturbance (LOD). There are no confirmed occurrences of birds on the Migratory Bird Treaty Act list of protected migratory species within the study area. While there may be nesting locations for hawks, owls, and Great Blue Herons near or within the LOD, these species are not protected. Potential impacts to protected species would be updated during the permit process, and would be based on the most current lists of federally-protected and state listed species. Conservation and protection measures for protected migratory bird species would be in accordance with federal regulations and guidelines, including additional coordination with the US Fish and Wildlife Service Virginia Field Office prior to construction.

8 As noted in the *I-495 NEXT Natural Resources Technical Report*, "the study area is not within the vicinity of any known Northern Long-Eared Bat (NLEB) hibernacula or maternity roosts, with the nearest hibernaculum located 86.5 miles away. However, suitable summer habitat for the NLEB is present throughout the study area. The study area is not within the vicinity of any known Little Brown Bat or Tri-Colored Bat hibernacula or maternity roosts, and therefore, per VDWR protocols, no habitat assessment is required for these bat species, and incidental take of these species is not anticipated." Conservation and protection measures for protected bat species would be in accordance with federal regulations and guidelines, including additional coordination with the US Fish and Wildlife Service Virginia Field Office prior to construction.

9 See response to Comment #7.



*This comment is continued  
from the previous page*

**Comment:** A mist-netting survey should be conducted to determine the presence or absence of bat maternity roosts within Scotts Run Nature Preserve, for all three species of interest (Northern Long-eared Bat, Tricolored Bat, Little Brown Bat).

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7. *"Migratory Birds—There are no confirmed observations of migratory birds within the study area; therefore, there are no suspected impacts to these species. The Migratory Bird Treaty Act states that it is illegal to capture, kill or hurt any migratory bird, nest or egg. If a migratory bird is observed during construction in the study area, further coordination with USFWS may be required."*

11

**Comment:** This statement is incorrect. Please include forest-dwelling species in this assessment. There are numerous migratory bird species nesting within forests within the project area.

**Project Design & Construction:**

Depending on the final scope of the work, staff recommends the removal of spoils from offsite dumping of debris. At the end of the project have VEPCO secure their easement access with a gate or other barrier type feature to eliminate future offsite dumping on parkland.

12

The potential extension of noise walls on/near Scotts Run Nature Preserve / Live Oak Drive will need further discussion as the design progresses.

13

**Trails & Connectivity:**

The Park Authority recommends pedestrian facilities be constructed on both sides of the Georgetown Pike overpass to provide adequate access to Scotts Run Nature Preserve to minimize the number of unsignalized crossings of Georgetown Pike as possible.

14

The Park Authority supports the continuation of the proposed pedestrian/bicycle facilities heading north along Balls Hill Road and continuing to the American Legion Bridge for future connectivity into Maryland.

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Sincerely,

  
Stephanie Leedom, Division Director,  
Park Planning & Development

eCopy: Aimee Vosper, Deputy Director/CBD

Liz Crowell, Manager, Archaeology & Collections Branch

John Burke, Manager, Natural Resources Branch

Dan Sutherland, Manager, Grounds Management, Park Operations Division

Elizabeth Iannetta, Trails & Infrastructure Coordinator, Park Planning Branch

Cindy McNeal, Project Coordinator, Real Estate Services Branch

Alex Burdick, Senior Engineer, Real Estate Services Branch

Anna Bentley, Manager, Park Planning Branch

Andrea Dorlester, Development Review Section Chief, Park Planning Branch

Lynne Johnson, Planning Tech, Park Planning Branch

**10** As noted in Section 3.16.1 of the EA, the VaFWIS report identified documented occurrences of the little brown bat and tri-colored bat within a two-mile radius of the study area. While no documented occurrences of the northern long-eared bat (NLEB) were identified in the VDWR VaFWIS report, the study area is within the range of this species. Suitable summer habitat is present throughout the study area for all three bat species. Since the study area is not within the vicinity of any known hibernacula or maternity roosts, per VDWR protocols, no habitat assessment — including techniques such as a mist-netting survey — is required for these bat species, and incidental take of these species is not prohibited. As described in Section 3.16.2 of the EA, although incidental take of the little brown bat and tri-colored bat is not anticipated, prior to construction, additional coordination would be undertaken with VDWR to identify any conservation measures to minimize impacts to these species. Conservation and protection measures for the NLEB would be in accordance with the Final 4(d) Rule and the Programmatic Biological Assessment for Transportation Projects in the Range of the NLEB, including additional coordination with the US Fish and Wildlife Service Virginia Field Office prior to construction.

**11** See response to Comment #7.

**12** Should spoils be found within the proposed limits of disturbance, the Design-Builder will be required to properly dispose of such spoils in accordance with federal, state, and local laws. The comment regarding a barrier to eliminate future offsite dumping is noted. VDOT is working with Dominion Power to address this issue.

**13** The Design-Builder will be responsible for developing the Final Noise Analysis in accordance with federal and state policies, and with respect to the final design. The results of the final noise analysis will be shared with the County at that future date.

**14** In response to comments from the public received following the I-495 NEXT Design and Location Public Hearing held in October 2020, the typical section of the Georgetown Pike bridge over I-495 was modified. The original concept proposed a 99-foot wide bridge that included a 10-foot wide shared use path on the south side of the bridge, adjacent to the eastbound lanes of Georgetown Pike. The shared use path would be separated from the vehicular travel lanes by a concrete barrier and railing. The revised design widens the bridge to 105.5 feet in order to supplement the shared use path on the south side of the bridge with a 6-foot wide sidewalk at the back of curb on the north side of the bridge. At the request of the Fairfax County Park Authority, a new trail segment was added in the northwest quadrant of the interchange between the southbound off-ramp and Linganore Road, in order to connect the proposed north side sidewalk with the existing trail between Linganore Road and the Scotts Run Nature Preserve entrance.

**15** The I-495 NEXT project's proposed shared use path would be paved up to Live Oak Drive; beyond that, grading for a future trail connection to GWMP would extend to the proposed on-ramp from I-495 to the GWMP in the 2025 Interim Year design (prior to Maryland's separate Managed Lane project being open). The shared use path parallel to I-495 would then be extended further to the north across the ALMB in a later phase, with the assumption that the bridge will be improved as part of Maryland's separate Managed Lane project.

Mr. Abi Lerner, P.E.  
I-495 Express Lanes Northern Extension Project; UPC 113414  
Design Public Hearing & Environmental Assessment Comments  
Page 5

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# FAIRFAX COUNTY PARK AUTHORITY



May 12, 2021

Abraham Lerner, P.E.  
VDOT Special Project Development Associate Manager  
Virginia Department of Transportation  
4975 Alliance Drive  
Fairfax, VA 22030

Subject: I-495 Express Lanes Northern Extension (Project NEXT)  
State Project Number: 0495-029-419, P101  
UPC Number: 113414  
From: Dulles Toll Road (Route 267) Interchange  
To: George Washington Memorial Parkway Interchange  
**SECTION 4(f); SIGNIFICANCE DETERMINATION, TEMPORARY OCCUPANCY, AND  
*DE MINIMIS* IMPACTS**

Dear Mr. Lerner,

The Fairfax County Park Authority (FCPA) has received your Section 4(f); Significance Determination, Temporary Occupancy, and *DE MINIMUS* letter, dated March 25, 2021, for the I-495 Express Lanes Northern Extension (NEXT) Project. This project proposes to extend the I-495 Express Lanes for approximately three (3) miles from the Dulles Toll Road Interchange to the George Washington Memorial parkway in the McLean area of Fairfax County. Planning level estimates indicate that the proposed design for the project will require a temporary grading and construction easement not to exceed 3.01 acres, and permanent fee simple incorporation of up to approximately 1.10 acres of the Scotts Run Nature Preserve, a property protected under Section 4(f) of the Department of Transportation Act of 1966 as delineated in Attachment 1. Your letter requests FCPA's concurrence that the proposed project would not adversely affect activities, features, and attributes of the Scotts Run Nature Preserve (the Preserve), owned by the FCPA.

The Preserve was purchased by the Fairfax County Board of Supervisors, and later transferred to FCPA, with assistance from the Land and Water Conservation Fund (LWCF). According to the Virginia Department of Conservation and Recreation (DCR), "Section 6(f)(3) of the Land & Water Conservation Fund Act of 1965, as amended, requires that property acquired or developed with LWCF assistance shall be retained and used for public outdoor recreation in perpetuity. Any property so acquired and/or developed shall not be wholly or partly converted to other than public outdoor recreation uses without the approval of NPS pursuant to Section 6(f)(3) of the LWCF Act." While this letter is primarily a response to the VDOT's Section 4(f) request letter, FCPA will continue to coordinate with the project team on the required Section 6(f) replacement land process and procedure as noted on Attachment 3, "Proposed Mitigation and Minimization," Bullet 5.



Mr. Abraham Lerner, P.E.  
I-495 Express Lanes Northern Extension (Project NEXT); UPC Number 113414  
Page 2

The FCPA appreciates that VDOT staff has worked closely with FCPA staff to reach 4(f) de minimis concurrence under Section 4(f) of the Department of Transportation Act of 1966 for the I-495 NEXT Project. Based on VDOT's assurance to utilize FCPA's specified mitigation as stated in your request dated March 25, 2021, the executed Section 4(f) concurrence regarding De Minimis Impacts on FCPA Parklands and the Proposed Mitigations and Minimizations is attached. These documents have been amended with clarifications and corrections as discussed with VDOT staff in recent weeks. These edits are noted as underlined text in Attachments 2 and 3. As further engineering and design demonstrate any additional park impacts and land takings, additional studies and concurrences may be necessary. Costs associated with all land acquisitions including temporary and permanent easements and takings will need to be negotiated at a later date, separate from this Section 4(f) concurrence. FCPA staff is committed to work with VDOT staff to keep this important project on schedule with the understanding that VDOT will continue to coordinate with FCPA during project design and construction.

The staff contact for this project is Elizabeth Iannetta, Infrastructure Project Coordinator, who can be reached at 703-324-8725 or [Elizabeth.Iannetta@fairfaxcounty.gov](mailto:Elizabeth.Iannetta@fairfaxcounty.gov). We look forward to working with you as this project progresses.

Sincerely,

DocuSigned by:

*Sara Baldwin*

66B05FAA5613421...  
Sara Baldwin

Acting Executive Director/COO

- Attachment 1: Scotts Run Nature Preserve Impact Area
- Attachment 2: FCPA Section 4(f) Signature Block (as amended)
- Attachment 3: Proposed Mitigation and Minimization
- Attachment 4: Proposed Trail Network Connecting to Scotts Run Nature Preserve

eCopy: Aimee Vosper, Deputy Director/CBD

Stephanie Leedom, Director, Park Planning & Development Division, PDD  
Anna Bentley, Manager, Park Planning Branch, PDD  
Andrea Dorlester, Development Review Section Chief, Park Planning Branch, PDD  
Elizabeth Iannetta, Trails & Infrastructure Coordinator, Park Planning Branch, PDD  
Cindy McNeal, Project Coordinator, Real Estate Services Branch, PDD  
Lynne Johnson, Planning Tech, Park Planning Branch, PDD  
John Burke, Manager, Natural Resources Branch, RMD  
Erin Stocksclaeder, Natural Resources Branch, RMD  
Liz Crowell, Manager, Archaeology & Collections Branch, RMD  
Dan Sutherland, Manager, Grounds Management, Park Operations Division  
Wayne Brissey, Area 6 Manager, Park Operations Division  
John Callow, Manager, Scotts Run Nature Preserve, RMD  
John Simkins, FHWA  
Susan Shaw, P.E., VDOT  
Scott Smizik, VDOT  
Martha Coello, FCDOT

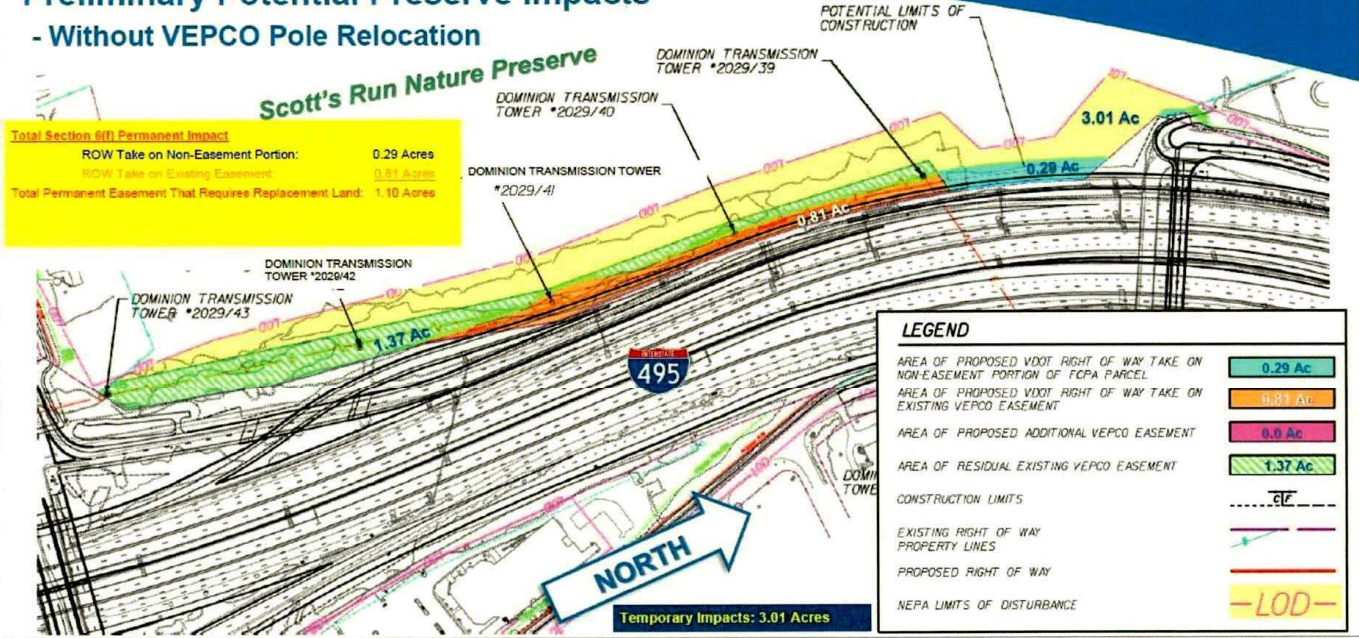
Mr. Abraham Lerner, P.E.  
I-495 Express Lanes Northern Extension (Project NEXT); UPC Number 113414  
Page 3

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TysonsToMd-ALL-FILES\Section 4(f) Correspondence\I-495 Project NEXT  
Section 4(f) FCPA.docx

# Preliminary Potential Preserve Impacts - Without VEPCO Pole Relocation

## Scott's Run Nature Preserve

**Total Section 6(f) Permanent Impact**  
 ROW Take on Non-Easement Portion: 0.29 Acres  
 ROW Take on Existing Easement: 0.81 Acres  
 Total Permanent Easement That Requires Replacement Land: 1.10 Acres





**Fairfax County Park Authority Significance Determination, Temporary Occupancy, and Final Concurrence with the Section 4(f) Applicability Criteria for *de minimis* Impact to Scotts Run Nature Preserve**

For the proposed northern extension of Interstate 495 (VDOT Project #0495-029-419, P101, UPC #113414) from the current northern terminus of the existing Express Lanes in the vicinity of the Old Dominion Drive overpass to the George Washington Memorial Parkway (GWMP) in the McLean area of Fairfax County, Virginia, the Fairfax County Park Authority (FCPA) has determined that the Scotts Run Nature Preserve (Preserve) is a significant property in their system. FCPA concurs that the temporary occupancy of 3.01 acres for grading and construction is minor and will not cause permanently adverse physical impacts to, nor interfere with the protected activities, features, or attributes of the Preserve that qualify it for protection under Section 4(f), either on a temporary or permanent basis. FCPA further concurs that the fee simple right-of-way acquisition of approximately 1.10 acres of property will not permanently adversely affect the Preserve, as the majority of the fee simple acquisition is co-located with an existing overhead Dominion Energy transmission line that is within an existing easement. FCPA further concurs that, based upon current design information and the commitment on the part of VDOT to mitigate and minimize disturbance within the Preserve, subject to the conditions attached to this concurrence document and incorporated as Attachment 3, impacts to Preserve property that could be expected to result from the project will not adversely affect activities, features, or attributes of the Preserve. FCPA hereby acknowledges that VDOT provided notice and opportunity for public review and comment, consistent with federal guidelines. This concurrence does not constitute an endorsement of the project or conveyance of any temporary or permanent interests in or access to the Preserve. This concurrence is provided with the understanding that further design information is to be provided to FCPA by VDOT during project development and that further consultation with FCPA will be undertaken by VDOT to ensure prior to granting of any temporary or permanent property interests that harm to park property by the proposed project will be minimized and the conditions upon which this concurrence is based have not changed.

DocuSigned by:

*Sara Baldwin*

66B0BFAA5613421...

Signature

05/17/2021

Date

Sara Baldwin

Printed Name

Acting Executive Director/COO, FCPA

Title

## ATTACHMENT 3

### PROPOSED MITIGATION AND MINIMIZATION

VDOT will adhere to the following minimization efforts and mitigation measures for the Scott's Run Nature Preserve:

- VDOT will avoid impacts to the recreational use of the property so that the project will not adversely affect activities, features, or attributes of the Scott's Run Nature Preserve.
- VDOT will minimize potential encroachment into Scott's Run Nature Preserve by staying within utility easement, to the extent possible, within the boundaries of the Scott's Run Nature Preserve.
- VDOT commits to providing FCPA design plans to review as the project progresses through the Design-Build process following completion of the NEPA process. VDOT expects these plans to be reviewed by the FCPA within three weeks of submittal.
- VDOT agrees to return any areas with temporary construction impacts on FCPA land to its pre-construction condition (like to like).
- VDOT commits to mitigation/compensation for impacts to those areas outside of the required replacement land area. The permanent fee simple area will be compensated with replacement land.
- VDOT agrees to mitigate/compensate for permanent impacts to natural resources on FCPA managed lands. This requirement shall apply to any natural resource impact (terrestrial or aquatic) that is not regulated under the jurisdiction of any federal or state agency.
- VDOT will stabilize the construction footprint with native seed mix. Once construction is complete, FCPA will rehabilitate these areas to the habitat type based on whether it is a temporary or permanent impact. VDOT will compensate FCPA to design, install and maintain these rehabilitated areas for up to three (3) years.
- The Design-Build Team will be required to follow FCPA Policy Manual guidance. FCPA Policy 201: Natural and Cultural Resources will also be referenced in the Technical Requirements of the Design Build Request for Proposals for the project.
- The Technical Requirements of the Design-Build Request for Proposals will include the LOD as a design constraint. Any design changes that extend beyond the LOD that was previously coordinated will require further consultation with the SHPO (VDHR), the OWJ, FHWA, and other consulting parties as necessary.
- As part of the overall design for the I-495 NEXT project design, the Build Alternative includes an approximately 3.1-mile, 10-foot-wide shared use path, consistent with the Fairfax County Countywide Trails Plan Map (FCDPD 2018) that would provide improved local access to the Scott's Run Nature Preserve trail system (see Attachment 4). The path is proposed to begin near the south end of the project corridor at Timberly Lane near Lewinsville Road and continue north along the west side of I-495 behind the proposed noise barrier. The path would also have a connection to existing and proposed bicycle and pedestrian facilities along Georgetown Pike, tying in just west of the Georgetown Pike interchange. The path is proposed to then cross I-495 on the south side of the proposed Georgetown Pike bridge and turn north at the Balls Hill Road intersection where it would continue along the west side of Balls Hill Road to the GWMP interchange. The northern

## ATTACHMENT 3

limits of the path would be constructed so that it may connect in the future to a proposed pedestrian crossing of the Potomac River adjacent to the ALMB. The path would also provide access to the widened sidewalk on the new Live Oak Drive bridge where it crosses I-495 (just south of the GWMP interchange) and provide a connection to the trail system in Scott's Run Nature Preserve as well as the Potomac Heritage Trail.

- In order to provide a seamless connection between the proposed shared use path and Scott's Run Nature Preserve, VDOT will construct the following sidewalk and trail connections as part of the Build Alternative:
  - A new sidewalk along Georgetown Pike (north side) between the I-495 interchange and Linganore Drive will be constructed, connecting with the existing trail that leads to the main entrance of the preserve.
  - The Georgetown Pike Bridge will be widened, and a new sidewalk will be constructed on the north side of the I-495 Bridge and extend beyond the bridge to Balls Hill Road as well as to the I-495 proposed shared use path as described above.
  - Crosswalks will be constructed to connect to the I-495 proposed shared use path and new sidewalks on both sides of I-495, providing improved options for pedestrians and bicyclists to gain access to the existing trail west of Linagnore Drive leading to Scott's Run Nature Preserve.



### Recreational Trails and Bicycle Facilities within the Study Area







Recreational Trails and Bicycle Facilities near the Scotts Run Nature Preserve







# United States Department of the Interior



NATIONAL PARK SERVICE  
George Washington Memorial Parkway  
700 George Washington Memorial Parkway  
McLean, VA 22101

IN REPLY REFER TO:

## 1.A.1 (GWMP)

Ms. Sarah M. Clarke  
Environmental Program Planner  
Commonwealth of Virginia  
Department of Transportation  
1401 East Broad Street  
Richmond, Virginia 23219-2000

Dear Ms. Clarke:

We are writing in reference to your March 17, 2020, Determination of Effect letter to the Virginia of Department of Historic Resources (VDHR) regarding the Virginia Department of Transportation (VDOT) proposed project to improve the I-495 corridor between the Dulles Toll Road and the George Washington Memorial Parkway interchange in the vicinity of the American Legion Bridge (I-495 NEXT). In this letter VDOT requested VDHR's review and concurrence to a No Adverse Effect determination for impacts on historic properties that fall within the project's revised Area of Potential Effect (APE) related to the I-495 NEXT project in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended. The National Park Service (NPS) serves as a consulting party for this project due to the effects of the project on the George Washington Memorial Parkway (GWMP) and was copied on this letter.

The NPS has reviewed the project based on the information that was provided during a February 6, 2020, meeting and represented in a Visualizations Booklet with updated content provided on February 25, 2020.

The NPS concurs with VDOT's No Adverse Effect determination for the I-495 NEXT project provided that VDOT selects design option 1 (no retaining wall on NPS property), further minimizes the loss of forest, and mitigates the loss of forest. While option 1 provides the best solution to eliminating the introduction of new infrastructure design elements on NPS lands, option 1 has the greatest effect on the mature forest canopy, understory, and herbaceous plant community. The forest is a character defining feature for the GWMP, and the loss may never fully recover due to present day influences of invasive vegetation, difficulty in adapting to climate change, and lack of ecosystem resiliency even after replanting efforts. To minimize the loss of forest at this entrance to the GWMP, NPS would like VDOT to the extent possible reduce forest loss on their property as well as consider a different treatment of the walls on VDOT property. This would further diminish the effects of the project within this area, develop a harmonious transition of wall/barrier types complementary to the GWMP, and provide an appropriate entry experience for drivers approaching the Parkway from the Beltway.

1

The NPS will provide further comment on the project through our review of the Environmental Assessment (EA) which is currently out for public review. We are very interested in what VDOT hears from the public regarding the alternatives that are include in the EA. Since the current COVID-19 pandemic has extended VDOTs process we look forward to hearing VDOTs plan to engage the public and further refine alternatives.

2

We look forward to working with you and the rest of the VDOT team in refining the design to minimize and mitigate the impacts to the Parkway's historic landscape as this project progresses. If you have any questions or need additional information, you can contact either Matthew Virta, Cultural Resources

**1** The VDOT design team worked closely with the NPS and consulting parties in order to develop a project that considers the setting and feeling of the GWMP. The goal behind the design is to minimize the visual and physical impact to the GWMP, while incorporating elements of design that creates a gateway entrance to the GWMP off I-495. Early in the Section 106 process, the NPS stated that a design clearly identifying the GWMP to drivers exiting I-495 was preferred. To meet this request, the design consultant presented a *George Washington Memorial Parkway Visualization Booklet* (the Booklet) at the February 6, 2020 consulting parties meeting. VDOT maintains that the design options presented in the Booklet minimize the effect of the I-495 NEXT project to the GWMP. While the proposed project may alter the setting and feeling of the GWMP, the project does not diminish any aspects of integrity that contribute to the significance of the resource. The VDOT presented the NPS an opportunity to review and comment on the four design options presented in the Booklet.

In an attempt to support the no adverse effect determination for the I-495 NEXT project, VDOT shall commit to the following conditions. The VDOT shall utilize Option 1, as described in the Booklet, at the entrance to the GWMP off I-495. The landscaping completed for the project shall meet NPS standards and specifications, apply the minimization and mitigations efforts requested by the NPS, as well as incorporate the results of the tree survey already completed for this project. VDOT shall consult with the NPS and consulting parties to ensure that the NPS-selected gateway design concept would avoid any adverse effects to the GWMP. VDOT shall develop a major milestones design review schedule in consultation with the Virginia SHPO, the NPS and other consulting parties. The major milestones design review schedule shall include at least two interim submissions for review.

The implementing regulations of Section 106 of the NHPA define an effect as an "alteration to the characteristics of a historic property qualifying it for inclusion in or eligible for the National Register" [36CFR800.16 (i)]. The effect is adverse only when the alteration of a qualifying characteristic occurs in a "manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association" [36CFR800.5 (a)]. VDOT Cultural Resources staff have reviewed the plans for this project, which reflect VDOT's concerted efforts to minimize and avoid impacts to historic properties, as documented in part by the Booklet, and have determined that the project as proposed will alter but not diminish the integrity of historic properties within the project's APE. As such, VDOT has determined that the revised design of the I-495 NEXT Project would have No Adverse Effect on historic properties in accordance with 36 CFR 800.5(b), provided that conditions are imposed and implemented to avoid adverse effects on the GWMP (VDHR No.: 029-0228) and the Dead Run Ridges Archaeological District (44FX3922), as well as its contributing resources Archaeological Sites 44FX0374, 44FX0379, 44FX0389, and 44FX2430 (see discussion above and concurrence page). The Virginia Department of Historic Resources (DHR) has concurred with VDOT's determination of No Adverse Effect.

**2** VDOT has held three public meetings, two question and answer sessions for the general public, two public hearings, 23 meetings with elected officials, 109 meetings with stakeholders and agencies, 22 meetings with homeowners associations, and 22 one-on-one meetings with property owners. The materials have been available online and in hard copy in several locations since February 2020, and the project team has been available for questions and comments via phone throughout the planning and design process. These public involvement opportunities exceed both FHWA and VDOT policies for this type of NEPA study. VDOT has developed a Revised EA based on comments from the public, NPS, and other agencies.

Program Manager via email at matthew\_virta@nps.gov or phone at 202-439-7323 or Maureen Joseph, Chief of Resource Management, via email at maureen\_joseph@nps.gov or phone 202-734-0932.

Sincerely,

**Charles** Date:  
**Cuvelier** 2020.04.29  
08:30:23  
-04'00'

Charles Cuvelier  
Superintendent

cc:

VDOT – W. Moore  
VDOT – A. Lerner  
MD-SHA – S. Archer  
VA-DHR – M. Holma  
NPS-NCA - T. Stidham  
NPS-GWMP – M. Joseph





# United States Department of the Interior

NATIONAL PARK SERVICE  
George Washington Memorial Parkway  
c/o Turkey Run Park  
McLean, Virginia 22101

IN REPLY REFER TO:

C3821 (3301)

October 5, 2020

Abi Learner, P.E.  
VDOT Northern Virginia District Office  
4975 Alliance Drive  
Fairfax, VA 22030

Re: NPS Comments on 495 Express Lanes Northern Extension Project Environmental Assessment

Dear Mr. Lerner,

The National Park Service (NPS) has reviewed the Virginia Department of Transportation (VDOT) I-495 Express Lanes Northern Extension Environmental Assessment (EA), which evaluates an extension of the Interstate 495 (I-495) Express Lanes along approximately three miles of I-495, also referred to as the Capital Beltway, from their current northern terminus in the vicinity of the Old Dominion Drive overpass to the George Washington Memorial Parkway (Parkway) in the McLean area of Fairfax County, Virginia. The purpose of the project is to reduce congestion, provide additional travel choices and improve travel reliability by extending the I-495 Express Lanes from the existing terminus of the I-495 Express Lanes to the Parkway interchange in the vicinity of the American Legion Bridge. The proposed improvements entail new and reconfigured express lane ramps and general-purpose lane ramps at the Dulles Interchange and tie-in connections to the Route 123/I-495 interchange. Because of the project's impacts to the Parkway, the NPS is serving as a cooperating agency on this project and has been coordinating with VDOT and offers the following general comments with detailed comments attached.

The Build alternative includes modifications to the I-495/Parkway interchange to allow for express lane access from I-495 to and from the Parkway. VDOT will need to acquire use of NPS property through Highway Easement Deed (HED). The amount of area required is yet to be determined and will necessitate a survey prior to the completion of the EA decision document and Final Section 4(f) Evaluation. The area from which the easement would be acquired abuts the existing GWMP eastbound lanes and incorporates the removal of vegetation necessary for the construction of the tie-in and fly-over ramps (located outside the GWMP boundary) associated with the I-495 NEXT Project. Additionally, in various locations along the existing GWMP, VDOT proposes to add new express lane tolling signage. VDOT has determined that the Build Alternative would require the permanent and temporary use of land from the Parkway and has proposed the impacts under Section 4(f) (23 CFR 774.17) as de minimis. At this time, the NPS cannot concur as this does not constitute a final determination by VDOT. The Final Section



4(f) Evaluation will need to be submitted to the Department of Interior for review once a final determination has been made.

The VDOT has determined under Section 106 of the National Historic Preservation Act a determination of No Adverse Effect with the concurrence of the Virginia State Historic Preservation Officer. The NPS concurred with VDOT's No Adverse Effect determination for the project in correspondence on April 29, 2020, provided that VDOT selected design option 1 (no retaining wall on NPS property), and further minimizes the loss of forest, and mitigates the loss of forest. While option 1 provides the best solution to eliminating the introduction of new infrastructure design elements on NPS lands, option 1 has the greatest effect on mature forest canopy understory, and herbaceous plant community. Vistas and viewsheds are among the most significant features of the Parkway, framed by mature forest canopy understory, and herbaceous plant community. The forest is a character defining feature for the Parkway and the loss may never fully recover due to present day influences of invasive vegetation, difficulty in adapting to climate change, and lack of ecosystem resiliency even after replanting efforts. To further minimize the loss of forest at this entrance to the Parkway, the NPS would like VDOT to explore reducing the forest loss on their property. In addition, the NPS recommends a different wall treatment on VDOT property, which complements the Parkway architecture. These two changes would create an appropriate entry experience for drivers approaching the Parkway from the Beltway and would protect the character of this historic resource.

We appreciate the on-going coordination with the VDOT project team. This collaboration has led to a significant reduction in impacts to the Parkway from the original alternatives explored. This process should continue as the design progresses and through the completion of the EA to further avoid and minimize impacts to the Parkway. This project will require the NPS to issue a permit and to work with VDOT and Federal Highway Administration in the development of a HED. These actions will require the NPS to adopt this EA and develop a NPS Finding of No Significant Impact.

We look forward to our work with the VDOT team in continuing to refine the design to further minimize and mitigate the impacts to the Parkway's historic landscape as this project progresses. If you have any questions or need additional information, you can contact Maureen Joseph, GWMP Chief of Resource Management, at [maureen\\_joseph@nps.gov](mailto:maureen_joseph@nps.gov) or 202-734-0932.

Sincerely,

**Charles** Date:  
**Cuvelier** 2020.10.05  
13:31:49 -04'00'

Charles Cuvelier  
Superintendent

Attachment: NPS Comments on EA

**I-495 VDOT Express Lane Extension Environmental Assessment  
NPS Comment Tracking**

ID	Reviewer	Page	Section	NPS Comment	VDOT Response (1/11/21)	NPS Review 1/20/2021
1	NPS	General	EA	Clearly articulate the nature of the GWMP as a National Park Service unit especially in the introductory section and Section 3. NPS has a federal action and will adopt this EA as our own NEPA document so there should be language included that emphasizes the national importance of the GWMP.	Comment accepted; language will be added. In addition, NPS comments throughout will be addressed to allow NPS adoption of the EA. VDOT project NEPA team will coordinate with FHWA and NPS to update and issue a Revised EA to allow NPS to adopt the document.	NPS agrees
2	NPS	General	Mapping	Graphically depict the NPS lands differently than other parklands and open spaces. This EA will be adopted by NPS so it's important the lands are graphically depicted separately.	Comment accepted; figures will be revised to show NPS lands as distinct from other lands.	NPS agrees
3	NPS	General	EA	The resources impacted, limit of disturbance and no other mention of existing utilities infrastructure facilities. The study area and EA should mention the 230Kv power transmission line (Dominion 2029) along the wooded area where trees are anticipated to be impacted.	Comment partially accepted; while a detailed description of utilities will not be added within the study area because final design has not been completed, the utilities within the protected areas will be referenced to address comment.	NPS agrees
4	NPS	General	EA	Include in the introduction a discussion of the expected revenue for the P3 partner over time and how it will be shared with those who have been impacted by the construction on public land.	Comment partially accepted; the EA will be revised to note that there will be a P3 partner. Impacts to public land are mitigated and compensated in accordance with federal and state requirements through established processes and procedures. Virginia law restricts the use of toll revenue to uses that are reasonably related to or benefit the users of the toll facility.	NPS agrees
5	NPS	General	EA	Potomac Heritage Trail Designation - Please note that the official name of this trail is "Potomac Heritage National Scenic Trail". The evolving PHT network is managed by various governmental agencies and nonprofit organizations.	Comment accepted; text will be modified.	NPS agrees
6	NPS	General	General	In order for NPS to adopt this EA, somewhere in chapter 3 the park-specific impacts to GWMP need to be called out specifically	Comment accepted; text will be modified throughout Chapter 3.	Comment addressed
7	NPS	1-1	1.1	Need to mention within the project limits narrative the link to the Maryland project and ALB.	Comment accepted; text will be modified. It is important to note that the Virginia project is being coordinated with Maryland's project, but I-495 NEXT has independent utility and need.	Comment addressed

**I-495 VDOT Express Lane Extension Environmental Assessment  
NPS Comment Tracking**

ID	Reviewer	Page	Section	NPS Comment	VDOT Response (1/11/21)	NPS Review 1/20/2021
8	NPS	1-1	1.2 - General - Study Area	Replace the word "improvements" with "construction" or "project"	Comment accepted; text will be modified.	Comment addressed
9	NPS	1-4	1.2	Study Area - Add Georgetown Pike to this description - The auxiliary lanes on the outer loop connect to the GWMP and Georgetown Pike in Virginia.	Comment accepted; text will be modified.	Comment addressed
10	NPS	1-4	1.2	Study Area - Add clarification to the statement - The Scotts Run Nature Preserve is Fairfax County parkland.	Comment accepted; text will be modified.	Comment addressed
11	NPS	1-4	1.2	What does "open federal parkland" mean? Change this to "...is primarily National Park Service parkland associated with the GWMP to the east..."	Comment accepted; text will be modified.	Comment addressed
12	NPS	1-8	1.3.1	To be consistent with how other projects are listed please include timeline or schedule for the I-495 and I-270 Managed Lanes Study and EIS.	Comment accepted; text will be modified so information about the Maryland project is at the same level of detail as other projects, and the EA clarifies which projects are under VDOT purview.	Comment addressed
13	NPS	2-5	Other Roadway and Bicycle/Pedestrian Improvements	Consider updating the design drawings to prohibit passage beyond Live Oak Drive until the connection to the ALB shared use path is complete. Visitors should not be allowed to travel far along a path that dead ends.	Comment noted; the EA represents the full design, not Phase 1, so the graphics will not be revised, but the text will be modified to clarify that logical sections between interim termini will be available for use as they are opened.	Comment addressed
14	NPS	3-1	3.1.1	Replace the word "improvements" with "construction" or "project"	Comment accepted; text will be modified.	Comment addressed
15	NPS	3-6	Table - Section 4(f)	Build Alternative - "Final impacts to the GWMP are yet to be determined, but is within LOD." These impacts need to be determined and spelled out plainly for public comment.	Comment accepted; text and figures will be modified as needed for correctness and consistency to identify I-495 NEXT design and impacts, while still pointing to future design and permitting which will identify final design and impacts.	Comment addressed
16	NPS	3-8	Table - Water Quality	Please clarify. "The Potomac River is not within the LOD and is not expected to be impacted." The Potomac River is shown within the LOD is Fig. 3.1 and many other figures.	Comment accepted; text and figures will be modified as needed for correctness and consistency.	Comment addressed

**I-495 VDOT Express Lane Extension Environmental Assessment  
NPS Comment Tracking**

ID	Reviewer	Page	Section	NPS Comment	VDOT Response (1/11/21)	NPS Review 1/20/2021
17	NPS	3-8	Table - Floodplains	Build Alternative - "Approximately 60 acres of floodplains are located within the LOD. The project design would be consistent with federal policies and would not be a "significant encroachment;" therefore no increase in flood levels or probability of flooding are expected." What portion of this is NPS land?	Comment accepted; this information will be provided to NPS.	Comment addressed
18	NPS	3-9	Table - Wildlife and Habitat	Statement "edge habitat is low-quality." More information and context is needed to understand the meaning of "edge" and "low quality"	Comment accepted; additional text will be added.	Comment addressed
19	NPS	3-9	Table - Wildlife and Habitat	Existing Resource Summary - "A total of 68 species are likely to occur or are confirmed to occur within a 2-mile radius of the study area." This number is far too low. See citations of papers below that document the number of species in Turkey Run Park, including state listed species, species new to Virginia, and species new to science. Additionally 292 species of birds have been documented from GWMP. The majority of these pass through or nest in the project area. A survey of springtails in GWMP documented 145 species including 37 species new to science (many of which may occur in the project area). A survey of nematodes in GWMP documented 260 species including 30 species probably new to science.	Comment partially accepted; the list in the EA is only species within the study area (LOD), not within the entire GWMP. The additional information will be included in an appendix and will be referenced in the body of the EA.	Comment addressed
20	NPS	3-9	Table - Threatened, Endangered, and Special Status Species	Existing Resource Summary - Threatened, Endangered, and Special Status Species - These are only the federally listed species. See list of state listed species, species new to Virginia (more rare than state listed species because they were just documented from the state), and species new to science (generally documented from only a few sites in the world) that have been found in the project area.	Comment acknowledged; the conclusions in the EA are based on database research and field visits, following FHWA environmental document guidelines. See response above for means of providing listing of all species requested by NPS.	Comment addressed
21	NPS	3-9	Table - Threatened, Endangered, and Special Status Species	No Build Alternative - "No changes to populations of threatened or endangered species, or their respective habitats, would result." - Cite study supporting this claim.	Comment acknowledged; there would be no action with the No Build Alternative, and therefore no changes as a result of of this project. The No Build impact conclusions do not refer to other changes possible in the environment unrelated to the I-495 NEXT project. There is no specific study to reference.	Comment addressed



**I-495 VDOT Express Lane Extension Environmental Assessment**  
**NPS Comment Tracking**

ID	Reviewer	Page	Section	NPS Comment	VDOT Response (1/11/21)	NPS Review 1/20/2021
22	NPS	3-14	3.2.2	Have a TBD for potential impacts to GWMP lands. Can you put an estimate of the acreage for permanent and temporary impacts to GWMP lands?	Comment accepted; text will be modified to reflect additional information that is now available. Impacts will be calculated as area within the permanent and temporary limits of the project, but will not be defined as "conversion" since easements or other agreements may be made. Further detail will be provided to NPS outside of the EA.	Comment addressed
23	NPS	3-17	3.4.3	Build alternatives have negative affects on the environment and these need to be stated here: reduced habitat, reduced water quality, risks to endangered species, reduced air quality due to increased traffic volume, reduced oxygen production due to tree loss, increased temperature of microclimate due to loss of canopy cover, etc. These are what need to be listed in this section.	Comment acknowledged; Section 3.4.3 is summarizing impacts to economic resources (e.g., travel time, employment). Reference to environmental impacts are not necessary here. These are covered elsewhere in the document.	This comment was dismissed because VDOT said it was not appropriate for section 3.4.3. However, VDOT's response states this comments is more appropriate for the "environmental impacts" section but did not say it would be reflected in the environmental impacts section. Please clarify?
24	NPS	3-17	3.5.1	GWMP is a National Park Service property, and should not be compared to the Scott's Run Nature Preserve and "parkland" but should be referred to and a National Park Service property and depicted differently on all graphics and referred to as a NPS property to elevate its importance.	Comment accepted; text will be modified.	Comment addressed
25	NPS	3-17	3.5.1	Maybe update this to say - "VDOT has coordinated and will continue to coordinate with both the Fairfax County Park Authority (FCPA) and the National Park Service (NPS) throughout development of this project and will continue to seek ways to minimize and mitigate the project's design."	Comment accepted; text will be modified.	Comment addressed
26	NPS	3-17	3.5.1	These aren't just recreational resources, there are natural and cultural resources. Please update accordingly.	Comment accepted; text will be modified.	Comment addressed
27	NPS	3-17	3.5.1	Last paragraph is a little confusing, state parkway + surrounding park land is NPS	Comment accepted; text will be modified.	Comment addressed

**I-495 VDOT Express Lane Extension Environmental Assessment**  
**NPS Comment Tracking**

ID	Reviewer	Page	Section	NPS Comment	VDOT Response (1/11/21)	NPS Review 1/20/2021
28	NPS	3-18	3.5.2	Are we sure this is what will be the direction for use of GWMP lands, property acquisition? I did not think this was the direction NPS provided. In an earlier part of the EA it stated that this is still being discussed. TBD	Comment accepted; this section of the EA assumed all property within the easement would be temporary, and all other property within the proposed right-of-way would be permanent acquisition. This section of the EA will be revised to differentiate for GWMP lands, and will include conclusions of the discussions if available at the time of completion of the revised EA. Parkland impacts could be described as converted, special use permit, or other designation. Table 3-2 will be revised.	Comment addressed
29	NPS	3-22	3.7	It seems like the APE for indirect effects should be stated as the "study area" as mapped on figure 3-5.	Comment accepted; Figure 3-5 will be revised to label the pink area (currently labeled as "Historic Architecture Area of Potential Effects") as the APE for indirect effects. The LOD is the APE for direct effects.	Comment addressed
30	NPS	3-22	3.7	Discuss character defining features of GWMP	Comment accepted; language will be added from the Cultural Landscape Report.	Comment addressed
31	NPS	3-24	3.7.2	This section needs to be updated with a determination of effect and plan for resolving adverse effects in greater detail.	Comment accepted; language will be added.	Comment addressed
32	NPS	3-23	Figure 3-5	The NPS property boundary and NRHP Listed Architectural Resources should be the same boundary. NPS can provide the correct GIS boundary file.	Comment accepted; figures will be revised.	Comment addressed
33	NPS	3-23	3.7.1	Add information in this section regarding--George Washington Memorial Parkway in addition to being on the National Register of Historic Places, the George Washington Memorial Parkway is designated as an official All-American Road (2005). An All-American Road must meet the same criteria as a National Scenic Byway, but possess multiple intrinsic qualities that are of national significance and the byway must be considered a destination and reason for travel unto itself. <a href="https://www.nps.gov/gwmp/learn/management/index.htm">https://www.nps.gov/gwmp/learn/management/index.htm</a>	Comment accepted; text will be modified to add reference to All-American Road.	Comment addressed
34	NPS	3-23	3.7.1	Need more information here to provide more description about the character defining features for the GWMP. NPS can provide language, if needed.	Comment accepted; language will be added from the Cultural Landscape Report.	Comment addressed

**I-495 VDOT Express Lane Extension Environmental Assessment  
NPS Comment Tracking**

ID	Reviewer	Page	Section	NPS Comment	VDOT Response (1/11/21)	NPS Review 1/20/2021
35	NPS	3-23	3.7.1	Potomac Heritage National Scenic Trail and GWMP Interchange are the only items called out and they are the non-contributing features. If you are doing this, need to include the contributing features list then (see character defining features description that is needed as well)	Comment accepted; text will be modified to add reference to all contributing features. Text will also be added to Section 3.7 noting that the indirect APE accommodates a potential change in view resulting from the project.	Comment addressed
36	NPS	3-23	3.7.1	Georgetown Pike has the distinction of being the state's first scenic and historic byway, designated in 1974. Please include this information here.	Comment accepted; language will be added.	Comment addressed
37	NPS	3-25	3.8.1	Section 4(f) - Summary of the GWMP is inadequate. Need to include its protection of the Potomac River Gorge and the natural scenery within (forest vegetative community). This is from the park's Enabling Legislation.	Comment accepted; language will be added.	Comment addressed
38	NPS	3-26	3.8.1	Not Potomac Natural Heritage Trail. Please note that the official name of this trail is "Potomac Heritage National Scenic Trail". The evolving PHT network is managed by various governmental agencies and nonprofit organizations.	Comment accepted; text will be modified.	Comment addressed
39	NPS	3-26	3.8.1	The PHT will be impacted more so by the ALB project, but there is potential the trail connections to Scott's Run Nature Preserve will be impacted so PHT may be a 4(f) property.	Comment acknowledged; this will be addressed as part of Maryland's project to improve the ALB.	Comment addressed
40	NPS	3-29	Table 3-4	Can you put an estimate of the acreage for permanent and temporary impacts to GWMP lands?	Comment accepted; text will be modified to reflect additional information that is now available. Impacts will be calculated as area within the permanent and temporary limits of the project, but will not be defined as "conversion" since easements or other agreements may be made. Further detail will be provided to NPS outside of the EA.	Comment addressed
41	NPS	3-29	Table 3-4 and narrative	Just to be clear, the NPS has not agreed with this determination of de minimis impact to the GWMP	Comment accepted; the EA will capture the impacts and agreements known at time of completion, and text will be modified to more clearly represent status of those agreements.	Comment addressed

**I-495 VDOT Express Lane Extension Environmental Assessment  
NPS Comment Tracking**

ID	Reviewer	Page	Section	NPS Comment	VDOT Response (1/11/21)	NPS Review 1/20/2021
42	NPS	3-29	Table 3-4, Note	This note indicates that NPS will "issue VDOT a permit or a permanent easement within NPS lands for the construction of the I-495 NEXT Project." If there will be perpetual impacts to the GWMP as a result of this project, the NPS prefers that these be authorized through a highway easement deed that that FHWA would execute on behalf of the USA, in accordance with 23 USC 107. Thus, the easement would not be "issued by the NPS". It would be issued by the United States and executed by FHWA, on behalf of the United States, in accordance with 23 USC 107. NPS would prefer to authorize temporary construction impacts by a special use permit, which would be issued by GWMP.	Comment accepted; text will be modified to reflect additional information that is now available. Impacts will be calculated as area within the permanent and temporary limits of the project, but will not be defined as "conversion" since easements or other agreements may be made. Further detail will be provided to NPS outside of the EA.	Need to see EA to see how this comment was addressed.
43	NPS	3-30	3.9	Please consider verifying the first sentence of this section, specifically whether section 6(f) of LWCF concerns federal acquisitions, as it currently appears to suggest. Also consider verifying/clarifying the second sentence, concerning conversion, specifically whether the conversion provision applies to lands acquired/developed through State-side LWCF only and not the Federal side. This is not clear from the text as written.	Comment accepted; this text will be reviewed and revised as appropriate.	Comment addressed
44	NPS	3-36	General - Noise	Although they are not shown as being proposed, NPS is not in support of installing any noise barriers on NPS lands	NPS's comments on the EA will be captured in the Revised EA appendix. No change is needed within the body of the Revised EA.	Comment addressed
45	NPS	3-49	3.13	Why are the dynamic message boards mentioned in the VDOT EA in the vicinity of Dead Run? This is MDOT element that is not included or needed for the VDOT project. Remove reference to this sign and only refer to the one within the VDOT ROW off NPS lands if needed in this section of the EA.	Comment accepted; text and figures will be modified as needed for correctness and consistency.	Comment addressed
46	NPS	3-49	3.13.2	All Dynamic message signs requiring power or fiber will need separate Right of Way permits with NPS for the utility including its own survey and legal description for each permit.	Comment acknowledged; no change needed in the EA.	Comment addressed



**I-495 VDOT Express Lane Extension Environmental Assessment**  
**NPS Comment Tracking**

ID	Reviewer	Page	Section	NPS Comment	VDOT Response (1/11/21)	NPS Review 1/20/2021
47	NPS	3-52	3.15	Existing Conditions - See list of citations below that describe the existing conditions in Turkey Run Park (GWMP). Cite these in this section and summarize each citation from the information given below.	Comment partially accepted; the list of citations will be added to Section 5 (References), and a short summary of the collective resources will be added to Section 3.	Additional papers have been published since NPS completed our review. One such publication documents more rare resources from Turkey Run Park. (such as the species of soldier beetle new to science and know in the world only from Turkey Run). This is further proof that Turkey Run Park (including the LOD) have innumerable resources, some not known from anywhere else in the world, and other still awaiting discovery, that could be destroyed by this construction.
48	NPS	3-52	3.15.1	Do not mention NPS lands in this context as a natural forest cover and its connection to the larger sensitive Potomac Gorge conservation area.	Comment partially accepted. The only reference to NPS in Section 3.15.1 is "Parks owned by the FCPA or NPS can be seen in Figure 3-13." This is in context of discussing parks and natural areas near the project.	Comment addressed

**I-495 VDOT Express Lane Extension Environmental Assessment  
NPS Comment Tracking**

ID	Reviewer	Page	Section	NPS Comment	VDOT Response (1/11/21)	NPS Review 1/20/2021
49	NPS	3-56	Table 3-11	This table only includes the federally listed species. Since NPS gives the same level of protection to state listed and federally listed species it should include the state listed species as well. Special emphasis should also be given to species newly documented from Virginia that are not state listed yet (due to newness of discovery) and to species that are new to science found in the study area. See below for a list of these species.	Comment partially accepted; the list in the EA is only species within the study area (LOD), not within the entire GWMP. The additional information will be included in an appendix and will be referenced in the body of the EA.	We will await the final EA review to determine whether the updated text acknowledges the potential of some of the rare resources being in the project area even though they were only documented in Turkey Run Park and not within the LOD specifically. Since we do not have a 100% survey of the LOD, there is a still a possibility that they could be within the LOD (VDOT has not proven to that they are not present). The only survey that has been completed is for plants MDOT project or VDOT - need to verify this with Brent before sending. Two species of state listed plants were found in the LOD (one being very common there). Are they going to survey for all the other species? How will they document that they are not there? Many of the species fly and so could come into the LOD between the time of the survey and construction. Other species (salamanders, snails, turtles, etc.) are less mobile and will be doomed by construction unless they are removed from the LOD.
50	NPS	3-62	3.18	Indirect impacts - how about views? Aren't views considered an indirect impact?	Comment accepted; views are accounted for in resource-specific direct impact discussions such as cultural resources and community impacts.	Comment addressed

**I-495 VDOT Express Lane Extension Environmental Assessment**  
**NPS Comment Tracking**

ID	Reviewer	Page	Section	NPS Comment	VDOT Response (1/11/21)	NPS Review 1/20/2021
51	NPS	3-68	3.18.2	Cumulative impact discussion omits discussion of GWMP. As noted in Table 4.1, NPS had requested this information during agency scoping.	Comment accepted; language will be added.	Comment addressed
52	NPS	5-1	References	Include all of the references cited below in the References section starting on page 5-1.	Comment accepted; language will be added.	Comment addressed

**I-495 VDOT Express Lane Extension Environmental Assessment  
NPS Comment Tracking**

ID	Reviewer	Page	Section	NPS Comment	VDOT Response (1/11/21)	NPS Review 1/20/2021
53	NPS	Virginia State listed species and their rankings documented from Turkey Run Park (GWMP)		<p>PLANTS - Arabis patens (spreading rockcress), S2 G3; Arabis shortii (Boechera dentata) (short's rockcress), S2 G5; Carex careyana (carey's sedge), S3 G4G5; Cerastium arvense var. velutinum (field chickweed), S2? G5T4?; Eriginea bulbosa (harbinger-of-spring), S3 G5; Erythronium albidum (white trout-lily), S2 G5; Floerkea proserpinacoides (false mermaid-weed), S3 G5; Hasteola suaveolens (Senecio suaveolens) (sweet-scented indian-plantain), S2 G4; Juglans cinerea (butternut), S3? G4; Maianthemum stellatum (starry false solomon's seal), S2 G5; Matteuccia struthiopteris (ostrich fern), S1 G5T5; Panax quinquefolius (american ginseng), S3S4 G3G4 LT; Phacelia covillei (coville's phacelia), S1 G3; Spartina pectinata (freshwater cordgrass), S2 G5; Valeriana pauciflora (pink valerian), S2 G4.</p> <p>ANIMALS -Stygobromus pizzinii (groundwater amphipod), S1S2 G2; Stygobromus sextarius (groundwater amphipod), S1 G1; Fontigens bottimeri (appalachian springsnail), S1S2 G2; Striatura milium (fine-ribbed striate), SU G5; Acronicta radcliffei (Radcliffe's dagger moth), S2S4 G5; Oligia (Neoligia) crytora (mantled brocade), S2S4; Orthosia revicta (subdued quaker moth), S2S4 G?; Sphinx franckii (franck's sphinx), S2S3 G4; Cordulegaster erronea (tiger spiketail), S3 G4; Hydropsyche hoffmani (A Caddisfly, Trichoptera), G3G4, S3; Ithytrichia clavata (A Caddisfly, Trichoptera), G5, S2S4; Mayatrichia ayama (A Caddisfly, Trichoptera), G5, S2S4; Ochrotrichia tarsalis (A Caddisfly, Trichoptera); Rhyacophila invaria (A Caddisfly, Trichoptera), G5, S2S4; Hydropsyche brunneipennis (A Caddisfly, Trichoptera), G3G4, S1S3; NOTE rare moth species may have larvae that feed on common plant species.</p> <p>Loss of the host plant can lead to loss of the rare moth. The host plants for the larvae of Acronicta radcliffei are hawthorns and prunus sps., for , Orthosia revicta they are various trees including poplar and cherry, for</p>	See above response.	Comment addressed



**I-495 VDOT Express Lane Extension Environmental Assessment  
NPS Comment Tracking**

ID	Reviewer	Page	Section	NPS Comment	VDOT Response (1/11/21)	NPS Review 1/20/2021
54	NPS	Citations for Number of Species and Number of New State Records Documented from Turkey Run Park. Use these to determine number of species in the project area and add them to the tables of rare species in the study area.		<p>1) <b>Barrows, E.M. &amp; D.R. Smith. 2014.</b> Sawflies (Hymenoptera, Symphyta) of three Mid-Atlantic Parks in the George Washington Memorial Parkway, U.S.A. <i>Journal of Hymenoptera Research</i> 39:17-31. 115 species of sawflies in Turkey Run Park. One species, Kerita fidala, is NEW TO VIRGINIA. 2) <b>Brattain, M. R., B. W. Steury, A. F. Newton, M. K. Thayer, and J. D. Holland. 2019.</b> The rove beetles (Coleoptera: Staphylinidae) of the George Washington Memorial Parkway, with a checklist of regional species. <i>Banisteria</i> 53: 27-71. 125 species of rove beetles in Turkey Run Park. 25 species are NEW TO VIRGINIA. 3) <b>Cavey, J.F., B.W. Steury, &amp; E.T. Oberg. 2013.</b> Leaf beetles (Coleoptera: Bruchidae, Chrysomelidae, Orsodacnidae) from the George Washington Memorial Parkway, Fairfax County, Virginia. <i>Banisteria</i> 41:71-79. 41 species of leaf beetles in Turkey Run Park. 4) <b>Cohn, J.P. 2004.</b> The wildest urban river: Potomac River Gorge. <i>BioScience</i> 54:8-14. This would be an excellent paper to cite in the Existing Conditions section. 5) <b>Evans, A.V. &amp; B.W. Steury. 2012.</b> The Cicada Parasite beetles (Coleoptera: Rhipiceridae) of Virginia. <i>Banisteria</i> 39:65-70. 2 species of cicada parasite beetles in Turkey Run Park. One species, Sandalus petrophya, is NEW TO VIRGINIA. 6) <b>Flint, O.S., Jr. 2011.</b> Trichoptera from the Great Falls and Turkey Run units of the George Washington Memorial Parkway, Fairfax Co., Virginia, USA. <i>Zoosymposia</i> 5:101-107. 76 species of caddisflies in Turkey Run Park. Two species, Ceraclea resurgens and Polycentropus carlsoni are NEW TO VIRGINIA. See below for an additional species of caddisfly new to science from Turkey Run Park. 7) <b>Steury, B.W. 2014.</b> Aquatic snails (Gastropoda) from national park sites in northern Virginia and adjacent Maryland, with an updated checklist of regional species. <i>Banisteria</i> 44:13-18. 6 species of aquatic snails in Turkey Run Park, including the only GWMP record of the limpit</p>	See above response.	The citations for the new publications that should be included in the EA are: Steury, B.W. 2020. <i>Cantharis sheraldi</i> Steury (Coleoptera: Cantharini), a New Species of Soldier Beetle from Virginia, USA. <i>The Coleopterists Bulletin</i> 74(3): 601-604; Steury, B.W., & R.M. Brattain. 2020. Six rove beetles (Coleoptera: Staphylinidae) new to Virginia. <i>Banisteria</i> 54: N4-N13.

**I-495 VDOT Express Lane Extension Environmental Assessment  
NPS Comment Tracking**

ID	Reviewer	Page	Section	NPS Comment	VDOT Response (1/11/21)	NPS Review 1/20/2021
55	NPS	Citations for Number of Species and Number of New State Records Documented from Turkey Run Park - Continued from above		<p>8) <b>Steury, B.W. 2017.</b> First record of the rove beetle <i>Trigonodemus striatus</i> LeConte (Coleoptera: Staphylinidae) from Virginia and additional new park records (Coleoptera: Anthicidae, Buprestidae, Carabidae, Cerambycidae, Chrysomelidae) for the George Washington Memorial Parkway. <b>Banisteria 48:14-16.</b> One species, <i>Trigonodemus striatus</i>, is NEW TO VIRGINIA. 9) <b>Steury, B. W. 2018.</b> Annotated checklist of some fungivorous beetles (Coleoptera: Anamorphidae, Biphylidae, Derodontidae, Endomychidae, Erotylidae, and Tetratomidae) of the George Washington Memorial Parkway. <b>Banisteria 50: 21-28.</b> 27 species of fungus beetles in Turkey Run Park. Four species, <i>Tritoma erythrocephala</i>, <i>Microsternus ulkei</i>, <i>Tritoma mimetica</i> and <i>Hallomenus scapularis</i>, are NEW TO VIRGINIA. 10) <b>Steury, B. W. 2018.</b> Four longhorned beetles (Coleoptera: Cerambycidae) new to Virginia and additional new park records (Coleoptera: Anthicidae, Buprestidae, Cantharidae, Carabidae, Cerambycidae, Chrysomelidae) for the George Washington Memorial Parkway. <b>Banisteria 50: 29-31.</b> One species, <i>Obrium rubidum</i>, from Turkey Run Park NEW TO VIRGINIA. 11) <b>Steury, B. W. 2019.</b> The ant-like leaf beetles (Coleoptera, Aderidae) of the George Washington Memorial Parkway, Fairfax County, Virginia. <b>Banisteria 52: 46-49.</b> Four species of ant-like leaf beetles from Turkey Run Park including the FIRST VIRGINIA RECORD of <i>Aderus brunnipennis</i>. 12) <b>Steury, B.W., J. Glaser, &amp; C.S. Hobson. 2007.</b> A survey of macrolepidopteran moths of Turkey Run and Great Falls National Parks, Fairfax County, Virginia. <b>Banisteria 29:17-31.</b> 222 moth species documented from Turkey Run Park including the FIRST VIRGINIA RECORD of <i>Abrostola urentis</i>. 13) <b>Steury, B. W. &amp; J. M. Leavengood, Jr. 2018.</b> Annotated Checklist of Checkered Beetles from the George Washington Memorial Parkway,</p>	See above response.	Comment addressed

**I-495 VDOT Express Lane Extension Environmental Assessment  
NPS Comment Tracking**

ID	Reviewer	Page	Section	NPS Comment	VDOT Response (1/11/21)	NPS Review 1/20/2021
56	NPS	Citations for Number of Species and Number of New State Records Documented from Turkey Run Park - Continued from above		<p>15) Steury, B.W. &amp; T.A. Pearce. 2014. Land Snails and Slugs (Gastropoda: Caenogastropoda and Pulmonata) of two National Parks along the Potomac River near Washington, District of Columbia. <i>Banisteria</i> 43:3-20. 22 species of land snails and slugs in Turkey Run Park. 16) Steury, B.W. &amp; T.C. MacRae. 2014. The longhorned beetles (Insecta: Coleoptera: Cerambycidae) of the George Washington Memorial Parkway. <i>Banisteria</i> 44:7-12. 37 species of longhorned beetles in Turkey Run Park. Four species, <i>Centrodera decolorata</i>, <i>Trachysida mutabilis</i>, <i>Clytus ruricola</i>, and <i>Saperda puncticollis</i> are NEW TO VIRGINIA. 17) Steury, B.W., T.C. MacRae, &amp; E.T. Oberg. 2012. Annotated list of the metallic wood-boring beetles (Insecta: Coleoptera: Buprestidae) of the George Washington Memorial Parkway, Fairfax County, Virginia. <i>Banisteria</i> 39:71-75. Five species of metallic wood-boring beetle are documented from Turkey Run Park. 18) Steury, B.W, W.E. Steiner, Jr., &amp; F.W. Shockley. 2018. The soldier beetles and false soldier beetles (Coleoptera: Cantharidae and Omethidae) of the George Washington Memorial Parkway. <i>The Maryland Entomologist</i> 7:11-27. 14 species of soldier beetles in Turkey Run Park. Seven species are First Records for Virginia.</p>		Comment addressed

**I-495 VDOT Express Lane Extension Environmental Assessment  
NPS Comment Tracking**

ID	Reviewer	Page	Section	NPS Comment	VDOT Response (1/11/21)	NPS Review 1/20/2021
57	NPS	Species New to Science from Turkey Run Park. These are species newly discovered and described by science that occur in the project area.		<p>1) Flint, O.S., Jr. &amp; K.M. Kjer. 2011. A new species of <i>Neophylax</i> from northern Virginia, USA (Trichoptera: Uenoidae). <i>Proceedings of the Entomological Society of Washington</i> 113:7-13. A new species of caddisfly from Turkey Run Park, <i>Neophylax virginica</i> . 2) Holsinger, J.R. 2009. Three new species of the subterranean amphipod crustacean genus <i>Stygobromus</i> (Crangonyctidae) from the District of Columbia, Maryland, and Virginia. Pp. 261-276 In S. M. Roble and J. C. Mitchell (eds.). <i>A Lifetime of Contributions to Myriapodology and the Natural History of Virginia: A Festschrift in Honor of Richard L. Hoffman's 80th Birthday</i>. Virginia Museum of Natural History Special Publication No. 16, Martinsville, VA. A new species of amphipod from Turkey Run Park, <i>Stygobromus sextarius</i> . 3) Mathis, W. N., K.V. Knutson &amp; W.L. Murphy. 2009. A new species of the snail-killing fly of the genus <i>Dictya</i> Meigen from the Delmarva States (Diptera: Sciomyzidae). <i>Proceedings of the Entomological Society of Washington</i> 111(4): 785-794. A new species of fly from Turkey Run Park, <i>Dictya orthi</i>. 4) Mathis, W. N. &amp; T. Zatzwarnicki. 2010. New species and other taxonomic modifications for shore flies from the Delmarva States (Diptera: Ephydriidae). <i>Proceedings of the Entomological Society of Washington</i> 112: 97-128. 4 new species of flies from Turkey Run Park, <i>Hydrochasma aquia</i>, <i>H. avanae</i>, <i>H. garvinorum</i> (Dead Run Mouth), and <i>Allotrichoma deonieri</i> .</p>	See above response.	Comment addressed
58	NPS	Appendices	Table 3.1	de minimis determination is pre-decisional at this point and can not be known and thus should not be stated.	Comment accepted; See previous response above - text will be modified. If a 4(f) conclusion is made before the Revised EA is completed, these sections will be revised again.	Comment addressed
59	NPS	Appendices	9	Features and functions: Add description of the Potomac Gorge and its values to wildlife using citations below.	Comment accepted; language will be added.	Comment addressed
60	NPS	Appendices	10	Unusual characteristics: Add Potomac Gorge	Comment accepted; language will be added.	Comment addressed
61	NPS	4(f)	General	Section 4f references and easement that would likely be acquired. Text should indicate that this will be a Highway Easement Deed and that the 4f and the NEPA need to cover this action.	Comment accepted; language will be added.	Comment addressed



**I-495 VDOT Express Lane Extension Environmental Assessment**  
**NPS Comment Tracking**

ID	Reviewer	Page	Section	NPS Comment	VDOT Response (1/11/21)	NPS Review 1/20/2021
62	NPS	4(f)	General	Impacts to the GWMP have not been quantified within the Section 4f while they were quantified for Scott's run.	Comment accepted; text will be modified to reflect additional information that is now available.	Comment addressed
63	NPS	4(f)	General	The EA and the 4f must be submitted to DOI for concurrence on the 4f determination. Without the impacts outlined, this cannot happen	Comment accepted; text will be revised to include impacts.	Comment addressed
64	NPS	4(f)	General	Needs more detailed information about the historic resources for the GWMP. Provide more description about the character defining features for the GWMP	Comment accepted; language will be added.	Comment addressed
65	NPS	4(f)	General	To the extent any temporary construction uses will occur on NPS lands, NPS's preference would be to authorize these uses through special use permits. If appropriate, you might consider, throughout the document, revising references to "temporary construction easements" or "temporary easements for construction" so as to include, reference construction permits or permits for construction.	Comment accepted; text will be modified.	Comment addressed
66	NPS	4(f), page 5	3.1	In bullet point re: GWMP, second line, technically the lands are owned by the United States and administered by the NPS. Suggest revising to: "...are owned by the United States and administered by the National Park Service (NPS)...".	Comment accepted; text will be modified.	Comment addressed
67	NPS	4(f), page 5	3.1	Has NPS been given the opportunity to verify the acreage (~4.7 ac) of the proposed LOD impacting NPS lands, such as through independent verification of the intersection of the project LOD shapefile with NPS's tract and boundary shapefile? If not, can this please be arranged?	Comment accepted; text will be modified to reflect additional information that is now available. Impacts will be calculated as area within the permanent and temporary limits of the project, but will not be defined as "conversion" since easements or other agreements may be made. Further detail will be provided to NPS outside of the EA.	NPS will look at the writeup in the EA to see how this comment has been address. If possible, please send NPS shapefiles for LOD.
68	NPS	4(f), page 9	3.2.1	In paragraph addressing "Ownership and type of Section 4(f) property": Technically the lands are owned by the United States and administered by the NPS. Suggest revising to: "...are owned by the United States and administered by the National Park Service (NPS)...".	Comment accepted; text will be modified.	Comment addressed
69	NPS	4(f), page 9	3.2.1	In paragraph addressing "Clauses affecting ownership": Again, land within the GWMP is owned by the United States and administered by the National Park Service. Please clarify the second sentence, the meaning is not clear.	Comment accepted; text will be modified.	Comment addressed

**I-495 VDOT Express Lane Extension Environmental Assessment  
NPS Comment Tracking**

ID	Reviewer	Page	Section	NPS Comment	VDOT Response (1/11/21)	NPS Review 1/20/2021
70	NPS	4(f), page 17	3.2.6	Recreational Area Impacts - Scenic Driving is considered a recreational use for the parkway. The full intent of designing the parkway was for the recreational scenic driving experience. The project will impact that experience if the entry area is marred by new features that are incompatible with the parkway character and if the forested vegetative community is impacted to build the new lanes (regrading the slopes that are vegetated).	Some mitigation is already proposed (such as revegetating the areas that are proposed to be cleared as part of the I-495 NEXT project). These mitigation measures will address concerns regarding impacts to vegetation, which is a part of the GWMP landscape.	Comment addressed
71	NPS	4(f), page 17	3.2.6	The characterization of GWMP as "a public land holding" seems a little awkward, unless this is a term of art. Would Federal parkland be acceptable substitute? Or a unit of the National Park System?	Comment accepted; text will be modified if appropriate.	Comment addressed
72	NPS	4(f), page 18	3.2.6	NPS continues to have on-going dialog with VDOT to reduce the removal of vegetation at the entry to the GWMP and on VDOT lands, to support a no adverse effect Section 106 finding.	Comment accepted; text will be modified if needed based on conclusions of discussions.	Comment addressed
73	NPS	4(f), page 18	3.2.6	In the first paragraph of the first bullet point, discussion of the proposed future easement is awkwardly and/or incorrectly written in several places. First, Figure 7 only depicts the LOD where it intersects with the GWMP boundary; it doesn't specifically address where easements might be conveyed for perpetual impacts or where special use permits might be conveyed for temporary construction impacts. Second, the text suggests that the project will "acquire an easement from the GWMP". If there will be perpetual impacts to the GWMP as a result of this project, the NPS prefers that these be authorized through a highway easement deed that FHWA would execute on behalf of the USA, in accordance with 23 USC 107. Thus, the easement would not be "from the GWMP". It would be from the United States and executed by FWHA, on behalf of the United States, in accordance with 23 USC 107. Third, one does not speak of the "amount" of an easement or "easement amounts." It would be more appropriate to reference the "area" and the "terms" of the proposed easement. Finally, the sentence about the area of the easement being determined through ongoing coordination with NPS should be revised to also include reference to a land survey.	Comment accepted; text and figures will be modified as needed for correctness and consistency to address highway easement deed.	Comment addressed

**I-495 VDOT Express Lane Extension Environmental Assessment  
NPS Comment Tracking**

ID	Reviewer	Page	Section	NPS Comment	VDOT Response (1/11/21)	NPS Review 1/20/2021
74	NPS	4(f), page 18	3.2.6	In the second paragraph of the first bullet point, rewrite so that references are to "easements in land" and not "easements from an area". Also, this paragraph doesn't demonstrate a clear and explicit understanding that express lane tolling signage installed on GWMP lands will also require authorization through an easement.	Comment accepted; text will be modified.	Comment addressed
75	NPS	4(f), page 18	3.2.6	In the third paragraph of the first bullet point, discussion of "equipment access on GWMP" land should in some way reference the need for a special use permit, or that such access would be in accordance with a special use permit issued by GWMP.	Comment accepted; text will be modified.	Comment addressed
76	NPS	4(f), page 19	3.2.6	Please refer to the GWMP latest correspondence 4/27/2020 on minimizing and mitigating impacts to GWMP resources.	Comment accepted; text will be modified.	Comment addressed
77	NPS	4(f), page 21	Figure 7	Please indicate on Figure which signs are VDOT project signs. Only the DMS sign is for VDOT. All the others are from MDOT.	Comment accepted; figures will be revised.	Comment addressed
78	NPS	4(f), page 28	4.1	Please consider verifying/clarifying the sentence concerning conversion, specifically whether the conversion provision applies to lands acquired/developed through State-side LWCF only and not the Federal side. This is not clear from the text as written b/c the preceding sentence references both federal and state-side acquisition.	Comment accepted; text will be modified.	Comment addressed
79	NPS	4(f), page 30	5.0.	Please verify the first citation to LWCF section 6(f).	Comment accepted; citation will be verified.	Comment addressed



# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF TRANSPORTATION

4975 Alliance Drive  
Fairfax, Virginia 22030

Stephen C. Brich, P.E.  
Commissioner

March 24, 2021

Mr. Charles Cuvelier  
Superintendent  
George Washington Memorial Parkway  
700 George Washington Memorial Parkway  
McLean, VA 22101

**SUBJECT: I-495 Express Lanes Northern Extension (Project NEXT)**  
State Project Number: 0495-029-419, P101  
UPC Number: 113414  
From: Dulles Toll Road (Route 267) Interchange  
To: George Washington Memorial Parkway Interchange  
**SECTION 4(f); SIGNIFICANCE DETERMINATION, TEMPORARY  
OCCUPANCY, AND *DE MINIMIS* IMPACTS**

Dear Superintendent Cuvelier:

As you are aware, the Virginia Department of Transportation (VDOT), in cooperation with the Federal Highway Administration (FHWA), is proposing to extend the Interstate 495 (I-495) Express Lanes for approximately three miles, from the I-495/Dulles Toll Road (Route 267) interchange to the George Washington Memorial Parkway (GWMP) in the McLean area of Fairfax County, Virginia. The project is intended to reduce congestion and improve travel reliability as population and employment continue to grow in the region, and to provide additional travel choices to single-occupancy drivers while encouraging high-occupancy travel modes. The project would include the construction of several shared-use paths and bicycle facilities.

Planning-level estimates indicate that the proposed design for the project will require a temporary construction easement not to exceed 1.3 acres, and a permanent easement not to exceed approximately 0.9 acres, of the GWMP, a property protected under Section 4(f) of the Department of Transportation Act of 1966 (Section 4(f)). The proposed temporary and permanent easements are identified on Figure 1.



Under Section 4(f), FHWA may approve a transportation project requiring the use of publicly owned land of a public park, recreation area, wildlife and waterfowl refuge, or land of a historic site that is listed on or eligible for listing on the National Register of Historic Places only if: (1) there is no feasible and prudent alternative to using that land; and (2) the project includes all possible planning to minimize harm to the park, recreation area, wildlife and waterfowl refuge, or historic site resulting from the use; or the use of the property will have a *de minimis* impact.

The purpose of this letter is two-fold: 1) to request that the National Park Service (NPS) make a determination as to whether the GWMP is a significant property in their system, and; 2) to request concurrence from the NPS regarding certain aspects of compliance with Section 4(f), namely, (a) that the temporary occupancy not to exceed 1.3 acres of the GWMP would be minor and not permanently adverse, and that there would be no interference with the activities, features, or attributes that qualify the property for protection under Section 4(f) either on a temporary or permanent basis; and, (b) that the permanent easement not to exceed approximately 0.9 acres of the GWMP will not adversely affect the activities, features and attributes that qualify the property for protection under Section 4(f). If the NPS concurs with this determination, it is FHWA's intent to 1) determine that the temporary occupancy not to exceed approximately 1.3 acres does not constitute a Section 4(f) use, and 2) make a Section 4(f) *de minimis* finding for the permanent easement not to exceed approximately 0.9 acres of the GWMP pursuant to 23 CFR 774.3(b).

#### **DETERMINATION OF SIGNIFICANCE**

Section 4(f) applicability for a public park, recreation area, or wildlife or waterfowl refuge requires a determination by the officials with jurisdiction over the property as to whether the property is significant. In the absence of this determination, the Section 4(f) property would be presumed to be significant and Section 4(f) would apply. If the officials having jurisdiction over the resource conclude that the entire property is not significant, then the provisions of Section 4(f) would not apply.

#### **TEMPORARY OCCUPANCY**

Planning-level estimates indicate a temporary construction easement not to exceed approximately 1.3 acres would be needed for construction. A definitive calculation will be completed when more detailed design information is available. According to FHWA's regulations implementing Section 4(f), a temporary occupancy of Section 4(f) land does not constitute "use" under Section 4(f) if the following conditions are met (23 CFR 774.13(d)):

1. **Duration (of the occupancy) must be temporary (i.e., less than the time needed for construction of the project) and there should be no change in ownership of the land –**

Occupancy, construction, and required access within the GWMP would take only as long as necessary, which would be less than the time needed to build the entire facility.

A temporary easement to permit construction within a portion of the GWMP will be effective only for the time needed to perform the work within the GWMP property and will not be used to provide staging or construction access to other portions of the project. There will be no change in ownership of the GWMP land involved in the temporary easement for construction.

Following conclusion of the Section 4(f) review and the issuance of the NEPA decision document, the NPS is anticipated to issue the Design-Build contractor a Special Use Permit for any temporary construction impacts or equipment access prior to work commencing on park lands.

2. **Scope of the work must be minor (i.e., both the nature and the magnitude of the changes are minimal) –**

Both the nature and the magnitude of the changes to the property will be minimal. Existing shrubs and grasses may be cleared. Temporary erosion and sediment controls will be installed and maintained throughout the duration of the construction to prevent soil erosion and to manage stormwater runoff. Areas that can support vegetation will be revegetated in accordance with the stipulations under the Proposed Mitigation and Minimization section below.

3. **There are no anticipated permanent adverse physical impacts, nor will there be interference with the protected activities, features, or attributes of the property that qualify the property for protection under Section 4(f), on either a temporary or permanent basis –**

The proposed temporary construction easement is not anticipated to have permanent adverse impacts nor permanent or temporary interference on the activities or purpose of the GWMP. Land that is disturbed will be revegetated in accordance with the stipulations under the Proposed Mitigation and Minimization section below after construction is complete.

4. **The land being used must be fully restored (i.e., the property must be returned to a condition which is at least as good as that which existed prior to the project) –**

The lands subject to any temporary construction easement will be returned to a natural condition which is at least as good as that which existed prior to project construction. The GWMP will be revegetated in accordance with the stipulations listed under the Proposed Mitigation and Minimization section below.

**5. There must be a documented agreement from the NPS regarding the above conditions**

Signature and return of this concurrence document to VDOT will satisfy this final condition.

VDOT believes the proposed temporary occupancy of the GWMP does not constitute a use under Section 4(f) based on the above. We request that the NPS concur in writing with our assessment of the conditions outlined above using the signature block at the end of this letter.

***DE MINIMIS IMPACTS***

Based on preliminary calculations, the proposed design for the project is anticipated to require a permanent easement not to exceed approximately 0.9 acres of GWMP. The area from which the easement would be acquired abuts the existing GWMP eastbound lanes and incorporates the removal of vegetation necessary for the construction of the tie-in and fly-over ramps (located outside the GWMP boundary). Acquisition of this easement would not adversely affect the activities, features, or attributes of the Section 4(f) property. A definitive calculation would be completed once more detailed design information is available.

As noted above, Section 4(f) requirements may be met if FHWA determines that the use of the property will have a *de minimis* impact. In order for FHWA to make such a determination for publicly owned parks, recreation areas, and wildlife or waterfowl refuges:

**1. The project must not adversely affect activities, features, or attributes of the Section 4(f) property –**

Acquisition of this easement would not adversely affect the activities, features, or attributes of the Section 4(f) property.

The public will maintain the ability to use the GWMP for scenic recreational driving as well as for the visitation to the GWMP's associated recreational features (trails, parks or scenic vistas). Access to all of these recreational features (scenic driving, trails, parks or scenic vistas) would be maintained at all times by the Design-Build contractor. Minor changes in noise levels could occur due to closer proximity of highway right-of-way and visual quality due to vegetation clearing.

Where appropriate, existing I-495 guide signage would be consolidated to reduce the overall number of signs appearing in one area of the GWMP, while in one new location a new guide sign would be added to the existing viewshed. Views of the Potomac River and Potomac Palisades will be maintained with no impact to existing viewsheds. VDOT will also implement Option 1 from the *February 2020 Visualization Booklet* along with the other conditions highlighted in the Efforts to Minimize Harm and Mitigate Impacts Section below.

For permanent easement impacts, a highway deed easement would be executed between FHWA and NPS in accordance with 23 CFR 107.

2. **There must be public notice and opportunity for public review and comment concerning the effects on the protected activities, features, or attributes of the property that qualify the property for Section 4(f) protection** –

VDOT provided the public with the opportunity to review and comment on the effects of the proposed de minimis impact during the October 5, 2020 and October 8, 2020 Public Hearing. Comments received from the public following the Public Hearing stated that coordination with the NPS was necessary due to the LOD encompassing portions of the GWMP.

3. **Officials with jurisdiction over the park must concur that the project will not adversely affect the activities, features, or attributes of the GWMP.** –

Signature and return of this concurrence document to VDOT will satisfy this criterion.

### **PROPOSED MITIGATION AND MINIMIZATION**

Based on on-going coordination efforts between VDOT, the NPS and the Virginia Department of Historic Resources (SHPO), the following measures to minimize harm and mitigate impacts to the GWMP have been identified. These conditions were agreed upon via letter by VDOT and the SHPO (VDHR) on January 21, 2021 (see Exhibit 1 attached to the Letter):

- VDOT shall include design constraints in the Request for Proposals requiring the Design-Build contractor to remain within the current LOD where possible in designing and constructing project improvements in the vicinity of Archaeological Sites 44FX0374, 44FX0379, 44FX0389, and 44FX2430. VDOT shall ensure that the Concessionaire (Design-Build contractor) includes a Special Provision in the contract requiring that safety fencing is erected along the LOD to ensure avoidance of any ground disturbance to Sites 44FX0374, 44FX0379, 44FX0389, or 44FX2430 during construction of the project, or by construction vehicles entering and leaving the project corridor.
- VDOT shall implement Option 1 as presented in the *February 2020 Visualization Booklet* and selected by the SHPO and the NPS as the preferred option for the I-495 NEXT project.
- VDOT shall construct any infrastructure, such as retaining walls on NPS lands (if required and approved by NPS), associated with the NPS-selected gateway Option 1 in accordance with NPS specifications.
- VDOT shall install any necessary plantings on NPS lands associated with the NPS-selected gateway option in accordance with NPS specifications.
- VDOT shall minimize the amount of forest removal and mitigate for forest removal deemed necessary to implement Option 1.
- VDOT shall coordinate with NPS regarding the design and location of the signage to be installed within the GWMP for the I-495 NEXT project.
- VDOT shall consult with the GWMP and the SHPO at major milestones in project design to ensure the design remains consistent with these conditions to avoid adverse effects on the GWMP.
- On-going design minimization efforts to reduce the project's physical project footprint and impervious surface area within the GWMP boundary.



Superintendent Cuvelier

March 24, 2021

Page 6 of 6

- Continued collaboration with the NPS on potential enhancements to the visitor's "sense of arrival" including potentially relocating the GWMP entrance sign to a more prominently visible location within the park.
- Preparation of several preliminary design concepts and viewshed visualizations of potential projects impacts at the park boundary interface. This information was provided to the NPS in meetings on December 12, 2019 and January 23, 2019 and refined for submittal on February 6, 2020; the potential concepts and visualizations are included for review in Appendix A of this document.
- Completion of a tree survey in the vicinity of the eastbound GWMP lanes, with a commitment to minimize impacts to mature and healthy trees, and to restore vegetation disturbed by construction (including the use of native seed mix and re-planting of trees per NPS's tree replacement ratio of 1:1).
- On-going efforts to consolidate/reduce existing I-495 guide signage within the westbound lanes of the GWMP.
- Replacement of guide signing for the GWMP on the Capital Beltway to include new sign elements with brown backgrounds.
- Location of the Virginia toll signing outside of the park boundary.

VDOT believes the permanent easement will not adversely affect the activities, features, or attributes of the GWMP and requests that NPS concur with this determination using the signature block at the end of this letter.

If you concur with our assessment, please return the signed concurrence block at the end of this letter at your earliest convenience, but by no later than April 7, 2021. If you have any questions or need additional information, please do not hesitate to contact me at (703) 259-3345 or by email at [Abraham.Lerner@vdot.virginia.gov](mailto:Abraham.Lerner@vdot.virginia.gov). I appreciate your assistance and prompt attention to this matter.

Sincerely,



Digitally signed by Abraham Lerner  
DN: C=US, E=abraham.lerner@vdot.virginia.gov, O=VDOT,  
OU=Virginia MegaProjects, CN=Abraham Lerner  
Date: 2021.03.24 17:43:25-04'00'

Abraham Lerner, P.E.

VDOT Special Project Development Associate Manager

Northern Virginia District

cc: John Simkins, FHWA  
Susan Shaw, P.E., VDOT  
Scott Smizik, VDOT  
Robert Iosco, VDOT

#### Attachments

Figure 1: Section 4(f) Impacts Related to the George Washington Memorial Parkway

Exhibit 1: Determination of Effect Letter- Virginia Department of Historic Resources- Dated January 14, 2021

**National Park Service Significance Determination and Final Concurrence with the Section 4(f) Applicability Criteria for *de minimis* Impact to the George Washington Memorial Parkway**

For the proposed northern extension of Interstate 495 (VDOT Project #0495-029-419, P101, UPC #113414) from the current northern terminus of the existing Express Lanes in the vicinity of the Old Dominion Drive overpass to the George Washington Memorial Parkway (GWMP) in the McLean area of Fairfax County, Virginia, the National Park Service (NPS) has determined that the GWMP is a significant property in their system. NPS concurs that the temporary occupancy of 1.3 acres for construction is minor and will not cause permanently adverse physical impacts to, nor interfere with the protected activities, features, or attributes of the GWMP that qualify it for protection under Section 4(f), either on a temporary or permanent basis. NPS further concurs that a permanent easement of approximately 0.9 acres of property will not permanently adversely affect the GWMP property. NPS further concurs that, based upon current design information and the commitment on the part of VDOT to minimize disturbance within the GWMP, impacts to GWMP property that could be expected to result from the project will not adversely affect activities, features, or attributes of the GWMP property. NPS hereby acknowledges that VDOT provided notice and opportunity for public review and comment, consistent with federal guidelines. This concurrence does not constitute an endorsement of the project or conveyance of any temporary or permanent interests in or access to the GWMP. This concurrence is provided with the understanding that further design information is to be provided to NPS by VDOT during project development and that further consultation with NPS will be undertaken by VDOT to ensure that, prior to granting of any temporary or permanent property interests, harm to park property by the proposed project will be minimized and the conditions upon which this concurrence is based have not changed.

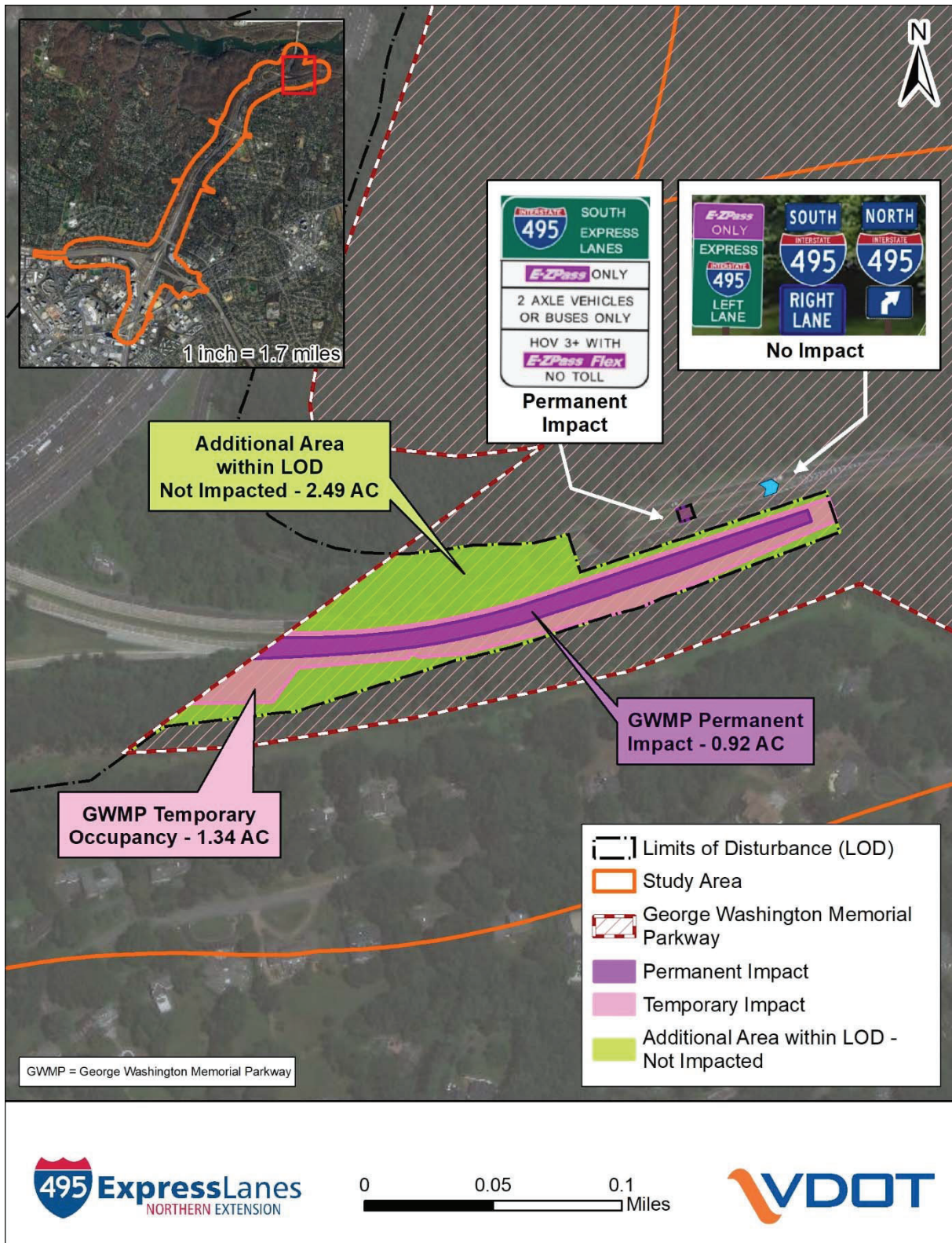
\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Charles Cuvelier  
Printed Name

\_\_\_\_\_  
Superintendent  
Title

Figure 1: Section 4(f) Impacts Related to the George Washington Memorial Parkway





**Exhibit 1: Determination of Effect Letter- Virginia Department of Historic Resources-  
Dated January 14, 2021**



COMMONWEALTH of VIRGINIA

DEPARTMENT OF TRANSPORTATION  
1401 EAST BROAD STREET  
RICHMOND, VIRGINIA 23219-2000

Stephen C. Brich, P.E.  
COMMISSIONER

January 14, 2021

ROUTE: I-495  
PROJECT: 0495-029-419, P101; UPC: 113414  
COUNTY/CITY: Fairfax County  
FUNDING: Federal  
VDHRFILE: 2018-0473  
ACTION REQUIRED: Determination of Effect

Ms. Julie V. Langan, Director  
Attn.: Mr. Marc Holma, Office of Review and  
Compliance Virginia Department of Historic Resources  
2801 Kensington Avenue  
Richmond, VA 23221

Dear Mr. Holma:

The Virginia Department of Transportation (VDOT) is studying proposed improvements to I-495 between Dulles Toll Road (Route 267) and the George Washington Memorial Parkway interchange in the vicinity of the American Legion Bridge. On behalf of the Federal Highway Administration (FHWA), VDOT has coordinated this federally-funded project, called the I-495 NEXT project, with the Virginia Department of Historic Resources (VDHR/Virginia SHPO) since 2018 in accordance with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended, and its implementing regulations, 36 CFR Part 800. Current design plans indicate that the proposed project has been revised to include additional improvements that extend beyond the limits of the APE as it was originally defined. **The purpose of this letter is to coordinate an effect determination for the cultural resources that fall within the revised Area of Potential Effect (APE) for the I-495 NEXT project.**

VDOT maintains that cultural resource work completed for this project meets the standards set forth in both the Secretary of Interior's Standards and Guidelines (1983) and the VDHR Guidelines for Conducting Historic Resource Surveys in Virginia (May 2011) with reference to the *Programmatic Agreement among the Federal Highway Administration, the U.S. Army Corps*



Page 2 of 7  
Marc Holma  
14 January 2021

*of Engineers, Norfolk District, the Tennessee Valley Authority, the Advisory Council on Historic Preservation, the Virginia State Historic Preservation Office and the Virginia Department of Transportation Regarding Transportation Undertakings Subject to Section 106 of the National Historic Preservation Act of 1966, executed August 2, 2016 (2016 Federal PA).*

### **Project Overview**

VDOT, in coordination with the Federal Highway Administration (FHWA) as the lead federal agency, is preparing an Environmental Assessment (EA) for the proposed project. The study will evaluate the potential extension of the existing High Occupancy Toll (HOT) lanes from their current northern terminus at the Dulles Toll Road (Route 267) to the George Washington Memorial Parkway interchange in the vicinity of the American Legion Bridge.<sup>1</sup> The extension of HOT lanes are primarily located within existing right-of-way (ROW). The purpose for the study focuses on reducing congestion, providing additional travel choices, and improving travel reliability. The APE for archaeological resources is defined by the project's limits of disturbance (LOD); the APE for architectural resources includes the vicinity where alterations to historic feeling and setting may occur.

Cultural Heritage Group (CHG) conducted cultural resources survey of the vast majority of the APE for this project in April 2019 and May 2019. On July 30, 2019, VDOT coordinated with your office the results of this initial survey, as well as the eligibility of architectural resources located within the entire APE and the eligibility of archaeological resources located within portions of the APE that fall outside the boundaries of the GWMP. VDHR concurred with the findings of this study on August 14, 2019.

As you are aware, the I-495 NEXT project is contiguous with the I-495 & I-270 Managed Lanes Study (MLS) in Maryland. On behalf of the Maryland State Highway Administration (MSHA) and VDOT, TRC Environmental Group (TRC) conducted archaeological survey of the portions of the MLS and the portions of the I-495 NEXT projects that fall within the GWMP from July 8-17, 2019. These survey efforts were combined to more efficiently identify archaeological resources under a single permit (19-GWMP-5), which is required under the Archeological Resources Protection Act (ARPA) to conduct archaeological excavations on federal land. VDOT coordinated the results of the TRC survey with VDHR on October 30, 2019, and VDHR concurred with the findings on November 20, 2019. Since the initial coordination, the MSHA requested that the NPS comment on the eligibility of the Deep Run Ridges Archaeological Historic District. In September 2020, the NPS concurred with the MSHA that Archaeological Sites 44FX0374, 44FX0381, and 44FX0389 are contributing sites to the Dead Run Ridges Archaeological Historic District (44FX3922).

### **Assessment of Effect**

#### *Architecture*

Based on current design, only one architectural historic property, the George Washington

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<sup>1</sup> The project is administered as a Public-Private Partnership (P-3) between VDOT and a P-3 concessionaire. The concessionaire will be responsible for constructing the project and procuring a design-builder. VDOT shall ensure that the Section 106 commitments identified in this letter are carried out by the concessionaire through VDOT's review and concurrence responsibilities in its partnership with the concessionaire.

Page 3 of 7  
Marc Holma  
14 January 2021

Memorial Parkway (GWMP) (VDHR No. 029-0228), falls within the project APE. The Georgetown Pike (VDHR No. 029-0466) is in the vicinity of the APE; however the 0.53 mile section at the I-495 Interchange does not contribute to and is not included within the NRHP listed portion of the Georgetown Pike. The Tysons Corner Mall (VDHR No. 029-6464) does fall within the APE for indirect effects. However, the proposed project will not directly impact Tysons Corner Mall, nor will it alter the existing feeling and setting of the resource. Therefore, VDOT maintains that the proposed project will have no effect on the Tysons Corner Mall.

With regard to the GWMP, VDOT's assessment of effect has been informed by two documents: the NRHP nomination for the GWMP prepared by the NPS in 1995 and the Cultural Landscape Inventory (CLI) for the North Parkway published by the NPS in 2009. The NRHP nomination specifically excludes the I-495/GWMP interchange from the defined historic property, and most project elements are located within that excluded interchange. In addition, the CLI identifies certain aspects of the North Parkway that are important landscape elements including views of the Potomac Palisades, stone walls, the tree canopy and the configuration of the Parkway itself. Of those elements, only the tree canopy and the Parkway's configuration are within the project's APE. Alteration of the canopy will occur only as a result of the four gateway options in an area that had minimal forest cover during the GWMP's period of significance defined in the NRHP nomination (see Attachment: *George Washington Memorial Parkway Visualization Booklet*, page 8).<sup>2</sup> Further, the overall configuration of the Parkway itself will be altered only by extending the existing merge taper for a distance of approximately 1150 feet within the NRHP boundaries of the GWMP. It is VDOT's opinion that neither of these alterations to character-defining features of the GWMP rise to the level of diminishing those features.

#### *Archaeology*

Although the Dead Run Ridges Archaeological District (44FX3922) is located within the APE for archaeological resources, the APE does not extend within any of the archaeological resources that contribute to the NRHP eligibility of the district, and no other archaeological sites eligible for or listed on the NRHP are located within the APE for archaeological resources (Figure 3). Three NRHP-eligible archaeological sites (44FX0374, 44FX0379, and 44FX0389) and one unevaluated archaeological site (44FX2430), however, are located immediately adjacent to the Project LOD.

#### *Proposed Design*

The VDOT design team worked closely with the NPS and consulting parties in order to develop a project that considers the setting and feeling of the GWMP. The goal behind the design is to minimize the visual and physical impact to the GWMP, while incorporating elements of design that creates a gateway entrance to the GWMP off I-495. Early in the Section 106 process, the NPS stated that a design clearly identifying the GWMP to drivers exiting I-495 was preferred. To meet this request, the design consultant presented a *George Washington Memorial Parkway Visualization Booklet* (the Booklet) at the February 6, 2020 consulting parties meeting (a copy of the Booklet is included with this correspondence). The Booklet presents a design concept that addresses the NPS's desire for a clear gateway to the GWMP, proposed directional signage to I-

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<sup>2</sup> The *Visualization Booklet*, dated February 6, 2020, is an Attachment to this letter by reference. It was distributed to all the consulting parties and is not physically attached. If additional copies are needed, please contact VDOT.

495 from the GWMP, and the merging of the express lanes and general purpose lanes from I-495 from the south onto the GWMP. VDOT maintains that the design options presented in the Booklet minimize the effect of the I-495 NEXT project to the GWMP. While the proposed project may alter the setting and feeling of the GWMP, the project does not diminish any aspects of integrity that contribute to the significance of the resource.

The Booklet outlines four gateway options for traffic traveling from the express lanes and general purpose lanes from I-495 onto the GWMP. Three of the options involve the construction of a stone-faced retaining wall, while one option proposes an alteration by laying back the slope to the south of the GWMP. The VDOT presented the VDHR an opportunity to review and comment on the four design options presented in the Booklet. In an April 2020 letter the VDHR expressed their preference for Option 1, the option that proposes to lay back the slope to the south of the GWMP versus the other three options. The VDHR maintains that Option 1 is the preferred option because it will not result in the introduction of new features on the landscape. However, the VDHR withheld their decision on a final effect determination for the project in order to give the NPS an opportunity to review and comment on the four options presented in the Booklet.

In April 2020, the VDOT received a letter from the NPS stating that the agency agreed with VDOT's no adverse effect determination for the I-495 NEXT project provided that VDOT used Option 1 for the project. In an October 2020 letter, the NPS provided additional guidance and conditions to support the no adverse effect determination. In the October 2020 letter, the NPS requested that the VDOT minimize loss of forest and mitigate for any loss of vegetation in the vicinity where I-495 connects with the GWMP. Further, the NPS recommends that sound wall treatments on VDOT property complement existing walls and architecture along the GWMP.

In an attempt to support the no adverse effect determination for the I-495 NEXT project, VDOT shall commit to the following conditions. The VDOT shall utilize Option 1, as described in the Booklet, at the entrance to the GWMP off I-495. The landscaping completed for the project shall meet NPS standards and specifications, apply the minimization and mitigations efforts requested by the NPS, as well as incorporate the results of the tree survey already completed for this project. VDOT shall consult with the NPS and consulting parties to ensure that the NPS-selected gateway design concept will avoid any adverse effects to the GWMP. VDOT shall develop a major milestones design review schedule in consultation with the Virginia SHPO, the NPS and other consulting parties. The major milestones design review schedule shall include at least two interim submissions for review.



Page 5 of 7  
Marc Holma  
14 January 2021

**Determination of Effect**

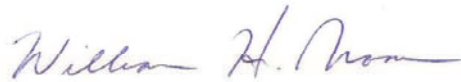
The implementing regulations of Section 106 of the NHPA define an effect as an “alteration to the characteristics of a historic property qualifying it for inclusion in or eligible for the National Register” [36CFR800.16 (i)]. The effect is adverse only when the alteration of a qualifying characteristic occurs in a “manner that would diminish the integrity of the property’s location, design, setting, materials, workmanship, feeling, or association” [36CFR800.5 (a)]. VDOT Cultural Resources staff have reviewed the plans for this project, which reflect VDOT’s concerted efforts to minimize and avoid impacts to historic properties, as documented in part by the Booklet, and have determined that the project as proposed will alter but not diminish the integrity of historic properties within the project’s APE. As such, VDOT has determined that the revised design of the I-495 NEXT Project will have No Adverse Effect on historic properties in accordance with 36 CFR 800.5(b), provided that conditions are imposed and implemented to avoid adverse effects on the GWMP (VDHR No.: 029-0228) and the Dead Run Ridges Archaeological District (44FX3922), as well as its contributing resources Archaeological Sites 44FX0374, 44FX0379, 44FX0389, and 44FX2430 (see discussion above and concurrence page).

VDOT looks forward to receiving any comments you or other consulting parties may have about these findings. We ask that comments be provided within 30 days of receipt of this letter. If the Virginia SHPO concurs with VDOT’s findings, we invite you to complete the signature block below and return it to my attention. Please contact Sarah at (804) 371-6710, [Sarah.Clarke@VDOT.virginia.gov](mailto:Sarah.Clarke@VDOT.virginia.gov), or Will at (804) 786-2852, [William.Moore@VDOT.virginia.gov](mailto:William.Moore@VDOT.virginia.gov), if you have questions about this project.

Sincerely,



Sarah M. Clarke  
Environmental Program Planner  
Cultural Resources



William H. Moore  
Environmental Program Planner  
Cultural Resources



Page 6 of 7

**Marc Holma**

**14 January 2021**

- c. Fairfax County History Commission
  - Tammy Stidham, National Park Service, National Capital Region
  - Charles Cuvelier, Superintendent, George Washington Memorial Parkway
  - Maureen Joseph, George Washington Memorial Parkway
  - Steve Archer, Maryland State Highway

\*\*\*\*\*

The Virginia Department of Historic Resources (VDHR) concurs with the Virginia Department of Transportation (VDOT) that:

- No further cultural resources survey is warranted at this time. VDOT shall monitor design efforts and consult with the Virginia SHPO and other consulting parties should additional survey efforts be necessary.
- The project as proposed will have No Adverse Effect on historic properties, provided the following conditions to avoid adverse effects are implemented:
  - VDOT shall include design constraints in the Request for Proposals requiring the design-builder to remain within the current LOD where possible in designing and constructing project improvements in the vicinity of Archaeological Sites 44FX0374, 44FX0379, 44FX0389, and 44FX2430. VDOT shall ensure that the Concessionaire includes a Special Provision in the design-build contract with the design-builder, requiring that safety fencing is erected along the LOD to ensure avoidance of any ground disturbance to Sites 44FX0374, 44FX0379, 44FX0389, or 44FX2430 during construction of the project, or by construction vehicles entering and leaving the project corridor.
  - VDOT shall implement Option 1 as presented in the *George Washington Memorial Parkway Visualization Booklet* dated February 6, 2020 and selected by the VA SHPO and the NPS as the preferred option for the I-495 NEXT project.
  - VDOT shall construct any infrastructure, such as retaining walls on NPS lands (if required and approved by NPS), associated with the NPS-selected gateway Option 1 in accordance with NPS specifications.
  - VDOT shall install any necessary plantings on NPS lands associated with the NPS-selected gateway option in accordance with NPS specifications.
  - VDOT shall minimize the amount of forest removal and mitigate for forest removal deemed necessary to implement Option 1.
  - VDOT shall coordinate the design and location of the signage to be installed within the George Washington Memorial Parkway for the I-495 NEXT project with the NPS.
  - VDOT shall consult with the GWMP and the Virginia SHPO at major milestones in project design to ensure the design remains consistent with these conditions to avoid adverse effects on the GWMP.

For VDOT Project No. 0495-029-419, P101; UPC: 113414; VDHR File No.: 2018-0473.

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Julie V. Langan  
Director, Virginia Department of Historic Resources  
Virginia State Historic Preservation Officer

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Date

\*\*\*\*\*

The Virginia Department of Historic Resources (VDHR) concurs with the Virginia Department of Transportation (VDOT) that:

- No further cultural resources survey is warranted at this time. VDOT shall monitor design efforts and consult with the Virginia SHPO and other consulting parties should additional survey efforts be necessary.
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  - VDOT shall coordinate the design and location of the signage to be installed within the George Washington Memorial Parkway for the I-495 NEXT project with the NPS.
  - VDOT shall consult with the GWMP and the Virginia SHPO at major milestones in project design to ensure the design remains consistent with these conditions to avoid adverse effects on the GWMP.

For VDOT Project No. 0495-029-419, P1O1; UPC: 113414; VDHR File No.: 2018-0473.

  
Julie V. Langan  
Director, Virginia Department of Historic Resources  
Virginia State Historic Preservation Officer

21 Jan 2021  
Date

Matthew J. Strickler  
Secretary of Natural Resources

Clyde E. Cristman  
Director



Rochelle Altholz  
Deputy Director of  
Administration and Finance

Russell W. Baxter  
Deputy Director of  
Dam Safety & Floodplain  
Management and Soil & Water  
Conservation

Nathan Burrell  
Deputy Director of  
Government and Community Relations

Thomas L. Smith  
Deputy Director of  
Operations

**COMMONWEALTH of VIRGINIA**  
DEPARTMENT OF CONSERVATION AND RECREATION

October 22, 2020

Abi Lerner, P.E.  
Virginia Department of Transportation  
4975 Alliance Drive  
Fairfax, VA 22030

Re: I-495 Express Lanes Northern Extension Project

Dear Ms. Lerner:

The Department of Conservation and Recreation's Division of Natural Heritage (DCR) has searched its Biotics Data System for occurrences of natural heritage resources from the area outlined on the submitted map. Natural heritage resources are defined as the habitat of rare, threatened, or endangered plant and animal species, unique or exemplary natural communities, and significant geologic formations.

According to the information currently in our files, the Potomac Gorge Conservation Site is located within the project site. Conservation sites are tools for representing key areas of the landscape that warrant further review for possible conservation action because of the natural heritage resources and habitat they support. Conservation sites are polygons built around one or more rare plant, animal, or natural community designed to include the element and, where possible, its associated habitat, and buffer or other adjacent land thought necessary for the element's conservation. Conservation sites are given a biodiversity significance ranking based on the rarity, quality, and number of element occurrences they contain; on a scale of 1-5, 1 being most significant. The Potomac Gorge Conservation Site has been given a biodiversity significance ranking of B1, which represents a site of outstanding significance. The natural heritage resources of concern at this site are:

<i>Maianthemum stellatum</i>	Starry Solomon's-plume	G5/S1S2/NL/NL
<i>Phacelia covillei</i>	Coville's phacelia	G3/S1/NL/NL
<i>Gomphus fraternus</i>	Midland Clubtail	G5/S2/NL/NL
<i>Boechera dentata</i>	Short's rock cress	G5/S1/NL/NL
<i>Silene nivea</i>	Snowy Champion	G4?/S1/NL/NL
<i>Gomphus fraternus</i>	Midland Clubtail	G5/S2/NL/NL
<i>Matteuccia struthiopteris var. pennsylvanica</i>	Ostrich Fern	G5T5/S1/NL/NL
Piedmont / Northern Coastal Plain Basic Seepage Swamp		G4G5/S2?/NL/NL
Central Appalachian / Piedmont Basic Mesic Forest (Twinleaf - Blue Cohosh Type)		G4G5/S4/NL/NL
Central Appalachian / Piedmont Low-Elevation Rich Boulderfield Forest		G3G4/S2S3/NL/NL
Coastal Plain / Outer Piedmont Basic Mesic Forest		G4?/ S3/NL/NL
Northern Coastal Plain / Piedmont Mesic Mixed Hardwood Forest		G5/S5/NL/NL

In addition, Tall Thistle (*Cirsium altissimum*, G5/S1/NL/NL), Wild cucumber (*Echinocystis lobata*, G5/SH/NL/NL), Smartweed Dodder (*Cuscuta polygonorum*, G5/S1/NL/NL), Northern rattlesnake-master



(*Eryngium yuccifolium* var. *yuccifolium*, G5T5/S2/NL/NL), One-sided shinleaf (*Orthilia secunda*, G5/SH/NL/NL) and Pizzini's Amphipod (*Stygobromus pizzinii*, G3G4/S1S2/NL/NL) have been historically documented within the project site.

Furthermore, according to a DCR biologist, there is potential for the Northern Virginia Well amphipod (*Stygobromus phreaticus*, G1/S1/SOC/NL) and other *Stygobromus* amphipod species to occur within the portion of the project site along the George Washington Memorial Parkway.

DCR recommends avoidance of impacts to documented occurrences of natural heritage resources by limiting the project footprint to the greatest extent possible, including along the steep bluff on the eastern side of I-495 along the Potomac River. Due to the potential for this site to support additional populations of natural heritage resources, DCR also recommends an inventory for the resources within areas proposed for disturbance including stormwater management ponds and equipment staging areas. With the survey results we can more accurately evaluate potential impacts to natural heritage resources and offer specific protection recommendations for minimizing impacts to the documented resources.

DCR-Division of Natural Heritage biologists are qualified and available to conduct inventories for rare, threatened, and endangered species. Please contact Anne Chazal, Natural Heritage Chief Biologist, at [anne.chazal@dcr.virginia.gov](mailto:anne.chazal@dcr.virginia.gov) or 804-786-9014 to discuss arrangements for fieldwork.

In addition, the Virginia DCR, Division of Natural Heritage karst staff screened this project against the Virginia Speleological Survey (VSS) database, the Virginia DMME sinkhole coverage, and other karst layers for documented sensitive karst features.

One documented cave is reported within the project area. Legion bridge Cave is reported at the following location:

38.9684980149° Latitude

-77.1816819068° Longitude

The entrance has the appearance of a nearly perfect equilateral triangle about four feet high. It is located about 15 feet from the edge of the river at normal flow. The cave is a pocket formed in the boulder pile at the bottom of a prominent cliff. It appears to have been used as a shelter by people in the past, likely anglers. The back of the cave has been modified with mortar and rock. This shelter cave is estimated to be about 15 feet long. Virginia DCR-DNH recommends that VDOT avoid this feature. The stabilization of the soil around the site should be prioritized during every phase of the project and all standard erosion control measures that are appropriate for the site should be used at all times to help reduce any potential impact to resources.

If karst features such as sinkholes, caves, disappearing streams, and large springs are encountered during the project, please coordinate with Wil Orndorff (540-230-5960, [Wil.Orndorff@dcr.virginia.gov](mailto:Wil.Orndorff@dcr.virginia.gov)) the Virginia DCR, Division of Natural Heritage Karst Protection Coordinator, to document and minimize adverse impacts. Activities such as discharge of runoff to sinkholes or sinking streams, filling of sinkholes, and alteration of cave entrances can lead to environmental impacts including surface collapse, flooding, erosion and sedimentation, contamination of groundwater and springs, and degradation of subterranean habitat for natural heritage resources (e.g. cave adapted invertebrates, bats). These potential impacts are not necessarily limited to the immediate project area, as karst systems can transport water and associated contaminants rapidly over relatively long distances, depending on the nature of the local karst system. If the project involves filling or "improvement" of sinkholes or cave openings, DCR would like detailed location information and copies of the design specifications. In cases where sinkhole improvement is for storm water discharge, copies of VDOT Form EQ-120 will suffice.

Furthermore, the proposed project will fragment two C4 Ecological Cores as identified in the Virginia Natural Landscape Assessment (<https://www.dcr.virginia.gov/natural-heritage/vaconvisvnl>), one of a suite of tools in Virginia Conservation Vision that identify and prioritize lands for conservation and protection.

Ecological Cores are areas of unfragmented natural cover with at least 100 acres of interior that provide habitat for a wide range of species, from interior-dependent forest species to habitat generalists, as well as species that utilize marsh, dune, and beach habitats. Cores also provide benefits in terms of open space, recreation, water quality (including drinking water protection and erosion prevention), and air quality (including carbon sequestration and oxygen production), along with the many associated economic benefits of these functions. The cores are ranked from C1 to C5 (C5 being the least ecologically relevant) using many prioritization criteria, such as the proportions of sensitive habitats of natural heritage resources they contain.

Fragmentation occurs when a large, contiguous block of natural cover is dissected by development, and other forms of permanent conversion, into one or more smaller patches. Habitat fragmentation results in biogeographic changes that disrupt species interactions and ecosystem processes, reducing biodiversity and habitat quality due to limited recolonization, increased predation and egg parasitism, and increased invasion by weedy species.

Therefore minimizing fragmentation is a key mitigation measure that will preserve the natural patterns and connectivity of habitats that are key components of biodiversity. The deleterious effects of fragmentation can be reduced by minimizing edge in remaining fragments; by retaining natural corridors that allow movement between fragments; and by designing the intervening landscape to minimize its hostility to native wildlife (natural cover versus lawns).

Many invasive plant species are adapted to take advantage of soil disturbances and poor soil conditions. These adaptations are part of what enable certain species to be invasive. Non-native invasive plants are found through Virginia. Therefore, the potential exists for some VDOT projects to further the establishment of invasive species. To minimize the potential for invasive species infestation, projects should be conducted to minimize the area of disturbance, and disturbed sites should be revegetated with desirable species at the earliest opportunity following disturbance. Equally as important, species used for revegetation should not include the highly invasive species that have traditionally been used for revegetating disturbed sites. We recommend VDOT avoid using crown vetch, tall fescue, and autumn olive if at all possible.

For more information on invasive alien plants and native plants, see the DCR-Division of Natural Heritage website <http://www.dcr.virginia.gov/natural-heritage/invspinfo.shtml>. For sources of native plant material, see the Virginia Native Plant Society's website (<http://vnps.org>) or the U.S. Fish and Wildlife Service nursery list for Virginia (<http://www.fws.gov/ChesapeakeBay/BayScapes/bsresources/bs-nurseries.html>).

Under a Memorandum of Agreement established between the Virginia Department of Agriculture and Consumer Services (VDACS) and the DCR, DCR represents VDACS in comments regarding potential impacts on state-listed threatened and endangered plant and insect species. The current activity will not affect any documented state-listed plants or insects.

There are no State Natural Area Preserves under DCR's jurisdiction in the project vicinity.

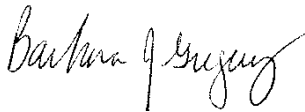
New and updated information is continually added to Biotics. Please re-submit a completed order form and project map for an update on this natural heritage information if the scope of the project changes and/or six months has passed before it is utilized.

All VDOT projects on state-owned lands must comply with the Virginia Erosion & Sediment Control (ESC) Law and Regulations, the Virginia Stormwater Management (SWM) Law and Regulations, the most current version of the DCR approved VDOT Annual ESC and SWM Specifications and Standards, and the project-specific ESC and SWM plans. [Reference: VESCL §10.1-560, §10.1-564; VESCR §4VAC50-30 et al; VSWML §10.1-603 et al; VSWMR §4VAC-3-20 et al].

The Virginia Department of Wildlife Resources (VDWR) maintains a database of wildlife locations, including threatened and endangered species, trout streams, and anadromous fish waters that may contain information not documented in this letter. Their database may be accessed from <http://vafwis.org/fwis/> or contact Ernie Aschenbach at 804-367-2733 or [Ernie.Aschenbach@dwr.virginia.gov](mailto:Ernie.Aschenbach@dwr.virginia.gov).

Should you have any questions or concerns, please contact me at 804-225-2821. Thank you for the opportunity to comment on this project.

Sincerely,



Barbara Gregory  
Senior Project Review Assistant

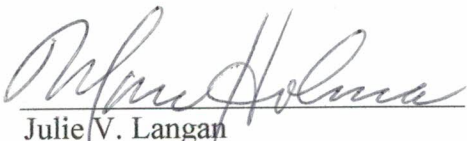
Cc: Troy Andersen, USFWS  
Wil Orndorff, DCR-Karst

\*\*\*\*\*

The Virginia Department of Historic Resources (VDHR) concurs with the Virginia Department of Transportation (VDOT) that:

- No further cultural resources survey is warranted at this time. VDOT shall monitor design efforts and consult with the Virginia SHPO and other consulting parties should additional survey efforts be necessary.
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  - VDOT shall consult with the GWMP and the Virginia SHPO at major milestones in project design to ensure the design remains consistent with these conditions to avoid adverse effects on the GWMP.

For VDOT Project No. 0495-029-419, P101; UPC: 113414; VDHR File No.: 2018-0473.

  
Julie V. Langan

Director, Virginia Department of Historic Resources  
Virginia State Historic Preservation Officer

21 Jan 2021  
Date





# COMMONWEALTH of VIRGINIA

DEPARTMENT OF TRANSPORTATION  
1401 EAST BROAD STREET  
RICHMOND, VIRGINIA 23219-2000

**Stephen C. Brich, P.E.**  
COMMISSIONER

January 14, 2021

ROUTE: I-495  
PROJECT: 0495-029-419, P10I; UPC: 113414  
COUNTY/CITY: Fairfax County  
FUNDING: Federal  
VDHRFILE: 2018-0473  
ACTION REQUIRED: Determination of Effect

Ms. Julie V. Langan, Director  
Attn.: Mr. Marc Holma, Office of Review and  
Compliance Virginia Department of Historic Resources  
2801 Kensington Avenue  
Richmond, VA 23221

Dear Mr. Holma:

The Virginia Department of Transportation (VDOT) is studying proposed improvements to I-495 between Dulles Toll Road (Route 267) and the George Washington Memorial Parkway interchange in the vicinity of the American Legion Bridge. On behalf of the Federal Highway Administration (FHWA), VDOT has coordinated this federally-funded project, called the I-495 NEXT project, with the Virginia Department of Historic Resources (VDHR/Virginia SHPO) since 2018 in accordance with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended, and its implementing regulations, 36 CFR Part 800. Current design plans indicate that the proposed project has been revised to include additional improvements that extend beyond the limits of the APE as it was originally defined. **The purpose of this letter is to coordinate an effect determination for the cultural resources that fall within the revised Area of Potential Effect (APE) for the I-495 NEXT project.**

VDOT maintains that cultural resource work completed for this project meets the standards set forth in both the Secretary of Interior's Standards and Guidelines (1983) and the VDHR Guidelines for Conducting Historic Resource Surveys in Virginia (May 2011) with reference to the *Programmatic Agreement among the Federal Highway Administration, the U.S. Army Corps*

*of Engineers, Norfolk District, the Tennessee Valley Authority, the Advisory Council on Historic Preservation, the Virginia State Historic Preservation Office and the Virginia Department of Transportation Regarding Transportation Undertakings Subject to Section 106 of the National Historic Preservation Act of 1966, executed August 2, 2016 (2016 Federal PA).*

### **Project Overview**

VDOT, in coordination with the Federal Highway Administration (FHWA) as the lead federal agency, is preparing an Environmental Assessment (EA) for the proposed project. The study will evaluate the potential extension of the existing High Occupancy Toll (HOT) lanes from their current northern terminus at the Dulles Toll Road (Route 267) to the George Washington Memorial Parkway interchange in the vicinity of the American Legion Bridge.<sup>1</sup> The extension of HOT lanes are primarily located within existing right-of-way (ROW). The purpose for the study focuses on reducing congestion, providing additional travel choices, and improving travel reliability. The APE for archaeological resources is defined by the project's limits of disturbance (LOD); the APE for architectural resources includes the vicinity where alterations to historic feeling and setting may occur.

Cultural Heritage Group (CHG) conducted cultural resources survey of the vast majority of the APE for this project in April 2019 and May 2019. On July 30, 2019, VDOT coordinated with your office the results of this initial survey, as well as the eligibility of architectural resources located within the entire APE and the eligibility of archaeological resources located within portions of the APE that fall outside the boundaries of the GWMP. VDHR concurred with the findings of this study on August 14, 2019.

As you are aware, the I-495 NEXT project is contiguous with the I-495 & I-270 Managed Lanes Study (MLS) in Maryland. On behalf of the Maryland State Highway Administration (MSHA) and VDOT, TRC Environmental Group (TRC) conducted archaeological survey of the portions of the MLS and the portions of the I-495 NEXT projects that fall within the GWMP from July 8-17, 2019. These survey efforts were combined to more efficiently identify archaeological resources under a single permit (19-GWMP-5), which is required under the Archeological Resources Protection Act (ARPA) to conduct archaeological excavations on federal land. VDOT coordinated the results of the TRC survey with VDHR on October 30, 2019, and VDHR concurred with the findings on November 20, 2019. Since the initial coordination, the MSHA requested that the NPS comment on the eligibility of the Deep Run Ridges Archaeological Historic District. In September 2020, the NPS concurred with the MSHA that Archaeological Sites 44FX0374, 44FX0381, and 44FX0389 are contributing sites to the Dead Run Ridges Archaeological Historic District (44FX3922).

### **Assessment of Effect**

#### *Architecture*

Based on current design, only one architectural historic property, the George Washington

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<sup>1</sup> The project is administered as a Public-Private Partnership (P-3) between VDOT and a P-3 concessionaire. The concessionaire will be responsible for constructing the project and procuring a design-builder. VDOT shall ensure that the Section 106 commitments identified in this letter are carried out by the concessionaire through VDOT's review and concurrence responsibilities in its partnership with the concessionaire.

Memorial Parkway (GWMP) (VDHR No. 029-0228), falls within the project APE. The Georgetown Pike (VDHR No. 029-0466) is in the vicinity of the APE; however the 0.53 mile section at the I-495 Interchange does not contribute to and is not included within the NRHP listed portion of the Georgetown Pike. The Tysons Corner Mall (VDHR No. 029-6464) does fall within the APE for indirect effects. However, the proposed project will not directly impact Tysons Corner Mall, nor will it alter the existing feeling and setting of the resource. Therefore, VDOT maintains that the proposed project will have no effect on the Tysons Corner Mall.

With regard to the GWMP, VDOT's assessment of effect has been informed by two documents: the NRHP nomination for the GWMP prepared by the NPS in 1995 and the Cultural Landscape Inventory (CLI) for the North Parkway published by the NPS in 2009. The NRHP nomination specifically excludes the I-495/GWMP interchange from the defined historic property, and most project elements are located within that excluded interchange. In addition, the CLI identifies certain aspects of the North Parkway that are important landscape elements including views of the Potomac Palisades, stone walls, the tree canopy and the configuration of the Parkway itself. Of those elements, only the tree canopy and the Parkway's configuration are within the project's APE. Alteration of the canopy will occur only as a result of the four gateway options in an area that had minimal forest cover during the GWMP's period of significance defined in the NRHP nomination (see Attachment: *George Washington Memorial Parkway Visualization Booklet*, page 8).<sup>2</sup> Further, the overall configuration of the Parkway itself will be altered only by extending the existing merge taper for a distance of approximately 1150 feet within the NRHP boundaries of the GWMP. It is VDOT's opinion that neither of these alterations to character-defining features of the GWMP rise to the level of diminishing those features.

#### *Archaeology*

Although the Dead Run Ridges Archaeological District (44FX3922) is located within the APE for archaeological resources, the APE does not extend within any of the archaeological resources that contribute to the NRHP eligibility of the district, and no other archaeological sites eligible for or listed on the NRHP are located within the APE for archaeological resources (Figure 3). Three NRHP-eligible archaeological sites (44FX0374, 44FX0379, and 44FX0389) and one unevaluated archaeological site (44FX2430), however, are located immediately adjacent to the Project LOD.

#### *Proposed Design*

The VDOT design team worked closely with the NPS and consulting parties in order to develop a project that considers the setting and feeling of the GWMP. The goal behind the design is to minimize the visual and physical impact to the GWMP, while incorporating elements of design that creates a gateway entrance to the GWMP off I-495. Early in the Section 106 process, the NPS stated that a design clearly identifying the GWMP to drivers exiting I-495 was preferred. To meet this request, the design consultant presented a *George Washington Memorial Parkway Visualization Booklet* (the Booklet) at the February 6, 2020 consulting parties meeting (a copy of the Booklet is included with this correspondence). The Booklet presents a design concept that addresses the NPS's desire for a clear gateway to the GWMP, proposed directional signage to I-

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<sup>2</sup> The *Visualization Booklet*, dated February 6, 2020, is an Attachment to this letter by reference. It was distributed to all the consulting parties and is not physically attached. If additional copies are needed, please contact VDOT.

495 from the GWMP, and the merging of the express lanes and general purpose lanes from I-495 from the south onto the GWMP. VDOT maintains that the design options presented in the Booklet minimize the effect of the I-495 NEXT project to the GWMP. While the proposed project may alter the setting and feeling of the GWMP, the project does not diminish any aspects of integrity that contribute to the significance of the resource.

The Booklet outlines four gateway options for traffic traveling from the express lanes and general purpose lanes from I-495 onto the GWMP. Three of the options involve the construction of a stone-faced retaining wall, while one option proposes an alteration by laying back the slope to the south of the GWMP. The VDOT presented the VDHR an opportunity to review and comment on the four design options presented in the Booklet. In an April 2020 letter the VDHR expressed their preference for Option 1, the option that proposes to lay back the slope to the south of the GWMP verses the other three options. The VDHR maintains that Option 1 is the preferred option because it will not result in the introduction of new features on the landscape. However, the VDHR withheld their decision on a final effect determination for the project in order to give the NPS an opportunity to review and comment on the four options presented in the Booklet.

In April 2020, the VDOT received a letter from the NPS stating that the agency agreed with VDOT's no adverse effect determination for the I-495 NEXT project provided that VDOT used Option 1 for the project. In an October 2020 letter, the NPS provided additional guidance and conditions to support the no adverse effect determination. In the October 2020 letter, the NPS requested that the VDOT minimize loss of forest and mitigate for any loss of vegetation in the vicinity where I-495 connects with the GWMP. Further, the NPS recommends that sound wall treatments on VDOT property complement existing walls and architecture along the GWMP.

In an attempt to support the no adverse effect determination for the I-495 NEXT project, VDOT shall commit to the following conditions. The VDOT shall utilize Option 1, as described in the Booklet, at the entrance to the GWMP off I-495. The landscaping completed for the project shall meet NPS standards and specifications, apply the minimization and mitigations efforts requested by the NPS, as well as incorporate the results of the tree survey already completed for this project. VDOT shall consult with the NPS and consulting parties to ensure that the NPS-selected gateway design concept will avoid any adverse effects to the GWMP. VDOT shall develop a major milestones design review schedule in consultation with the Virginia SHPO, the NPS and other consulting parties. The major milestones design review schedule shall include at least two interim submissions for review.



**Determination of Effect**

The implementing regulations of Section 106 of the NHPA define an effect as an “alteration to the characteristics of a historic property qualifying it for inclusion in or eligible for the National Register” [36CFR800.16 (i)]. The effect is adverse only when the alteration of a qualifying characteristic occurs in a “manner that would diminish the integrity of the property’s location, design, setting, materials, workmanship, feeling, or association” [36CFR800.5 (a)]. VDOT Cultural Resources staff have reviewed the plans for this project, which reflect VDOT’s concerted efforts to minimize and avoid impacts to historic properties, as documented in part by the Booklet, and have determined that the project as proposed will alter but not diminish the integrity of historic properties within the project’s APE. As such, VDOT has determined that the revised design of the I-495 NEXT Project will have No Adverse Effect on historic properties in accordance with 36 CFR 800.5(b), provided that conditions are imposed and implemented to avoid adverse effects on the GWMP (VDHR No.: 029-0228) and the Dead Run Ridges Archaeological District (44FX3922), as well as its contributing resources Archaeological Sites 44FX0374, 44FX0379, 44FX0389, and 44FX2430 (see discussion above and concurrence page).

VDOT looks forward to receiving any comments you or other consulting parties may have about these findings. We ask that comments be provided within 30 days of receipt of this letter. If the Virginia SHPO concurs with VDOT’s findings, we invite you to complete the signature block below and return it to my attention. Please contact Sarah at (804) 371-6710, [Sarah.Clarke@VDOT.virginia.gov](mailto:Sarah.Clarke@VDOT.virginia.gov), or Will at (804) 786-2852, [William.Moore@VDOT.virginia.gov](mailto:William.Moore@VDOT.virginia.gov), if you have questions about this project.

Sincerely,



Sarah M. Clarke  
Environmental Program Planner  
Cultural Resources



William H. Moore  
Environmental Program Planner  
Cultural Resources

- c. Fairfax County History Commission
  - Tammy Stidham, National Park Service, National Capital Region
  - Charles Cuvelier, Superintendent, George Washington Memorial Parkway
  - Maureen Joseph, George Washington Memorial Parkway
  - Steve Archer, Maryland State Highway

\*\*\*\*\*

The Virginia Department of Historic Resources (VDHR) concurs with the Virginia Department of Transportation (VDOT) that:

- No further cultural resources survey is warranted at this time. VDOT shall monitor design efforts and consult with the Virginia SHPO and other consulting parties should additional survey efforts be necessary.
- The project as proposed will have No Adverse Effect on historic properties, provided the following conditions to avoid adverse effects are implemented:
  - VDOT shall include design constraints in the Request for Proposals requiring the design-builder to remain within the current LOD where possible in designing and constructing project improvements in the vicinity of Archaeological Sites 44FX0374, 44FX0379, 44FX0389, and 44FX2430. VDOT shall ensure that the Concessionaire includes a Special Provision in the design-build contract with the design-builder, requiring that safety fencing is erected along the LOD to ensure avoidance of any ground disturbance to Sites 44FX0374, 44FX0379, 44FX0389, or 44FX2430 during construction of the project, or by construction vehicles entering and leaving the project corridor.
  - VDOT shall implement Option 1 as presented in the *George Washington Memorial Parkway Visualization Booklet* dated February 6, 2020 and selected by the VA SHPO and the NPS as the preferred option for the I-495 NEXT project.
  - VDOT shall construct any infrastructure, such as retaining walls on NPS lands (if required and approved by NPS), associated with the NPS-selected gateway Option 1 in accordance with NPS specifications.
  - VDOT shall install any necessary plantings on NPS lands associated with the NPS-selected gateway option in accordance with NPS specifications.
  - VDOT shall minimize the amount of forest removal and mitigate for forest removal deemed necessary to implement Option 1.
  - VDOT shall coordinate the design and location of the signage to be installed within the George Washington Memorial Parkway for the I-495 NEXT project with the NPS.
  - VDOT shall consult with the GWMP and the Virginia SHPO at major milestones in project design to ensure the design remains consistent with these conditions to avoid adverse effects on the GWMP.

For VDOT Project No. 0495-029-419, P1O1; UPC: 113414; VDHR File No.: 2018-0473.

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Julie V. Langan  
Director, Virginia Department of Historic Resources  
Virginia State Historic Preservation Officer

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Date

**Appendix E: Local Officials and Local Organizations  
Correspondence Following EA Distribution and Public Hearing**



## Correspondence from Local Officials and Organizations Following Distribution of the EA

Agency/Organization	Date Received	Subject
Adventist HealthCare Letter	10/13/2020	Letter of Support
Alexandria Chamber of Commerce	10/12/2020	Letter of Support
Apartment and Office Building Association of Metropolitan Washington	9/30/2020	Letter of Support
Arlington Chamber of Commerce	10/14/2020	Letter of Support
Capital One	9/22/2020	Letter of Support
Fairfax Alliance for Better Bicycling	12/4/2020	Project Comments
Fairfax County Board of Supervisors	10/8/2020	Public Engagement Period Extension Request
Fairfax County Board of Supervisors	12/3/2020	EA Comments
Fairfax County Board of Supervisors	12/3/2020	Design Comments – Letter to Secretary
Fairfax County Board of Supervisors	2/23/2021	Project Comments
Fairfax County Board of Supervisors	4/13/2021	Endorsement of I-495 NEXT Project
Great Falls Citizens Association	5/3/2020	Project Comments
Great Falls Citizens Association	11/30/2020	Additional Project Comments
Greater Reston Chamber of Commerce	4/6/2020	Letter of Support
Greater Springfield Chamber of Commerce	10/12/2020	Letter of Support
Greater Washington Partnership	11/9/2020	Project Comments
Holy Trinity Church	10/2/2020	Property Impacts
Honorable Terence R. McAuliffe	10/5/2020	Letter to Secretary
McLean Citizens Association	9/2/2020	EA Comments
McLean Citizens Association	9/10/2020	Letter to Secretary
Mount Vernon Chamber of Commerce	10/12/2020	Letter of Support
NAIOP Northern Virginia Chapter	3/18/2020	Letter of Support
National Parks Conservation Association	11/24/2020	Project Comments
Northern Virginia Building Industry Association	9/28/2020	Letter of Support
Northern Virginia Chamber of Commerce	3/11/2020	Letter of Support
Northern Virginia Citizens Association	12/4/2020	Project Comments
Northern Virginia Transportation Alliance	10/5/2020	Letter of Support
Prince William Chamber of Commerce	3/11/2020	Letter of Support
Saigon Citizens Association	4/15/2020	Project Comments
Senator Howell	3/11/2020	Letter of Support
Senator Marsden	10/6/2020	Letter to Secretary
Senator Saslaw	10/5/2020	Letter of Support
Sierra Club Great Falls Group	4/17/2020	Project Comments
Sierra Club Great Falls Group	8/27/2020 and 12/3/2020	Comments about Bi-State Accord
Sierra Club Great Falls Group	9/30/2020	Project Comments

<b>Agency/Organization</b>	<b>Date Received</b>	<b>Subject</b>
Southern Environmental Law Center	5/8/2020	Project and EA Comments
Timberly South Neighborhood	10/5/2020	Project Comments
Tysons Partnership	12/4/2020	Project Comments
Tysons Regional Chamber of Commerce	11/17/2020	Letter of Support
Virginia Chamber of Commerce	10/29/2020	Letter to Secretary
Virginia Transportation Construction Alliance	10/8/2020	Letter of Support
Virginians for Better Transportation	10/15/2020	Letter of Support
Virginia Transit Association	9/30/2020	Letter of Support
Washington Airports Task Force	10/26/2020	Letter of Support



820 West Diamond Avenue, Suite 600  
Gaithersburg, MD 20878  
[www.AdventistHealthCare.com](http://www.AdventistHealthCare.com)

October 12, 2020

VDOT Central Office  
1401 E. Broad St.  
Richmond, VA 23219

RE: Support for the 495 Express Lanes Northern Extension

To Whom It May Concern:

On behalf of Adventist HealthCare, I am writing to express my support for the proposed 495 Express Lanes Northern Extension Project. This project will improve travel along 495 between the Dulles Road interchange and the George Washington Parkway.

Adventist HealthCare is largest healthcare provider and private employer in Montgomery County, Maryland. We have a vested interest the continued development and prosperity of the region. This project will improve the commuting experience for many Adventist HealthCare employees and other area residents. Investments in transportation infrastructure are critical to remaining competitive and developing a robust and vibrant workforce.

Adventist HealthCare supports the 495 Express Lanes Northern Expansion project and encourages its swift adoption and implementation.

Sincerely,

A handwritten signature in black ink that reads 'Terry Forde'.

Terry Forde  
President and CEO  
Adventist HealthCare





333 N. Fairfax Street  
Suite 302  
Alexandria, VA 22314  
703.549.1000

October 12, 2020

To Whom it May Concern,

We are writing to you today on behalf of the Alexandria Chamber of Commerce in strong support of the 495 NEXT project that will extend the Express Lanes north to the George Washington Memorial Parkway. The Alexandria Chamber of Commerce represents more than 700 member businesses ranging from one of a kind small businesses to leading global organizations.

Our mission is to ensure a climate that grows and strengthens business in Alexandria. The 495 NEXT project will support that critical mission, helping create tens of thousands of jobs for the region and boosting economic development by an estimated \$880 million dollars. In addition, the congestion relief that will come along with this project will allow greater access to many of our businesses and move additional goods throughout the region. It also removes one more barrier from people trying to reach the City of Alexandria from Northern Fairfax.

This project is good for all who travel the I-495 corridor. The project will reduce the number of accidents in this area by 20%, protecting both people and property. This reduction in accidents will also reduce the traffic delays that come along with them.

The Express Lanes are a proven way to move more people through a corridor with less vehicles. The HOV lanes that were created through the first 495 Express Lanes project have been a tremendous success, growing more than 250% since their first year in operation. Bus trips have also grown exponentially in this corridor since the lanes inception. These benefits provide equity for everyone in the region, giving all of us an opportunity to skip the congestion at no extra cost. Moving more people in fewer vehicles improves our environment and air quality, which in turn provides a better quality of life for everyone.

The Alexandria Chamber of Commerce seeks to leverage the voices of our business community to advance solutions that will enhance the business climate in the city and region. We are pleased to lend our voice to this critical project and recommend that it move forward quickly.

Thank you,

Dave Millard  
2020 Chair of the Board  
Alexandria Chamber of Commerce

Joe Haggerty  
President & CEO  
Alexandria Chamber of Commerce





September 30, 2020

Virginia Department of Transportation  
4975 Alliance Drive  
Fairfax, Virginia 22030

To Whom It May Concern,

On behalf of The Apartment and Office Building Association of Metropolitan Washington (AOBA), I am writing to support the I-495 NEXT project. The 495 and 95 Express Lanes have been successful in reducing commute times for thousands of Northern Virginia residents along the I-95 corridor while growing the economy of the Commonwealth at zero cost to taxpayers.

As you know, AOBA is a non-profit organization representing owners and managers of 185,000 apartment units and approximately 145 million square feet of office space in the District, Maryland and Virginia. As such, our member companies consider themselves part of the community and maintain a vested stake in the long-term economic sustainability and well-being of the region.

The Interstate 495 NEXT project is vital for the Northern Virginia region, as it provides an option for reliable, faster travel by reducing commuting times in half during rush hour for those who choose to use the Express Lanes. It allows transit and carpoolers to bypass congestion with a faster toll free trip and reduces cut-through traffic that now plagues neighborhoods along I-495.

Another critical reason to support the 495 NEXT project is that it will spur economic development in Virginia with the estimated creation of 6,300 jobs and \$880 million generated in economic activity. This is an important project to maintaining the region's overall competitiveness. Additionally, the project will provide further enhanced transportation choices such as HOV service and transit along the corridor, which is valuable as we look to lower gas emissions and reduce car usage in the region.

The Apartment and Office Building Association of Metropolitan Washington supports the I-495 NEXT project to move forward without further postponement.

Sincerely,

*Bismah ahmed*

Bismah Ahmed, Director of Government Affairs, Virginia  
Apartment and Office Building Association of Metropolitan Washington (AOBA)



1050 17th Street, NW Suite 300 Washington, DC 20036  
p: 202.296.3390 f: 202.296.3399  
[www.aoba-metro.org](http://www.aoba-metro.org)





October 14, 2020

VDOT Northern Virginia District Office  
Attn: Abi Lerner, P.E.  
4975 Alliance Drive  
Fairfax, VA 22030

Dear Mr. Lerner,

The Arlington Chamber of Commerce supports the 495 NEXT project to extend the 495 Express Lanes from their current terminus north to the George Washington Memorial Parkway. The 495 NEXT project will improve regional connectivity in Northern Virginia and prepare our region for improved connectivity with Maryland, supporting regional economic development. As a privately funded project, 495 NEXT will add to our local economy and transportation network without diverting public funds from other infrastructure and community needs.

Expanding the 495 Express Lanes will improve travel for all modes on and connecting to the Capital Beltway. Transit and carpoolers will be able to use the facility to bypass congestion across the entire western portion of the Beltway in Virginia. Express Lane users will gain new connections to the Dulles Toll Road and George Washington Memorial Parkway, two important regional arterials, promoting connectivity across Northern Virginia. Moreover, the 495 NEXT project prepares to extend the Express Lanes across a rebuilt American Legion Bridge into Maryland through the Capital Beltway Accord project.

The project will support economic development in Northern Virginia. Directly, the 495 NEXT project will constitute a \$500 million private investment. The project also anticipates creating more than 6,000 jobs and more than \$800 million of economic activity in our region, at a time when we are all working to mitigate the economic consequences of the COVID-19 pandemic.

The Arlington Chamber supports the development and maintenance of highway facilities that will promote and enhance commerce, encourage tourism, and facilitate the movement of Virginians to work, school, recreation, and other activities. The 495 NEXT project is an opportunity for VDOT and the private sector to work collaboratively to deliver transportation infrastructure that meets local needs, and to continue to embrace innovation.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink that reads "Kate Bates". The signature is written in a cursive, flowing style.

Kate Bates  
President & CEO



Capital One Services  
1680 Capital One Drive  
McLean, VA 22102

September 23, 2020

By Email to:

[495NorthernExtension@VDOT.virginia.gov](mailto:495NorthernExtension@VDOT.virginia.gov)

Dear Project Evaluation Team:

Several thousand Capital One associates and their families are frequent users of the 495 Express Lanes. The 495 Express Lanes are a tremendous success for commuters on the Capital Beltway. They improve travel times for drivers in the Express lanes and the general-purpose lanes. Capital One strongly supports the proposed 495 Northern Extension Project (495 NEXT) to expand the 495 Express Lanes to the George Washington Memorial Parkway to provide similar benefits to those travelling north of Tysons on 495.

The existing 495 Express Lanes benefit not only our associates who drive alone to work, but also those opting to travel by carpool or bus. This helps reduce the number of associates taking single-occupancy vehicle trips to work, improves the quality of life for commuters, and benefits the environment through reduced carbon emissions.

The economic strength of the Northern Virginia region has already improved with the congestion relief provided by the 495 Express Lanes, and will be further enhanced by 495 NEXT. Project NEXT, and its connection to the proposed American Legion Bridge improvements, represent major steps forward in the strengthening of Northern Virginia's system of transportation.

Project NEXT has our strong support and we look forward to its construction. Thank you for your consideration of this important regional initiative.

Sincerely,

Barry L. Mark  
Vice President  
Design & Construction, WPS  
Capital One

FABB Supports the 495 Parallel Trail

1 message

Sonya Breehey <sonya@fabb-bikes.org>

Fri, Dec 4, 2020 at 11:16 PM

To: Virginia Department of Transportation <495northernextension@vdot.virginia.gov>

I am commenting on behalf of the Fairfax Alliance for Better Bicycling (FABB) on the Virginia Department of Transportation's (VDOT's) 495 Express Lanes Northern Extension Project. FABB is not taking a position on the HOT lanes, but writes to offer support for the planned parallel trail included in the proposed project. We appreciate that VDOT included the parallel shared-use trail in the plan from the outset.

We recognize that 495 NEXT has become a controversial project because of questions about the likely benefits of extending the High Occupancy Toll lanes, uncertainty of Maryland's plans, the lack of transit funding, and the significant impacts on the environment.

As the Fairfax County Department of Transportation (FCDOT) pointed out in a recent presentation to the Board of Supervisors, the planned trail alone has value because it will promote active transportation connections in and around Tysons. If built, the trail will help provide much needed connectivity between Tysons, McLean and across the American Legion Bridge when it is improved.

Regardless of the final decision on the projected express lanes, FABB urges VDOT and Fairfax County to construct this parallel trail and needed connections into nearby communities, transit, and activity centers.

To make a safe, comfortable, and well used trail, VDOT should:

- Place the bicycle and pedestrian trail behind the noise wall along the three-mile corridor.
- Provide improved bike facilities on Tyco Road, Jones Branch Drive, and Spring Hill Road on south of International Drive.
- Improve access from Lewinsville Road along Spring Hill Road underneath the Dulles Toll Road and into Tysons. Currently, there is a narrow and rough paved path and sidewalk from Lewinsville to the Toll Road and then up to the intersection with Jones Branch Road that needs to be widened and improved.

1

In the sections of the bicycle and pedestrian adjacent to I-495, the trail is being proposed to be constructed behind the sound wall.

2

These suggestions are outside the project area. As a separate initiative, Fairfax County in coordination with VDOT has been enhancing the pedestrian and bicycling facilities within Tysons. These bicycle and pedestrian enhancements have been implemented through VDOT restriping projects, development contributions and Fairfax County programs. VDOT will continue to coordinate with Fairfax County on the implementation of future bicycle and pedestrian enhancements.

3

These suggestions are outside the project area. As a separate initiative, Fairfax County in coordination with VDOT has been enhancing the pedestrian and bicycling facilities within Tysons. These bicycle and pedestrian enhancements have been implemented through VDOT restriping projects, development contributions and Fairfax County programs. VDOT will continue to coordinate with Fairfax County on the implementation of future bicycle and pedestrian enhancements.

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- Upgrade traffic signals in these areas should be upgraded to account for pedestrians and cyclists.
- Ensure that adequate wayfinding signage is included to get riders and pedestrians from the I-495 shared use path along Lewinsville Road to Tysons and then to Reston and Gallows Road.

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The new traffic signals that would be installed as a result of the project construction would incorporate pedestrian crossings, handicap ramps, and state of the art pedestrian signals. The signal timings would be set up to take into account the bicycle and pedestrian movements through the intersections.

5

The signage plan for 495 NEXT would be coordinated with FCDOT to support the county's bicycle network.

Thank you for the opportunity to provide feedback on this project.

Sincerely,

Sonya Breehey  
President, Fairfax Alliance for Better Bicycling

Sent from [Outlook](#)



JEFFREY C. MCKAY  
CHAIRMAN

COMMONWEALTH OF VIRGINIA  
**County of Fairfax**  
BOARD OF SUPERVISORS

SUITE 530  
12000 GOVERNMENT CENTER PKWY  
FAIRFAX, VIRGINIA 22035-0071

TELEPHONE: 703-324-2321  
FAX: 703-324-3955  
TTY: 711

chairman@fairfaxcounty.gov

October 8, 2020

Ms. Helen Cuervo, Administrator  
Northern Virginia District  
Virginia Department of Transportation  
4975 Alliance Drive  
Fairfax, Virginia 22030

Reference: Additional Public Input on the I-495 Northern Extension Project (I-495 NEXT)

Dear Ms. Cuervo:

On behalf of the Fairfax County Board of Supervisors, I am writing to inform you of the Board's concern regarding opportunities for public input and feedback on the I-495 NEXT project.

The I-495 NEXT project will have lasting effects on accessibility for surrounding communities in Fairfax County, and it is essential that citizens are well informed of the project's scope and resulting impacts. While the materials related to the I-495 NEXT project have been available since earlier this year, the public has had limited opportunities to engage with the Virginia Department of Transportation (VDOT) on the effects the project will have on the surrounding community.

Recognizing that COVID-19 has made public meetings difficult, there remain ample means to provide additional information to the public and collect more input prior to making any decisions about this major project. The Board requests that VDOT allow additional time and opportunity for the public to learn about the project and provide feedback prior to finalizing the environmental document and design plans and proceeding with execution of the final contract with the concessionaire.

1

Thank you for your consideration and continuing efforts on the I-495 NEXT project. If you have any questions, please call Martha E. Coello at (703) 877-5682 or me at (703) 324-2321.

Sincerely,

Jeffrey C. McKay  
Chairman

- cc: Members, Board of Supervisors  
Members, Commonwealth Transportation Board  
The Honorable Barbara A. Favola, Senate of Virginia  
The Honorable Janet D. Howell, Senate of Virginia  
The Honorable Mark L. Keam, Virginia House of Delegates  
The Honorable Kathleen J. Murphy, Virginia House of Delegates

1 In order to accommodate this request and ensure adequate time was given to comment and review on the I-495 Express Lanes Northern Extension project, VDOT agreed to reschedule the comment period to Dec 4, 2020.

The Honorable Richard C. Sullivan, Jr., Virginia House of Delegates  
The Honorable Mary H. Hynes, Northern Virginia District Board Member, Commonwealth Transportation Board (CTB)  
The Honorable E. Scott Kasprovicz, At-Large Urban Board Member, CTB  
The Honorable Shannon Valentine, Secretary of Transportation, Commonwealth of Virginia  
The Honorable Nick Donohue, Deputy Secretary of Transportation, Commonwealth of Virginia  
Stephen C. Brich, Commissioner, Virginia Department of Transportation  
Robert H. Cary, P.E., L.S., Chief Deputy Commissioner, Virginia Department of Transportation  
Bryan J. Hill, County Executive  
Rachel Flynn, Deputy County Executive  
Tom Biesiadny, Director, Fairfax County Department of Transportation (FCDOT)  
Martha E. Coello, Division Chief, FCDOT



JEFFREY C. MCKAY  
CHAIRMAN

COMMONWEALTH OF VIRGINIA  
**COUNTY OF FAIRFAX**  
BOARD OF SUPERVISORS  
FAIRFAX, VIRGINIA 22035

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TELEPHONE 703-324-2321  
FAX 703-324-3955

chairman@fairfaxcounty.gov

December 3, 2020

The Honorable Shannon Valentine  
Secretary of Transportation  
Commonwealth of Virginia  
Patrick Henry Building, Third Floor  
1111 East Broad Street  
Richmond, Virginia 23219

Reference: Fairfax County Comments on I-495 Express Lanes Northern Extension Project Draft Design Plans

Dear Secretary Valentine:

On December 1, 2020, the Fairfax County Board of Supervisors approved comments regarding the draft design for I-495 Express Lanes Northern Extension (I-495 NEXT) Project. I-495 NEXT project is important to Fairfax County. The Board continues to support the Commonwealth's efforts to reduce congestion and provide additional travel choices in the Capital Beltway Corridor and to move the most people as efficiently as possible in this region. Furthermore, the project's proximity to Tysons and McLean also signifies that improvements in the Corridor will have lasting effects on accessibility and increased economic opportunity for surrounding communities in Fairfax County. As VDOT's own studies demonstrate, the project provides significant benefits only if Maryland completes their system of managed lanes, particularly increasing the capacity of the American Legion Bridge. In the interim, the project will cause inequitable and unacceptable delays to non-Express Lane traffic. Construction of the project will also cause massive disruption to neighborhoods in and around McLean and Tysons as well as permanent damage to parks, stormwater, streams, and private property with no equivalent benefits without Maryland's managed lanes. Therefore, it is imperative that VDOT only consider final action on the I-495 NEXT project once Maryland has successfully executed a comprehensive agreement with a developer to complete their system of managed lanes.

Considering the implications of the I-495 NEXT project, it is essential that citizens are well informed of its scope and resulting impacts. As previously communicated, the Board requests that VDOT continue to allow time for the public to provide feedback on the project prior to executing a final contract with the concessionaire.

Fairfax County has been engaged with this project from its inception and appreciates VDOT's efforts to address many of the project issues. The Board looks forward to continued and improved coordination as project design progresses. As part of those efforts, the Board offers the following comments regarding the I-495 NEXT draft design plans released in February 2020. These comments should not be construed as a County endorsement of the I-495 NEXT project.

- 2025 Traffic Operations Prior to Maryland Managed Lanes

- The Board acknowledges VDOT's effort to analyze the 2025 traffic conditions in the event managed lanes north of the American Legion Memorial Bridge (ALMB) in Maryland are not complete. Aside from the Board's concerns regarding travel time and level of service degradation at arterial intersections in this scenario, it will be critical to coordinate design efforts to ensure an adequate transition prior to the implementation of Maryland's managed lane system.

*Comment continued on next page*

1

1 VDOT continues to work to identify measures that could be employed to improve traffic operations both during construction, and in the interim period before Maryland implements their program. Although the traffic study for 2025 horizon year identified some potential degradation to travel times during NB peak period, it also showed that cut-through traffic would be reduced, and that overall, more people would be moved and delays at some key intersections would be improved. VDOT will continue to coordinate with Fairfax County on traffic operations issues and minimization of traffic impacts as the project development process progresses.



Based on the current schedule, I-495 NEXT is expected to be completed prior to Maryland's system of managed lanes. It is critical that VDOT address the temporary impacts of opening prior to the opening of Maryland's managed lanes to ensure a safe transition to the existing ALMB configuration in the interim.

- As construction plans are developed, construction phases for both projects should seek to minimize reconstruction at the tie-in segments and reduce unnecessary disturbance to surrounding communities between construction phases.
- Since the project will be more effective once Maryland improves the American Legion Bridge, the Board recommends that VDOT continue to closely coordinate with Maryland on the two projects to ensure that these transportation improvements are well integrated and beneficial to the region. Recognizing that Maryland has solicited proposals from multiple private partners for their project, including improvements to the American Legion Bridge as a first phase, the Board strongly urges that VDOT make every effort to minimize the time between the opening of I-495 NEXT and the Maryland project.

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• Stormwater

- The Board recognizes the importance of transportation projects to our community. However, it is also critical to minimize the negative water quality impacts that the additional impervious area has on County watersheds. This is critically important in the McLean area adjacent to the I-495 NEXT project, which has experienced significant flooding during recent storms. Based on the current plan, VDOT anticipates about 3,000 linear feet of stream impacts, mostly located along Scotts Run between Lewinsville Road and Old Dominion Drive. Increased imperviousness from the I-495 NEXT project has significant potential to exacerbate already prevalent stream degradation and flooding issues, particularly at Scotts Run.

For over a year, County staff has worked with VDOT to coordinate the efforts on stormwater management design for this project. As has been discussed in those meetings and via the attached letters to Department of Environmental Quality (Attachment 2) and to Office of the Secretary of Natural Resources (Attachment 3), VDOT should pursue on-site restoration of Scotts Run within the project limits and state transportation projects should meet local standards for stormwater management when the local standards are more stringent to the extent possible. Most recent discussions with VDOT indicate the potential to partner with Fairfax County on stream restoration for Scotts Run. Though these discussions are ongoing, such a partnership would be in addition to the project's state stormwater requirements and help address on-site mitigation.

Along with comments in Attachment 1, the Board requests VDOT consider these requests below prior to advancing the I-495 NEXT project:

- Stormwater Management (SWM) Requirements –The Board requests that this project meet the current County SWM requirements rather than the state grandfathered SWM conditions. As stated in the letter to VDOT on July 17, 2019, and presented in Attachment 2, Fairfax County's criteria is more stringent than VSMP Parts II B and II C of VSMP Regulations, and the Board requests that this project meet these SWM requirements. If meeting our local stormwater management requirements is not attainable, VDOT should implement requirements to the maximum extent practicable and provide documentation demonstrating that the technical requirements are not fully feasible.

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**2** VDOT and MDOT have been coordinating over the last several months regarding design and construction at the George Washington Memorial Parkway Interchange (or interface between I-495 NEXT and the Bi-State projects) to make sure that design is coordinated, taking into account proposed construction by Maryland, with the mutual goal of minimizing construction activities and impacts. On January 27, 2021, Maryland announced their Preferred Alternative, which includes 2 Managed Lanes in each direction on I-495, a pedestrian facility across the American Legion Bridge, and allows HOV-3 vehicles to use their managed lanes for free. And on February 19, 2021, Maryland announced the selection of their private partner.

**3** VDOT continues to work closely with Maryland to align the design of Project NEXT with the selected alternative that results from Maryland's environmental process. It is a focus of Virginia to not only provide a seamless connection but to also focus on efficient construction to minimize disruption to the traveling public.

**4** VDOT presented SWM options to VDEQ to provide a holistic view of impacts to the surrounding properties if the project were to meet County requirements. VDEQ agreed with VDOT's assessment that the impact to residences and loss of natural habitat were too great to follow more stringent regulations. This documentation has been shared with Fairfax County and the current SWM approach for Project NEXT satisfies meeting the requirements to the maximum extent practicable with the application of both onsite SWM facilities and nutrient credits. This approach was developed through coordination between VDEQ, VDOT and Fairfax County, with Fairfax County staff concurrence for the overall project approach. Using the proposed SWM approach, the conditions would be better with the project than they are today, or would be in the future under the No-Build alternative.



- **Water Quantity Control** – The majority of runoff from the new lanes will be piped directly to Scotts Run stream or the Potomac River with no detention, worsening downstream flooding and erosion along Scotts Run. Road flooding impacts both Fairfax County and VDOT infrastructure. The Board is also concerned about tree loss due to stream erosion downstream of I-495. The Board acknowledges that the provision of underground detention may present difficulties with relation to future maintenance and safety. However, the Board requests VDOT pursue underground detention within the right-of-way to the extent feasible to prevent negative impacts to Scotts Run and downstream areas.
- **Stream and Wetland Impacts** – Based on the current plan, the project will generate up to 3,000 linear feet of stream impacts and affect 19.8 acres of impacted wetlands. County staff has requested additional consideration for permittee-responsible mitigation along Scotts Run, particularly between Lewinsville Road and Old Dominion Drive. This stream section is mostly within VDOT right-of-way and directly adjacent to the project limits. In previous discussions, VDOT agreed to explore on-site stream mitigation. Discussions with VDOT on this stream restoration are ongoing.
- **Water Quality** – VDOT’s interpretation of routine maintenance exempts the project’s existing impervious area from the state SWM requirements, so the existing impervious surface will remain largely untreated. Under county stormwater standards, the existing impervious area would also be treated. Additionally, the project will not meet its minimum on-site water quality requirements and will purchase 80 percent of its required nutrient reduction offsite outside of Fairfax County. The Board requests VDOT apply enhanced outfall stabilization practices to meet the project’s water quality requirements on site to the extent possible.
- **Resource Protection Area (RPA) Impacts** – The Environmental Assessment (EA) cites up to 75.5 acres of temporary and permanent impacts to the RPA. Public roads are conditionally exempt from RPA regulation under the Virginia Administrative Code provided that the roadway is designed and constructed in accordance with water quality protection criteria at least as stringent as VDOT requirements. Given that the project will not meet minimum water quality requirements, the Board requests that the project meet the RPA replanting requirements detailed in Fairfax County Code Chapter 118 Chesapeake Bay Preservation Ordinance and Public Facilities Manual Chapter 12 (12-0316.4) in the Scotts Run stream valley section between Lewinsville Road and Old Dominion Drive.

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While the Board recognizes the constraints faced by linear projects like I-495 NEXT, we also believe that transportation projects, particularly of this magnitude, should strive to minimize negative effects on water quality, local streams, and ultimately the Chesapeake Bay. The cumulative impact from the project’s failure to address each of the bullets above will worsen the already degraded condition of the Scotts Run stream valley. Although there are limited options to manage stormwater within the right-of-way, there are other mitigation opportunities within the Scotts Run watershed. Those additional mitigation opportunities are being discussed with VDOT, and the Board is committed to working with VDOT to help meet the project’s stormwater obligations.

- [Bike/Pedestrian Facilities](#)

**5** The proposed drainage features of the 495 project would result in a reduction in water quantity as water leaves the I-495 roadway, as well as an improvement in water quality, when compared with conditions that exist today. VDOT continues to work to identify ways to increase this improvement as we move to final design. Given the high traffic volumes in the corridor, and the limited availability of shoulders, there is no plan to locate any underground features within the roadway pavement or shoulders.

**6** Scotts Run is already significantly degraded in this section due to run-off from upstream and adjacent commercial and residential development within the watershed. Transurban — as the concessionaire for the project — has agreed to provide a monetary contribution to Fairfax County that would cover 50% of the cost for stream restoration for approximately 3,000 linear feet of the existing stream. Impacts would be mitigated in accordance with NEPA, following federal, state, and Virginia DEQ regulations.

**7** The project would include enhancement of a total of five outfalls along the project corridor. One outfall is required per the permit requirement, and the remaining four outfalls have been included as part of the base scope at no cost to the Commonwealth. In addition, the project would provide stream stabilization along Scotts Run within the Limits of Disturbance for the project.

**8** The project as proposed would be designed and constructed to meet water quality protection criteria according to state standards and VDOT’s requirements. Anticipated RPA impacts are detailed in Section 3.2.4 of the *I-495 Natural Resources Technical Report*. As noted in the comment, the I-495 NEXT project would meet the exemption conditions since it meets minimum water quality requirements. The final design would be optimized to limit encroachment into RPAs, but no additional RPA mitigation is required. However, a tree survey would be completed as part of the project that would help inform the revegetation plan, and which would be used to minimize long term impacts to natural areas. In addition, an additional contribution is being made to Fairfax County by Transurban to contribute to the County’s plan to restore the stretch of Scotts Run that parallels the project corridor but is outside the project’s limit of disturbance.

VDOT will coordinate with Fairfax County prior to replanting vegetation in RPAs, although the project is not obligated to adhere to the requirements included in Fairfax County Code Chapter 118 and Public Facilities Manual Chapter 12 (12-0316.4) since the project is meeting minimum water quality requirements.

*Following coordination with FHWA, the following sentence in this response should be revised:*

- *Original text: “However, a tree survey would be completed as part of the project that would help inform the revegetation plan, and which would be used to minimize long term impacts to natural areas.”*
- *Replacement text: “The project includes a revegetation program to replace trees lost due to the construction of the project where feasible following construction. In addition, VDOT has committed to providing a tree survey for impacted areas during the design and construction phase of the project, once more detailed plans are available. The tree survey would be used to further document tree impacts and to inform the revegetation plan.”*



- The bicycle and pedestrian facilities are critical to addressing the varied mobility needs of the region. Fairfax County's Comprehensive Plan recommends a major regional trail along I-495. Such a facility is intended as a link between Maryland and Virginia. The I-495 NEXT project has committed to providing this trail. The provision of this major regional trail is imperative to providing nonmotorized transportation alternatives and reducing single occupancy vehicles in the region. As the Commonwealth coordinates with Maryland on the vehicular improvements to the ALMB, all efforts should be taken to ensure the continuation of this trail into Maryland for pedestrians and bicyclists.
- Tysons is located at the southern end of the I-495 NEXT project. The connection of pedestrian and bicycle facilities as part of this major regional trail and along the secondary streets to Tysons is critical to providing a comprehensive transportation network that meets the needs of this growing community. Currently the major regional trail ends at Lewinsville Road, north of Tysons. VDOT should make all efforts to provide a safe and consistent pedestrian and bike connection from this major regional trail to and within Tysons.
- VDOT should confirm that the design plans will be revised, per previous discussions, to include the pedestrian facility on the north side of Georgetown Pike bridge across I-495 and remove the center striping at the Live Oak Drive overpass to facilitate a more comfortable pedestrian and on-road biking environment.
- The I-495 NEXT project should make all efforts to promote pedestrian and bicycle connections to this major regional trail and along secondary streets. Furthermore, any design elements of the I-495 NEXT project should not preclude the provision of pedestrian and bicycle facilities outlined in the County Trails Plan and Bicycle Master Plan in the future.
- VDOT should continue coordination with the surrounding community on the location of the trail.

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• Right-of-Way

- The Board supports the additional considerations given to minimizing right-of-way impacts to our residences, businesses, parks and natural resources. To better understand the impacts of the project, the Board expects additional details on the nature of any properties or portions of property needed for right-of-way or construction purposes and that limitations on property takings are included in the contract with the concessionaire. Similar to the Transform I-66 project, the I-495 NEXT project should continue to make stringent efforts to further reduce right-of-way impacts to surrounding properties.

• Enhanced Transit

- A clear advantage of the managed lanes is that they support more reliable and more efficient bus service in the corridor. The Board acknowledges the I-495 American Legion Bridge Transit and TDM Study led by Maryland Department of Transportation (MDOT)/ Maryland Transit Administration (MTA) and Virginia Department of Rail and Public Transportation (DRPT), which seeks to find multimodal solutions for the corridor. Prior to the completion of this study, it is imperative that additional community outreach occur to ensure that feedback from the community is considered in any final recommendations. In addition to this effort, Fairfax County has included a new bus route over ALMB in its Transit Network Study. Considering the potential for new transit routes via the Express Lanes, VDOT should incorporate the findings and recommendations of the Transit and TDM Study and County's Transit Network Study prior to final action on I-495 NEXT.

Response to this comment is on the next page

• Elevated Ramps

**9** The Build Alternative includes an approximately 3.1-mile, 10-foot-wide shared use path, consistent with the *Fairfax Countywide Trails Plan Map*. VDOT is coordinating with Maryland on connectivity of the proposed trail between the two states. VDOT plans for the first phase of the trail to be constructed up to Live Oak Drive as part of the I-495 NEXT project, where it can tie in to the Potomac Heritage Trail on the west side of I-495. Maryland has indicated that they are committed to providing for a trail on the American Legion Bridge.

**10** A potential means of routing users from the south end of the proposed shared use path to Tysons could be to use the existing shared use path on the north side of Lewinsville Road, from Timberly Lane to Route 123/Great Falls Street, then the Dolley Madison Boulevard Walkway — recently completed as part of the Tysons Metrorail Station Access Improvement Projects — between Great Falls Street and the McLean Metro Station at Scotts Crossing Road in Tysons.

VDOT coordinated with Fairfax County staff early in the project development process and demonstrated through a preliminary high-level assessment that a direct connection via grade-separated viaduct to Tysons would have constructability issues due to engineering and topography constraints, as well as environmental and right-of-way impacts, and could cost more than \$30M.

**11** The conceptual design plans include pedestrian facilities on the north and south sides of the Georgetown Pike bridge across I-495. VDOT would coordinate with Fairfax County on the specifics of the Live Oak Drive overpass striping during final design. The project would provide a total of six connections from the proposed shared use path to the existing trail network. The VDOT team has worked to evaluate requests for a number of connections, accounting for wetlands, park lands, topography, and right-of-way impacts, which constrained some of the options considered.

**12** VDOT has and will continue to coordinate the alignment and design elements of the path with residents of the surrounding communities, pedestrian and bicycle trail advocacy groups, and Fairfax County staff. The trail would be available for use by local residents and will be part of the regional multimodal network.

**13** As part of the public hearing materials, preliminary design documents provide a listing of properties, along with property-type, that are anticipated to be impacted by the project. The Design-Build contract requires the Contractor to stay within defined project limits and to minimize the project footprint where possible.



- The bicycle and pedestrian facilities are critical to addressing the varied mobility needs of the region. Fairfax County’s Comprehensive Plan recommends a major regional trail along I-495. Such a facility is intended as a link between Maryland and Virginia. The I-495 NEXT project has committed to providing this trail. The provision of this major regional trail is imperative to providing nonmotorized transportation alternatives and reducing single occupancy vehicles in the region. As the Commonwealth coordinates with Maryland on the vehicular improvements to the ALMB, all efforts should be taken to ensure the continuation of this trail into Maryland for pedestrians and bicyclists.
- Tysons is located at the southern end of the I-495 NEXT project. The connection of pedestrian and bicycle facilities as part of this major regional trail and along the secondary streets to Tysons is critical to providing a comprehensive transportation network that meets the needs of this growing community. Currently the major regional trail ends at Lewinsville Road, north of Tysons. VDOT should make all efforts to provide a safe and consistent pedestrian and bike connection from this major regional trail to and within Tysons.
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- The I-495 NEXT project should make all efforts to promote pedestrian and bicycle connections to this major regional trail and along secondary streets. Furthermore, any design elements of the I-495 NEXT project should not preclude the provision of pedestrian and bicycle facilities outlined in the County Trails Plan and Bicycle Master Plan in the future.
- VDOT should continue coordination with the surrounding community on the location of the trail.
- Right-of-Way
  - The Board supports the additional considerations given to minimizing right-of-way impacts to our residences, businesses, parks and natural resources. To better understand the impacts of the project, the Board expects additional details on the nature of any properties or portions of property needed for right-of-way or construction purposes and that limitations on property takings are included in the contract with the concessionaire. Similar to the Transform I-66 project, the I-495 NEXT project should continue to make stringent efforts to further reduce right-of-way impacts to surrounding properties.
- Enhanced Transit
  - A clear advantage of the managed lanes is that they support more reliable and more efficient bus service in the corridor. The Board acknowledges the I-495 American Legion Bridge Transit and TDM Study led by Maryland Department of Transportation (MDOT)/ Maryland Transit Administration (MTA) and Virginia Department of Rail and Public Transportation (DRPT), which seeks to find multimodal solutions for the corridor. Prior to the completion of this study, it is imperative that additional community outreach occur to ensure that feedback from the community is considered in any final recommendations. In addition to this effort, Fairfax County has included a new bus route over ALMB in its Transit Network Study. Considering the potential for new transit routes via the Express Lanes, VDOT should incorporate the findings and recommendations of the Transit and TDM Study and County’s Transit Network Study prior to final action on I-495 NEXT.
- Elevated Ramps

Response to these comments are on the previous page

**14** The Virginia Department of Rail and Public Transportation is conducting the I-495 American Legion Bridge Transit and TDM Study in coordination with the Maryland Department of Transportation's Maryland Transit Administration (MTA). The recommendations resulting from this study are aimed to work in concert with Virginia's proposed northern extension of the I-495 Express Lanes and Maryland's proposed managed lanes program for the American Legion Bridge, I-495, and I-270. Study information is available at <http://drpt.virginia.gov/transit/major-initiatives/i-495american-legion-bridge-transit-and-tdm-study/>.

The Virginia Department of Rail and Public Transportation (DRPT) held a virtual public meeting for the Transit and TDM Study at the Northern Virginia Transportation Authority (NVTA) on November 12, 2020. Additionally, DRPT gave a presentation to the Transportation Committee of the Fairfax County Board of Supervisors on December 8, 2020. The project team held a public meeting to discuss the findings and recommendations of the study on January 12, 2021. DRPT received Fairfax County’s comment letter on the study on February 2, 2021. DRPT will respond to those comments and will update the final draft report for the Transit and TDM Study, which is expected to be completed in winter of 2021.

*[Following coordination with FHWA, the reference to “winter 2021” in the sentence above should be revised to “spring 2021”]*

Because this study is a separate effort, the findings and recommendations from the Transit and TDM Study are not being included in the NEPA document. However, VDOT is reviewing the recommendations of the study to help develop a Transportation Management Plan (TMP) that would help improve traffic operations during construction. Based on the recommendations of the transit and TDM study, the TMP may include the implementation of a new route or new routes between Virginia and Maryland.

As indicated in the November 30, 2020 letter from Secretary Valentine to Chairman McKay, Virginia is committed to providing dedicated, ongoing support for transit services along the I-495 corridor as part of the I-495 NEXT project. This commitment ensures the 495 NEXT project, together with the existing 495 Express Lanes, will provide multimodal solutions to move more people.



- Some flyover and interchange ramps along the project have been designed with high elevations to allow for adequate clearances and connections between travel lanes. Alternative concepts to the high elevation ramps should be evaluated and considered for minimizing noise, visual and right-of-way impacts upon nearby residential communities. This is a special concern regarding the ramp from the northbound I-495 Express Lanes to George Washington Parkway and the interchange at Dulles Toll Road and I-495.
- A separate reassessment of the design and environmental impacts should be completed before construction of any ramps beyond Phase 1 of the Dulles Toll Road and I-495 interchange. The reassessment should also include a significant community engagement effort to ensure the community is well informed of any impacts and has an opportunity to provide input on the design.
- Previous discussions occurred in 2010 regarding the interchange at the Dulles Toll Road and I-495. At that time, the Board requested additional renderings depicting the impact of the ramps on the surrounding community. To date, that information has not been received and should be provided for review. Such information should clearly depict the impact and height of the ramps in a manner readily understood by the public.

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• Park Impacts

- Cultural Resources:
  - Park Authority staff recommends any areas with ground disturbance throughout the project corridor that are not previously surveyed should undergo a Phase I archaeological survey. If sites are found that are potentially significant to the history of Fairfax County, or potentially eligible for inclusion onto the National Register of Historic Places, they should undergo Phase II archaeological testing. If sites are found significant or eligible, avoidance or Phase III data recovery is recommended.
- Natural Resources:
  - All development on Park Authority property must comply with its Policy 201, Natural Resources, and agency-wide Natural Resource Management Plan (NRMP). Of note is Section 7 of the NRMP:

Avoid adverse impacts to natural areas, mitigate unavoidable impacts from construction and maintenance projects and require restoration and rehabilitation of impacted natural resources.

    - i. Minimize impacts to forests, meadows and other natural areas from human use.
    - ii. Protect significant natural communities and species.
    - iii. Require restoration of impacted natural resources when use of parkland causes damage to them.

If impacts cannot be avoided, staff requests a design that minimizes impacts and a mitigation plan for any losses, which should be coordinated with the Park Authority. This mitigation plan will need to clarify the extent of construction that will occur on Park Authority property as well as the impacts to natural resources.
  - Park Authority recommends the rehabilitation for any temporary impacts to natural resources to Park Authority standards and mitigate/compensate for permanent impacts to natural resources on Park Authority managed lands. This requirement shall apply to any natural resource impact (terrestrial or aquatic) that is not regulated under the jurisdiction of any federal or state agency.

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*Response to these comments are on the next page*

**15** VDOT evaluated a number of ramp configuration options at interchanges within the project study area. These options were presented at the May 20, 2019 Public Information Meeting. Throughout the preliminary design, VDOT has made adjustments to the project ramps to reduce impacts to the adjacent communities. During final design, VDOT would work with the Design-Build team to continue to enhance the design to minimize impacts to the adjacent communities. VDOT would continue to work collaboratively with Maryland at the project interface.

**16** VDOT has signed an Agreement with the Federal Highway Administration (Determination of Operational Independence and Non-Concurrent Construction for I-495 Express Lanes Northern Extension Project dated September 11, 2020) that stipulates that updated studies will be conducted prior to the implementation of future phases of the project. Furthermore, VDOT is committed to conducting outreach efforts prior to the implementation of future phases of the project. Phase 2 would be constructed after 2030 and no later than 2034, and the final phases associated with the Ultimate Configuration would be constructed after 2040 and no later than 2045.

**17** VDOT has developed visualizations for the ramp modifications at the Dulles Toll Road interchange. VDOT has shared these visualizations with Community Associations and Fairfax County representatives. It should be noted that these ramps are future ramps, anticipated to be in subsequent phases that are in 2030 or later. As such, the concept may be subject to future changes when the proposed ramp configurations are reevaluated prior to final design and construction.

**18** Within the Area of Potential Effect (APE), pedestrian surveys and shovel testing were performed in an effort to identify historic archaeological resources. Based on these survey efforts, four archaeological sites were found adjacent to the Area of Disturbance (AOD) but would not be impacted by the I-495 NEXT Project. The results of the archaeological survey efforts are summarized further in the *I-495 Cultural Resources Survey Report*. The Virginia Department of Historic Resources (VDHR) confirmed on April 7, 2020 that none of the archaeological findings meet eligibility criteria set for in the NRHP and no further work associated with archaeological resources is necessary. This information will be included in the Revised Environmental Assessment.

- Some flyover and interchange ramps along the project have been designed with high elevations to allow for adequate clearances and connections between travel lanes. Alternative concepts to the high elevation ramps should be evaluated and considered for minimizing noise, visual and right-of-way impacts upon nearby residential communities. This is a special concern regarding the ramp from the northbound I-495 Express Lanes to George Washington Parkway and the interchange at Dulles Toll Road and I-495.
- A separate reassessment of the design and environmental impacts should be completed before construction of any ramps beyond Phase 1 of the Dulles Toll Road and I-495 interchange. The reassessment should also include a significant community engagement effort to ensure the community is well informed of any impacts and has an opportunity to provide input on the design.
- Previous discussions occurred in 2010 regarding the interchange at the Dulles Toll Road and I-495. At that time, the Board requested additional renderings depicting the impact of the ramps on the surrounding community. To date, that information has not been received and should be provided for review. Such information should clearly depict the impact and height of the ramps in a manner readily understood by the public.

Response to these comments are on the previous page

- Park Impacts

- Cultural Resources:
  - Park Authority staff recommends any areas with ground disturbance throughout the project corridor that are not previously surveyed should undergo a Phase I archaeological survey. If sites are found that are potentially significant to the history of Fairfax County, or potentially eligible for inclusion onto the National Register of Historic Places, they should undergo Phase II archaeological testing. If sites are found significant or eligible, avoidance or Phase III data recovery is recommended.

- Natural Resources:

- All development on Park Authority property must comply with its Policy 201, Natural Resources, and agency-wide Natural Resource Management Plan (NRMP). Of note is Section 7 of the NRMP:

Avoid adverse impacts to natural areas, mitigate unavoidable impacts from construction and maintenance projects and require restoration and rehabilitation of impacted natural resources.

- i. Minimize impacts to forests, meadows and other natural areas from human use.
- ii. Protect significant natural communities and species.
- iii. Require restoration of impacted natural resources when use of parkland causes damage to them.

If impacts cannot be avoided, staff requests a design that minimizes impacts and a mitigation plan for any losses, which should be coordinated with the Park Authority. This mitigation plan will need to clarify the extent of construction that will occur on Park Authority property as well as the impacts to natural resources.

- Park Authority recommends the rehabilitation for any temporary impacts to natural resources to Park Authority standards and mitigate/compensate for permanent impacts to natural resources on Park Authority managed lands. This requirement shall apply to any natural resource impact (terrestrial or aquatic) that is not regulated under the jurisdiction of any federal or state agency.

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**19** VDOT will meet the requirements of Section 4(f) and Section 6(f) for potential park impacts associated with the project, which are consistent with the criteria of Policy 201 and NRMP Section 7. Scott’s Run Nature Preserve is the only park owned by the Fairfax County Park Authority (FCPA) that is within the LOD, and therefore is anticipated to be impacted. Two other parks —Timberly Park and McLean Hamlet Park—are within the study area, but not within the LOD, as described in Section 3.8.1 of the EA. Based on the preliminary design, approximately 4.11 acres of the Preserve are within the LOD, with approximately 1.10 acres anticipated to be permanent impact and 3.01 acres anticipated to be temporary easements (these updated impact numbers will be in the Revised EA). Since the Preserve is a publicly owned and publicly accessible recreational area, it is protected under Section 4(f). In addition, since the Preserve was developed with money from the Land and Water Conservation Fund (LWCF), it is also protected under Section 6(f). VDOT and FHWA have coordinated FCPA during the preliminary planning and design phase, and will continue to do so during final design regarding impacts, minimization measures, and mitigation measures as part of the Section 4(f) and Section 6(f) processes. Impacts, coordination efforts, and conclusions are summarized in the EA and detailed in the *Section 4(f) and 6(f) Technical Memorandum*, included in Appendix A of the EA. Both of these documents are being revised and will be circulated publicly in early 2021, to include updated efforts since the EA was completed.

**20** The project would include restoration of temporary impacts to park land and a revegetation program to replace trees lost due to the construction of the project where feasible. VDOT has provided a detailed response to the separate letter from the Park Authority indicating a commitment to coordinate on acceptable mitigation for temporary impacts and compensation for permanent impacts. See response to Comment 19 above and Comment 21 below.



- Due to the proximity to parkland, this project should only use common native species including perennials and seed mixes. The Park Authority requests that the applicant utilize common plant species generally native to Fairfax County, including trees, perennials, and seed mixes, to provide the greatest ecosystem benefit.
- Design and Construction Recommendations:
  - Depending on the final scope of the work, spoils should be removed from offsite dumping of debris and properly secured by a barrier to eliminate future offsite dumping on parkland.
  - The extension of noise walls on/near Scotts Run Nature Preserve/Live Oak Drive will need further discussion on the design and potential impacts as the design progresses. The Board acknowledges that VDOT has recently proposed to add the noise wall along the gap at Live Oak Drive.
- Failing Conditions at Studied Intersections
  - The Board acknowledges travel time along the Capital Beltway corridor is generally improved by I-495 NEXT in both 2025 and 2045 once Maryland completes their managed lane system based on the traffic analysis. However, there are adjacent intersections that operate poorly in both the 2025 and 2045 analysis compared to the No-Build scenario. Based on the transportation analysis provided in the Environmental Assessment, there are adjacent intersections that operate poorly compared to the No-Build condition in both 2025 and 2045 analysis. After further evaluation, the I-495 NEXT design plans should incorporate any needed context-sensitive mitigation measures to address the impacts of these intersections.
- Implementation Issues
  - VDOT has made extensive efforts to coordinate with County staff on project designs, pedestrian/bicycle facilities, and stormwater, among other aspects of the project. These efforts are expected to provide substantial opportunity for input and consideration for the implementation of the I-495 NEXT project. The Board emphasizes that these efforts should continue and the following considerations be included with further design efforts:
    - Ensuring that sound walls are replaced rapidly after the existing wall is removed,
    - Minimizing park impacts,
    - Developing an aggressive maintenance of traffic plan for roadway and pedestrian/bicyclist accessibility,
    - Ensuring sufficient time to coordinate traffic and design changes with County staff and Supervisors' offices, as well as the impacted communities,
    - Minimizing night construction in areas adjacent to residential neighborhoods,
    - Maintaining proper erosion, siltation and stormwater management equipment and facilities during construction,
    - Developing an effective landscaping and tree replacement plan,
    - Minimizing disruption during construction,
    - Minimizing construction that impacts bus services especially at peak times, and
    - Including proper temporary roadway striping capable of maintaining visibility at night and in inclement weather.
- Noise Impacts
  - The Board remains concerned about the soundwalls along George Washington Memorial Parkway. The Board requests that VDOT continue coordination with the National Park Service to address any concerns associated with the installation of soundwalls along the George Washington Memorial Parkway.

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Response  
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**21** Mitigation measures proposed for Scott's Run Nature Preserve are summarized in the *Section 4(f) and 6(f) Technical Memorandum* (Appendix A of the EA), and include the following:

- Avoid impacts to the recreational use of the property
- Stabilize areas of land disturbance using a native seed mix as specified by Fairfax County Park Authority
- Minimize potential encroachment by staying within utility easement to the extent possible
- Include connections between the Preserve and the proposed 3.1-mile, 10-foot-wide shared use path, consistent with the County's Trails Plan Map

*Following coordination with FHWA, the following sentence should be added to this response: "Additional mitigation measures developed through ongoing coordination with FCPA is included in the Revised EA."*

**22** Should spoils be found within the proposed limits of disturbance, the Design-Builder will be required to properly dispose of such spoils in accordance with federal, state, and local laws. The comment regarding a barrier to eliminate future offsite dumping is noted. VDOT is working with Dominion Power to address this issue.

**23** The Design-Builder will be responsible for developing the Final Noise Analysis in accordance with federal and state policies, and with respect to the final design. The results of the final noise analysis will be shared with the County at that future date.

**24** The project does not generally increase the traffic demand at the intersections in question; rather, it removes upstream bottlenecks that prevent that traffic from getting to downstream destinations under the No-Build and Existing conditions. A number of the impacted intersections that are within of the I-495 NEXT Limits LOD will be improved as part of this project. The impacted intersections outside of the LOD could be improved by VDOT in partnership with Fairfax County through SMARTSCALE or NVTA funding for intersection improvements or transit operations.

- Due to the proximity to parkland, this project should only use common native species including perennials and seed mixes. The Park Authority requests that the applicant utilize common plant species generally native to Fairfax County, including trees, perennials, and seed mixes, to provide the greatest ecosystem benefit.
- Design and Construction Recommendations:
  - Depending on the final scope of the work, spoils should be removed from offsite dumping of debris and properly secured by a barrier to eliminate future offsite dumping on parkland.
  - The extension of noise walls on/near Scotts Run Nature Preserve/Live Oak Drive will need further discussion on the design and potential impacts as the design progresses. The Board acknowledges that VDOT has recently proposed to add the noise wall along the gap at Live Oak Drive.

Response to these comments are on the previous page

• Failing Conditions at Studied Intersections

- The Board acknowledges travel time along the Capital Beltway corridor is generally improved by I-495 NEXT in both 2025 and 2045 once Maryland completes their managed lane system based on the traffic analysis. However, there are adjacent intersections that operate poorly in both the 2025 and 2045 analysis compared to the No-Build scenario. Based on the transportation analysis provided in the Environmental Assessment, there are adjacent intersections that operate poorly compared to the No-Build condition in both 2025 and 2045 analysis. After further evaluation, the I-495 NEXT design plans should incorporate any needed context-sensitive mitigation measures to address the impacts of these intersections.

• Implementation Issues

- VDOT has made extensive efforts to coordinate with County staff on project designs, pedestrian/bicycle facilities, and stormwater, among other aspects of the project. These efforts are expected to provide substantial opportunity for input and consideration for the implementation of the I-495 NEXT project. The Board emphasizes that these efforts should continue and the following considerations be included with further design efforts:
  - Ensuring that sound walls are replaced rapidly after the existing wall is removed,
  - Minimizing park impacts,
  - Developing an aggressive maintenance of traffic plan for roadway and pedestrian/bicyclist accessibility,
  - Ensuring sufficient time to coordinate traffic and design changes with County staff and Supervisors' offices, as well as the impacted communities,
  - Minimizing night construction in areas adjacent to residential neighborhoods,
  - Maintaining proper erosion, siltation and stormwater management equipment and facilities during construction,
  - Developing an effective landscaping and tree replacement plan,
  - Minimizing disruption during construction,
  - Minimizing construction that impacts bus services especially at peak times, and
  - Including proper temporary roadway striping capable of maintaining visibility at night and in inclement weather.

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• Noise Impacts

- The Board remains concerned about the soundwalls along George Washington Memorial Parkway. The Board requests that VDOT continue coordination with the National Park Service to address any concerns associated with the installation of soundwalls along the George Washington Memorial Parkway.

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**25** • Sound walls: VDOT is committed to working with Transurban and the Design-Build Team to develop a construction program that ensures that sound walls are replaced rapidly after the existing wall is removed.

- Park impacts: VDOT has worked and will continue to work with FCPA and NPS to ensure that the project design and construction minimizes impacts on existing parks.
- Maintenance of traffic: In the final design phase, VDOT will develop a Maintenance of Traffic plan to mitigate impacts during construction. In addition, VDOT will work with key stakeholders, including Fairfax County, to develop a Transportation Management Plan (TMP) to help implement regional measures, such as transit and carpooling programs, to help mitigate impacts during construction.
- Coordination time: VDOT will coordinate with County staff, Supervisor's offices and residents of impacted communities on traffic and design changes throughout the duration of the project.
- Night construction: VDOT will minimize, to the extent possible, night construction in areas adjacent to residential communities.
- Erosion: As required, VDOT will maintain proper erosion, siltation and stormwater management equipment and facilities during construction.
- Landscaping: The project will provide revegetation in affected areas where revegetation is feasible.
- Disruption: VDOT will work with the Design-Build Team to minimize disruption during construction.
- Bus service: The development of construction phasing and maintenance of traffic plans will take into consideration the need to minimize impacts to bus service during peak hours.
- Roadway striping: VDOT will construct the temporary roadway striping and pavement markings in accordance with the VDOT Road and Bridge specifications, as well as the MUTCD and the Virginia Supplement to the MUTCD, to maintain visibility at night and in inclement weather.

VDOT will continue to work with County staff on these issues.

**26** VDOT will coordinate with the National Park Service to address any concerns associated with the installation of sound walls associated with the I-495 NEXT project along the George Washington Parkway that may be determined to be reasonable and feasible. Coordination on sound walls will continue under the more detailed analysis and design.



o The Board also requests that VDOT conform to the previous commitments on soundwall installation as detailed in the March 2009 letter from Secretary Homer.

27

• County Involvement in Design Review Process

o The Board recognizes that the design concepts presented in the EA represent preliminary designs and the Public-Private Partnership are important opportunities to allow creativity in the final design to reduce costs, simplify maneuverability of systems, and further reduce impacts on the community. The Board requests VDOT share the design plans with County staff prior to final approval for major design submittal packages.

28

Additional County comments can be found in the attachments to this letter. Fairfax County appreciates the work that has been undertaken through the design development process to date and the opportunity to provide comments. We also look forward to working closely with the Commonwealth and developing a mutually beneficial project to County residents and the region.

If you have any questions or need additional information, please contact Martha Coello of the Department of Transportation at [Martha.Coello@fairfaxcounty.gov](mailto:Martha.Coello@fairfaxcounty.gov) or 703-877-5682.

Sincerely,



Jeffrey C. McKay  
Chairman

Enclosure:

- Attachment 1: Combined List of Comments from Fairfax County staff on I-495 NEXT Draft Design
- Attachment 2: DPWES Letter to DEQ on I-495 NEXT Water Quality on June 30, 2020
- Attachment 3: DPWES Letter to Natural Resources on State Transportation Project SWM Concerns August 14, 2020 and BOS Letter to VDOT on SWM Requirements July 17, 2019

cc: Members, Fairfax County Board of Supervisors

Bryan J. Hill, County Executive  
Rachel Flynn, Deputy County Executive  
Tom Biesiadny, Director, Department of Transportation  
Helen Cuervo, District Administrator, VDOT, Northern Virginia  
Susan Shaw, Megaprojects Director, VDOT  
Barbara Byron, Director, Department of Planning and Development  
Randy Bartlett, Director, Department of Public Works and Environmental Services  
Kirk Kincannon, Director, Fairfax County Park Authority

**27** VDOT will include as part of the project sound walls that are determined to be needed and reasonable and feasible. Additionally, VDOT will work with Transurban to identify potential mitigation measures to help address noise issues at locations where noise walls are found to not be reasonable and feasible.

**28** VDOT is committed to a continued partnership with Fairfax County and will continue to coordinate with County staff, including sharing the final design plans (or submittal packages) prior to VDOT approval for construction.

**Attachment 1: Fairfax County Staff Comments on I-495 NEXT Draft Design for Public Hearing**

**DPWES Stormwater**

- **SWM Requirements-** The current plan fails to follow the county’s request to meet local stormwater management (SWM) requirements. The project will meet state VSMP regulations as detailed in VDOT IIM-LD-195-12. Additionally, it is the county’s understanding that the project will meet the old grandfathered SWM conditions rather than current requirements.
- **Water Quality-** The project will not meet its on-site water quality requirements. VDOT may ask for an exception from DEQ to meet up to 80% of their phosphorus reduction off site in a nutrient bank outside of Fairfax County. DPWES Stormwater urges VDOT to explore using enhanced outfall stabilization practices to meet the project’s water quality requirements on site. At the August 21, 2020, meeting with VDOT, Virginia Department of Environmental Quality (DEQ), FCDOT, and DPWES staff, VDOT said that the project will incorporate several outfall enhancements into the SWM plan.
- **Water Quantity Control-** Existing 495 lanes largely lack SWM. VDOT’s interpretation of routine maintenance exempts the project’s existing impervious area from the state SWM requirements, so the existing impervious surface will remain largely uncontrolled. The majority of runoff from the new lanes will be piped directly to Scotts Run stream or the Potomac River with no detention, worsening downstream flooding and erosion along Scotts Run. Road flooding impacts both Fairfax County and VDOT infrastructure. Georgetown Pike at Scotts Run Nature Preserve has a history of flooding, most recently in the July 8, 2019, storm. Following the July 8 storm, VDOT replaced roadway and a bridge where Swinks Mill Road crosses Scotts Run. The county is looking at purchasing a repetitive loss property on Swinks Mill Road with FEMA funds. There are also numerous complaints regarding tree loss due to stream erosion downstream of 495. DPWES Stormwater encourages VDOT to pursue underground detention within the ROW to the extent feasible. Underground detention is already proposed in the shoulder along the section of 495 between Lewinsville Road and Old Dominion Drive.
- **Stream and Wetland Impacts-** Based on the current plan, the project will generate about 3,000 linear feet of stream impacts. According to the EA, the plan will also impact 19.8 acres of wetlands. DPWES Stormwater requests VDOT’s design/build team complete permittee-responsible mitigation along Scotts Run, particularly between Lewinsville Road and Old Dominion Drive. This stream section is mostly within VDOT right-of-way and directly adjacent to the project limits. At the August 21, 2020, VDOT agreed to explore on-site stream mitigation.
- **Resource Protection Area (RPA) Impacts-** The EA cites up to 75.5 acres of temporary and permanent impacts to the RPA. Public roads are conditionally exempt from RPA regulation under the Virginia Administrative Code provided that the roadway is designed and constructed in accordance with water quality protection criteria at least as stringent as VDOT requirements. The project will not meet its on-site water quality requirements and require an exemption from DEQ. Given that the project may not meet minimum water quality requirements, DPWES Stormwater requests that the project meet the RPA replanting requirements detailed in Fairfax County Code Chapter 118 Chesapeake Bay Preservation Ordinance and Public Facilities Manual Chapter 12 (12-0316.4) in the Scotts Run stream valley section between Lewinsville Road and Old Dominion Drive.

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*Response to this comment is on the next page*

**29** VDOT presented SWM options to VDEQ to provide a holistic view of impacts to the surrounding properties if the project were to meet County requirements. VDEQ agreed with VDOT’s assessment that the impact to residences and loss of natural habitat were too great to follow more stringent regulations. This documentation has been shared with Fairfax County and the current SWM approach for Project NEXT satisfies meeting the requirements to the maximum extent practicable with the application of both onsite SWM facilities and nutrient credits. This approach was developed through coordination between VDEQ, VDOT and Fairfax County, with Fairfax County staff concurrence for the overall project approach. Using the proposed SWM approach, the conditions would be better following the project than they are today, or than they would be in the future under the No-Build alternative.

**30** Several stormwater management approaches were studied during the preliminary design and environmental documentation phase. VDOT IIM-LD-195.10 applies stormwater requirements to new and reconstructed lanes, shoulders, and shared use paths. VDOT IIM-LD-195.11 applied stormwater requirements to new lanes and shared use paths only. VDOT IIM-LD-195.12 applies stormwater requirements to new lanes, shoulders, and shared use paths.

The current design incorporates VDOT IIM-LD-195.12, which applies stormwater requirements to new lanes, shoulders, and shared use paths. This stormwater management approach excludes applying stormwater requirements to existing impervious areas, including those that will be removed as part of construction and thus will not require stormwater management. The storm system and BMP facilities will be preliminarily designed for capacity to account for the full drainage areas, but when determining peak flow, volume, and velocity targets for water quantity criteria, the Regulated Land Disturbing Activity (RLDA) area will be considered as on-site area and the remaining drainage area will be considered as off-site.

The I-495 NEXT Project will enhance a total of five outfalls along the project corridor. One outfall is required per the permit requirement, the remaining four outfalls have been included as part of the base scope at no cost to the State. In addition, the project will provide stream stabilization along Scotts Run within the Limits of Disturbance for the project.

**31** The proposed drainage features of the 495 project would result in a reduction in water quantity as water leaves the 495 roadway, as well as an improvement in water quality, when compared with conditions that exist today. VDOT continues to work to identify ways to increase this improvement as we move to final design. Given the high traffic volumes in the corridor, and the limited availability of shoulders, there is no plan to locate any underground features within the roadway pavement or shoulders.

**32** Scotts Run is already significantly degraded in this section due to run-off from upstream and adjacent commercial and residential development within the watershed. Transurban — as the concessionaire for the project — has agreed to provide a monetary contribution to Fairfax County that would cover 50% of the cost for stream restoration for approximately 3,000 linear feet of the existing stream. Impacts would be mitigated in accordance with NEPA, following federal, state, and Virginia DEQ regulations.



**Attachment 1: Fairfax County Staff Comments on I-495 NEXT Draft Design for Public Hearing**

**DPWES Stormwater**

- **SWM Requirements-** The current plan fails to follow the county's request to meet local stormwater management (SWM) requirements. The project will meet state VSMP regulations as detailed in VDOT IIM-LD-195-12. Additionally, it is the county's understanding that the project will meet the old grandfathered SWM conditions rather than current requirements.
- **Water Quality-** The project will not meet its on-site water quality requirements. VDOT may ask for an exception from DEQ to meet up to 80% of their phosphorus reduction off site in a nutrient bank outside of Fairfax County. DPWES Stormwater urges VDOT to explore using enhanced outfall stabilization practices to meet the project's water quality requirements on site. At the August 21, 2020, meeting with VDOT, Virginia Department of Environmental Quality (DEQ), FCDOT, and DPWES staff, VDOT said that the project will incorporate several outfall enhancements into the SWM plan.
- **Water Quantity Control-** Existing 495 lanes largely lack SWM. VDOT's interpretation of routine maintenance exempts the project's existing impervious area from the state SWM requirements, so the existing impervious surface will remain largely uncontrolled. The majority of runoff from the new lanes will be piped directly to Scotts Run stream or the Potomac River with no detention, worsening downstream flooding and erosion along Scotts Run. Road flooding impacts both Fairfax County and VDOT infrastructure. Georgetown Pike at Scotts Run Nature Preserve has a history of flooding, most recently in the July 8, 2019, storm. Following the July 8 storm, VDOT replaced roadway and a bridge where Swinks Mill Road crosses Scotts Run. The county is looking at purchasing a repetitive loss property on Swinks Mill Road with FEMA funds. There are also numerous complaints regarding tree loss due to stream erosion downstream of 495. DPWES Stormwater encourages VDOT to pursue underground detention within the ROW to the extent feasible. Underground detention is already proposed in the shoulder along the section of 495 between Lewinsville Road and Old Dominion Drive.
- **Stream and Wetland Impacts-** Based on the current plan, the project will generate about 3,000 linear feet of stream impacts. According to the EA, the plan will also impact 19.8 acres of wetlands. DPWES Stormwater requests VDOT's design/build team complete permittee-responsible mitigation along Scotts Run, particularly between Lewinsville Road and Old Dominion Drive. This stream section is mostly within VDOT right-of-way and directly adjacent to the project limits. At the August 21, 2020, VDOT agreed to explore on-site stream mitigation.
- **Resource Protection Area (RPA) Impacts-** The EA cites up to 75.5 acres of temporary and permanent impacts to the RPA. Public roads are conditionally exempt from RPA regulation under the Virginia Administrative Code provided that the roadway is designed and constructed in accordance with water quality protection criteria at least as stringent as VDOT requirements. The project will not meet its on-site water quality requirements and require an exemption from DEQ. Given that the project may not meet minimum water quality requirements, DPWES Stormwater requests that the project meet the RPA replanting requirements detailed in Fairfax County Code Chapter 118 Chesapeake Bay Preservation Ordinance and Public Facilities Manual Chapter 12 (12-0316.4) in the Scotts Run stream valley section between Lewinsville Road and Old Dominion Drive.

Response to these comments are on the previous page

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**33** The project as proposed would be designed and constructed to meet water quality protection criteria according to state standards and VDOT's requirements. Anticipated RPA impacts are detailed in Section 3.2.4 of the I-495 Natural Resources Technical Report. As noted in the comment, the I-495 NEXT project would meet the exemption conditions since it meets minimum water quality requirements. The final design would be optimized to limit encroachment into RPAs, but no additional RPA mitigation is required. However, a tree survey would be completed as part of the project that would help inform the revegetation plan, and which would be used to minimize long term impacts to natural areas. In addition, an additional contribution is being made to Fairfax County by Transurban to contribute to the County's plan to restore the stretch of Scotts Run that parallels the project corridor but is outside the project's limit of disturbance.

VDOT will coordinate with Fairfax County prior to replanting vegetation in RPAs, although the project is not obligated to adhere to the requirements included in Fairfax County Code Chapter 118 and Public Facilities Manual Chapter 12 (12-0316.4) since the project is meeting minimum water quality requirements.

*Following coordination with FHWA, the following sentence in this response should be revised:*

- *Original text: "However, a tree survey would be completed as part of the project that would help inform the revegetation plan, and which would be used to minimize long term impacts to natural areas."*
- *Replacement text: "The project includes a revegetation program to replace trees lost due to the construction of the project where feasible following construction. In addition, VDOT has committed to providing a tree survey for impacted areas during the design and construction phase of the project, once more detailed plans are available. The tree survey would be used to further document tree impacts and to inform the revegetation plan."*



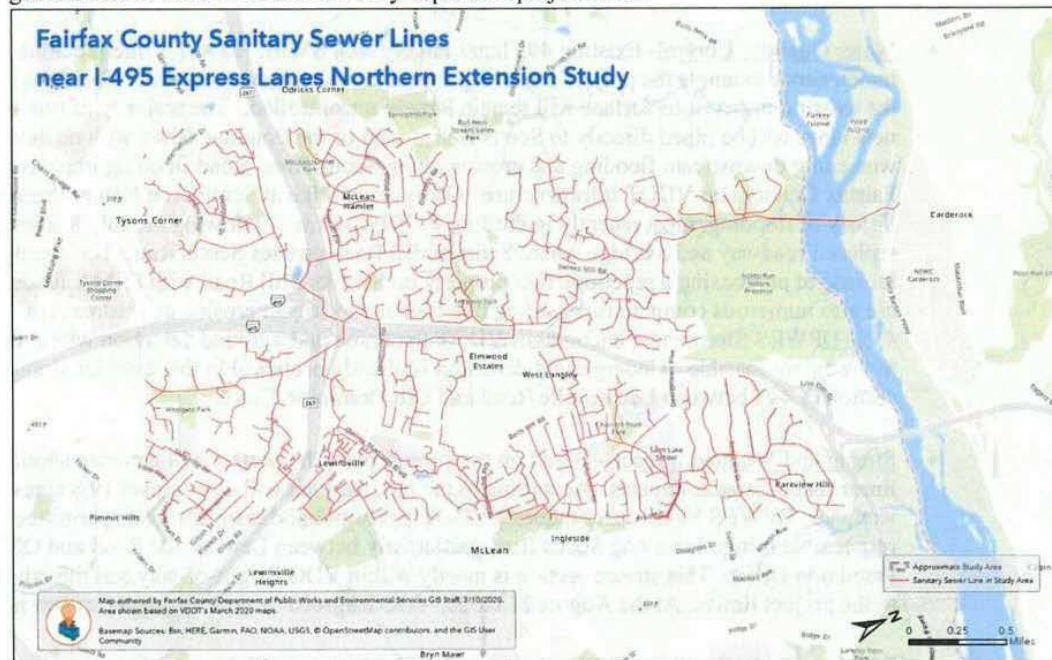
- While DPWES Stormwater recognizes the constraints faced by linear projects like the 495 Express Lanes Northern Extension, we also feel that transportation projects, particularly of this magnitude, should strive to minimize impacts to water quality and our local streams.
- **Revegetation**- When restoring disturbed areas within the 495 project area, DPWES Stormwater requests that VDOT develop and implement a Non-Native Invasive Management Plan (NNIMP), encourages VDOT to restore areas within Waters of the United States corridors with a mix of plants, shrubs, and trees including native plant seed, live stakes, and nursery stock and provide monitoring, invasives treatment, and replanting of restoration areas for a period of two years after construction is complete and restoration vegetation is installed.

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**DPWES Wastewater**

- Please find a map of Fairfax County wastewater infrastructure both crossing and within the general area of the 495 NEXT Beltway expansion project below



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- As the project details become more refined, Fairfax County Wastewater Planning and Monitoring Division (WPMD) will need to be given the opportunity (at an early stage) to review the project design plans for potential impacts on wastewater infrastructure (i.e. relocated storm sewer within close proximity (vertical or horizontal) to wastewater infrastructure, significant cut or fill required for road grading that impacts the depth of the existing wastewater pipes, storm water ponds on top of existing wastewater easements, heavy construction equipment on top of shallow existing sewers, etc.).

**34** The proposed drainage features of the 495 project would result in a reduction in water quantity as water leaves the 495 roadway, as well as an improvement in water quality, when compared with conditions that exist today. VDOT continues to work to identify ways to increase this improvement as we move to final design.

**35** The Project is responsible for meeting all planting and/or replanting requirements required by applicable permits. In addition, following completion of construction, the Project will re-establish vegetation (native grasses and suitable native replacements for trees of 12-inch caliper or greater that were removed) on areas that were disturbed and are not used for any Project elements or facilities. All new or replacement plantings will be maintained through the two-year Project warranty period.

**36** During the final design phase, VDOT would provide draft design plans to the Fairfax County Wastewater Planning and Monitoring Division (WPMD) for their review of potential impacts on wastewater infrastructure. Comments from WPMD will be considered as designs are progressed.



**Fairfax County Public Schools**

- The only concerns are if sections of Old Dominion or Lewinsville roads area going to be closed during construction. Both of these roads have house stops along them and are routes used by the majority of buses that service the Langley/McLean and Great Falls areas. Also construction/ lane closures at the 495 on and off ramps to Georgetown Pike and the backup this will cause during afternoon rush hour. An area that is already going to have backups due to Cooper Middle being under construction.

37

**Department of Neighborhood and Community Services**

- Are pedestrian pathways/ bike lanes protected (from traffic, pollution, noise) by the noise barrier (or other structures) in all places?  
[http://495next.com/documents/pim052019/pim052019\\_presentation\\_v2.pdf](http://495next.com/documents/pim052019/pim052019_presentation_v2.pdf)
  - o Live Oak Drive Design Concept
  - o Georgetown Pike Design Concept
  - o Old Dominion Drive Design Concept
- More information is needed about the “shared use” paths in the proposed designs (see existing proposals for 2025 + 2045 and previous comment about design of pedestrian/bike pathways).

38

**Health Department**

- All new facilities should connect to the existing bicycle and pedestrian network to allow for convenient active transportation options, reducing vehicle emissions and providing users with the opportunity for physical activity.
- All grade crossings should be well marked and visible by drivers. Crossings should prioritize cyclists and pedestrians, including crossings at highway on-ramps and off-ramps, with features such as bike-ped traffic light cycles and other safety measures.
- Every effort should be made to build all shared use paths at once, to provide the greatest connectivity and thus greatest use.
- Every effort should be made to ensure drivers are aware of cyclists and pedestrians in the vicinity of the project. Signage, along with driver outreach and education should be budgeted as part of this project.

39

**Fairfax County Park Authority**

Acquisition of Parkland:

- The United States Department of the Interior (USDOI), Bureau of Outdoor Recreation, approved Project Proposal 51-00053, dated August 17, 1970, for the acquisition of approximately 336 acres of land that was identified as the Burling Tract, with the Land and Water Conservation Fund (LWCF). The Burling Tract was purchased by the Fairfax County Board of Supervisors (BOS), the deed was recorded in Deed Book 3343 at Page 532 on September 4, 1970. The BOS transferred the land to FCPA as recorded in Deed Book 12327 at Page 2170 on October 29, 2001. The Burling Tract includes what is now FCPA Scotts Run Nature Preserve, Tax Map #21-1((1))3, which will be impacted by the VDOT Project. VDOT's Project impacts will likely require a LWCF land conversion process and subject to approval by National Park Service.

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Cultural Resources

- Park Authority staff recommends any areas with ground disturbance throughout the project corridor that are not previously surveyed, undergo Phase I archaeological survey. If sites are

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**37** The development of construction phasing and maintenance of traffic plans will take into consideration the need to minimize impacts to bus service and school operations during peak hours, including at overpasses for Old Dominion Drive, Lewinsville Road, and Georgetown Pike. With respect to the Georgetown Pike interchange ramps and maintenance of traffic during construction, VDOT will continue to work with County staff on these issues.

**38** Comment noted. VDOT has coordinated with Fairfax County during development of the preliminary design, and the proposed shared use path is consistent with the placement recommended in the letter.

**39** The I-495 NEXT preliminary design includes a proposed shared use path that would connect with the adjacent street network and other bicycle and pedestrian facilities, and would include safe crossings at intersections and grade-separated crossings. Additional details—such as signage, lighting, pavement markings, and construction phasing—would be developed during the final design phase.

**40** As noted in Section 3.9 of the EA, the Scott’s Run Nature Preserve was developed with money from the Land and Water Conservation Fund, and therefore is afforded additional protection under Section 6(f) of the Land and Water Conservation Fund Act of 1965 (Public Law 88-578). The Preserve is operated by the FCPA, and VDOT has coordinated with FCPA since inception of the project. Detail about the potential Section 6(f) impacts, the coordination process, and anticipated mitigation measures is in the I-495 NEXT Section 4(f) and 6(f) Technical Memorandum, which is also included as Appendix A of the EA. Updated details on the disposition of the Section 6(f) coordination with FCPA and National Park Service, as well as with the Virginia Department of Conservation and Recreation, since the EA was published will be provided in the Revised EA and Section 4(f) and 6(f) Technical Memo.

**41** Within the Area of Potential Effect (APE), pedestrian surveys and shovel testing were performed in an effort to identify historic archaeological resources. Based on these survey efforts, four archaeological sites were found adjacent to the LOD but would not be impacted by the I-495 NEXT Project. The results of the archaeological survey efforts are summarized further in the *Cultural Resources Survey Report*. The Virginia Department of Historic Resources (VDHR) confirmed on April 7, 2020 that none of the archaeological findings meet eligibility criteria set for in the NRHP and no further work associated with archaeological resources is necessary. This information will be included in the Revised Environmental Assessment.

The *Cultural Resources Survey Report*, appended by reference to the EA, noted that Site 44FX2430 had been identified in a 1999 cultural resources survey, and had been recommended as potentially eligible to the National Register of Historic Places (NRHP). Site 44FX2430 was adjacent to, but not within, the Archaeological APE for the I-495 NEXT project. Since the site is outside of the Archaeological APE, no impacts are anticipated. Therefore, no additional surveys were conducted as part of the I-495 NEXT study. If the LOD shifts during final design so that impacts are possible to Site 44FX2430, additional surveys will be conducted.



found that are potentially significant to the history of Fairfax County, or potentially eligible for inclusion onto the National Register of Historic Places they should undergo Phase II archaeological testing. If sites are found significant or eligible, avoidance or Phase III data recovery is recommended.

- Park Authority staff has conducted archival cultural resources review for the above referenced project. The Environmental Assessment report made no mention of the site, 44FX2430, specifically. The report only mentioned that any sites within their area of impact contained no sites that were eligible, or potentially eligible for inclusion onto the National Register of Historic Places. However, after re-checking the current Virginia Department of Historic Resources (VDHR) status of 44FX2430, the site has NOT been evaluated. Therefore, it is recommended that if the site will be impacted, a Phase II study is necessary in order to determine county significance or eligibility for National Register of Historic Places (NRHP) status. If found significant or eligible, avoidance, or Phase III data recovery is recommended as mitigation.

42

Natural Resources

- All development on Park Authority property must comply with its Policy 201, Natural Resources, and agency-wide Natural Resource Management Plan (NRMP). Of note is Section 7 of the NRMP:

Avoid adverse impacts to natural areas, mitigate unavoidable impacts from construction and maintenance projects and require restoration and rehabilitation of impacted natural resources.

- Minimize impacts to forests, meadows and other natural areas from human use.
- Protect significant natural communities and species.
- Require restoration of impacted natural resources when use of parkland causes damage to them.

If impacts cannot be avoided, staff requests a design that minimizes impacts and a mitigation plan for any losses, which should be coordinated with the Park Authority. This mitigation plan will need to clarify the extent of construction that will occur on Park Authority property as well as the impacts to natural resources.

- Scotts Run Nature Preserve will experience direct impacts of lost parkland, vegetation, habitat and increased storm water discharge, invasive species as well as wildlife impacts. The ecological community impacted by this effort has been classified as Mesic Mixed Hardwood Forest. The area that would be most impacted by this project scored an 11.5 out of 16 in the Non-Native Assessment and Prioritization survey. This categorization makes the area a high priority for active management. It has been treated for invasive plants for several years to maintain ecological integrity.
- Park Authority recommends the rehabilitation for any temporary impacts to natural resources to Park Authority standards and mitigate/compensate for permanent impacts to natural resources on Park Authority managed lands. This requirement shall apply to any natural resource impact (terrestrial or aquatic) that is not regulated under the jurisdiction of any federal or state agency.
- The Park Authority defines permanent impact as any habitat type conversion, for example, forest to grassland, and temporary impact as replacement of the same habitat type or better, for example, grassland to grassland.
- Mitigation/compensation for permanent impacts shall be determined using the Fairfax County Land Development Services 2020 Unit Price Schedule to determine a replacement cost. Forest,

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*Response to these comments are on the next page*

**42** Within the Area of Potential Effect (APE), pedestrian surveys and shovel testing were performed in an effort to identify historic archaeological resources. Based on these survey efforts, four archaeological sites were found adjacent to the LOD but would not be impacted by the I-495 NEXT Project. The results of the archaeological survey efforts are summarized further in the *Cultural Resources Survey Report*. The Virginia Department of Historic Resources (VDHR) confirmed on April 7, 2020 that none of the archaeological findings meet eligibility criteria set for in the NRHP and no further work associated with archaeological resources is necessary. This information will be included in the Revised Environmental Assessment.

The *Cultural Resources Survey Report*, appended by reference to the EA, noted that Site 44FX2430 had been identified in a 1999 cultural resources survey, and had been recommended as potentially eligible to the National Register of Historic Places (NRHP). Site 44FX2430 was adjacent to, but not within, the Archaeological APE for the I-495 NEXT project. Since the site is outside of the Archaeological APE, no impacts are anticipated. Therefore, no additional surveys were conducted as part of the I-495 NEXT study. If the LOD shifts during final design so that impacts are possible to Site 44FX2430, additional surveys will be conducted.

**43** VDOT will meet the requirements of Section 4(f) and Section 6(f) for potential park impacts associated with the project, which are consistent with the criteria of Policy 201 and NRMP Section 7. Scott’s Run Nature Preserve is the only park owned by the Fairfax County Park Authority (FCPA) that is within the LOD, and therefore is anticipated to be impacted. Two other parks —Timberly Park and McLean Hamlet Park—are within the study area, but not within the LOD, as described in Section 3.8.1 of the EA. Based on the preliminary design, approximately 3.21 acres of the Preserve are within the LOD, with approximately 1.20 acres anticipated to be permanent impact and 2.01 acres anticipated to be temporary easements. Since the Preserve is a publicly owned and publicly accessible recreational area, it is protected under Section 4(f). In addition, since the Preserve was developed with money from the Land and Water Conservation Fund (LWCF), it is also protected under Section 6(f). VDOT and FHWA have coordinated FCPA during the preliminary planning and design phase, and will continue to do so during final design regarding impacts, minimization measures, and mitigation measures as part of the Section 4(f) and Section 6(f) processes. Impacts, coordination efforts, and conclusions are summarized in the EA and detailed in the *Section 4(f) and 6(f) Technical Memorandum*, included in Appendix A of the EA. Both of these documents are being revised and will circulate publicly in early 2021, to include updated efforts since the EA was completed.

*Following coordination with FHWA, the following sentence in this response should be revised:*

- *Original text:* “Based on the preliminary design, approximately 3.21 acres of the Preserve are within the LOD, with approximately 1.20 acres anticipated to be permanent impact and 2.01 acres anticipated to be temporary easements.”
- *Replacement text:* “Based on the preliminary design, approximately 4.11 acres of the Preserve are within the LOD, with approximately 1.10 acres anticipated to be permanent impact and 3.01 acres anticipated to be temporary easements (these updated impact number are in the Revised EA).”



found that are potentially significant to the history of Fairfax County, or potentially eligible for inclusion onto the National Register of Historic Places they should undergo Phase II archaeological testing. If sites are found significant or eligible, avoidance or Phase III data recovery is recommended.

- Park Authority staff has conducted archival cultural resources review for the above referenced project. The Environmental Assessment report made no mention of the site, 44FX2430, specifically. The report only mentioned that any sites within their area of impact contained no sites that were eligible, or potentially eligible for inclusion onto the National Register of Historic Places. However, after re-checking the current Virginia Department of Historic Resources (VDHR) status of 44FX2430, the site has NOT been evaluated. Therefore, it is recommended that if the site will be impacted, a Phase II study is necessary in order to determine county significance or eligibility for National Register of Historic Places (NRHP) status. If found significant or eligible, avoidance, or Phase III data recovery is recommended as mitigation.

Natural Resources

- All development on Park Authority property must comply with its Policy 201, Natural Resources, and agency-wide Natural Resource Management Plan (NRMP). Of note is Section 7 of the NRMP:

Avoid adverse impacts to natural areas, mitigate unavoidable impacts from construction and maintenance projects and require restoration and rehabilitation of impacted natural resources.

- Minimize impacts to forests, meadows and other natural areas from human use.
- Protect significant natural communities and species.
- Require restoration of impacted natural resources when use of parkland causes damage to them.

If impacts cannot be avoided, staff requests a design that minimizes impacts and a mitigation plan for any losses, which should be coordinated with the Park Authority. This mitigation plan will need to clarify the extent of construction that will occur on Park Authority property as well as the impacts to natural resources.

- Scotts Run Nature Preserve will experience direct impacts of lost parkland, vegetation, habitat and increased storm water discharge, invasive species as well as wildlife impacts. The ecological community impacted by this effort has been classified as Mesic Mixed Hardwood Forest. The area that would be most impacted by this project scored an 11.5 out of 16 in the Non-Native Assessment and Prioritization survey. This categorization makes the area a high priority for active management. It has been treated for invasive plants for several years to maintain ecological integrity.
- Park Authority recommends the rehabilitation for any temporary impacts to natural resources to Park Authority standards and mitigate/compensate for permanent impacts to natural resources on Park Authority managed lands. This requirement shall apply to any natural resource impact (terrestrial or aquatic) that is not regulated under the jurisdiction of any federal or state agency.
- The Park Authority defines permanent impact as any habitat type conversion, for example, forest to grassland, and temporary impact as replacement of the same habitat type or better, for example, grassland to grassland.
- Mitigation/compensation for permanent impacts shall be determined using the Fairfax County Land Development Services 2020 Unit Price Schedule to determine a replacement cost. Forest,

Response to these comments are on the previous page

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**44 & 45** VDOT has completed an extensive study of existing human and natural resources and evaluated opportunities to avoid or minimize impacts to these resources, as documented in the EA and supporting technical reports. VDOT is continuing to coordinate with the National Park Service regarding impacts to the George Washington Memorial Parkway (GWMP) and other parkland, and will continue working with the State Historic Preservation Office, US Corps of Engineers, Virginia Department of Environmental Quality, and other agencies during final design and the permitting process to further minimize impacts as the design is refined. Other elements that will be completed during the final design, such as development of a landscaping plan and a final traffic noise assessment, will provide additional information to the public and local agencies about anticipated impacts and mitigation measures.

Coordination with the National Park Service (NPS) and Virginia Department of Historic Resources (VDHR) regarding potential impacts to the GWMP began in June 2018 with scoping letters, and has included multiple meetings with the NPS and VDHR regarding the GWMP and adjacent parklands. Overall, the NPS expressed their concern regarding tree canopy and herbaceous plant removal, design aesthetics, potential I-495 express lane signage options/locations throughout the GWMP, and the amount of potential permanent and temporary easements needed at the I-495 tie-in location with the GWMP. On April 7, 2020, the VDHR stated that the GWMP is the only historic resource that may be impacted by the proposed project and that Design Option 1 will have the least effect on the GWMP. At VDOT’s request, on April 8, 2020, VDHR expanded their position on possible effects to historic properties. VDHR went on to state that Design Option 1 as presented in the February 2020 Visualization Booklet would have the least effect on the GWMP and that if the NPS selects Design Option 1 to move forward with, then the Build Alternative would have a No Adverse Effect on the GWMP. Additional coordination is scheduled for early 2021, and will continue through final design. Details on coordination and decisions made to date will be included in the Revised EA.

The project would include restoration of temporary impacts to park land and a revegetation program to replace trees lost due to the construction of the project where feasible. VDOT has provided a detailed response to the separate letter from the Park Authority indicating a commitment to coordinate on acceptable mitigation for temporary impacts and compensation for permanent impacts. See response to Comment 43 above and Comment 46 below.

Mitigation measures proposed for Scott’s Run Nature Preserve are summarized in the *Section 4(f) and 6(f) Technical Memorandum* (Appendix A of the EA), and include the following:

- Avoid impacts to the recreational use of the property
- Stabilize areas of land disturbance using a native seed mix as specified by Fairfax County Park Authority
- Minimize potential encroachment by staying within utility easement to the extent possible
- Include connections between the Preserve and the proposed 3.1-mile, 10-foot-wide shared use path, consistent with the County's Trails Plan Map

Following coordination with FHWA, the following sentence should be added to this response: “Additional mitigation measures developed through ongoing coordination with FCPA are included in the Revised EA.”



woodland, and shrubland habitat types shall be mitigated/compensated for at \$61,049 an acre, and grassland shall be mitigated/compensated for at \$14,520 an acre. Total impacts and mitigation/compensation costs shall be determined upon completion of the site design.

- Due to the proximity to parkland, staff requests the use of only common native species including perennials and seed mixes on this project since non-native species either do not fare as well as natives or are invasive, negatively impacting the environmental health of Park Authority property. The Park Authority requests that the applicant utilize common plant species generally native to Fairfax County, including trees, perennials, and seed mixes, to provide the greatest ecosystem benefit.
- The Park Authority requests the results of any endangered species surveys conducted in preparation to or as part of this project.
- Park Authority recommends stabilization of areas within the construction footprint within Scott's Run Nature Preserve using a native seed mix as specified by the FCPA. Once construction is complete, FCPA will rehabilitate these areas to the habitat type. VDOT will compensate FCPA to design, install and maintain these rehabilitated areas for up to three (3) years.
- Any impacts that extend beyond the Limits of Disturbance (LOD), including root and branch pruning, must follow Policy 201 for Natural Resources or be mitigated/compensated for.
- The FCPA requests the results of any endangered species surveys conducted in preparation to or as part of this project.
- Staff has reviewed the Environmental Assessment and has several recommended edits and/or corrections that pertain to description of parkland, habitat classification, migratory bird, bat, and forest dwelling species impacts, and the inclusion of the Potomac Heritage National Scenic Trail within the project limits.

Design and Construction Recommendations:

- Depending on the final scope of the work, staff recommends the removal of spoils from offsite dumping of debris, then at the end of the project have VEPCO secure their easement access with a gate or other barrier type feature to eliminate future offsite dumping on parkland.
- The Park Authority recommends pedestrian facilities be constructed on both sides of the Georgetown Pike overpass to provide adequate access to Scotts Run Nature Preserve to minimize the number of unsignalized crossings of Georgetown Pike as possible.
- The Park Authority supports the continuation of the proposed pedestrian/bicycle facilities heading north along Balls Hill Road and continuing to the American Legion Bridge for future connectivity into Maryland.
- The potential extension of noise walls on/near Scotts Run Nature Preserve / Live Oak Drive will need further discussion as the design progresses.

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Response to these comments are on the next page

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VDOT has completed an extensive study of existing human and natural resources and evaluated opportunities to avoid or minimize impacts to these resources, as documented in the EA and supporting technical reports.

VDOT is continuing to coordinate with the National Park Service regarding impacts to the George Washington Memorial Parkway (GWMP) and other parkland, and will continue working with the State Historic Preservation Office, US Corps of Engineers, Virginia Department of Environmental Quality, and other agencies during final design and the permitting process to further minimize impacts as the design is refined. Other elements that will be completed during the final design, such as development of a landscaping plan and a final traffic noise assessment, will provide additional information to the public and local agencies about anticipated impacts and mitigation measures.

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The results of the preliminary threatened and endangered species review, performed using Virginia Department of Wildlife Resources (VDWR) 's database, are presented in the *495 NEXT Natural Resources Technical Report* and summarized in the February 2020 EA. This list has recently been expanded upon, in coordination with the National Park Service, and will be updated in the Revised EA and Natural Resources Technical Report that are anticipated to be published in Spring 2021.

The project would include restoration of temporary impacts to park land and a revegetation program to replace trees lost due to the construction of the project where feasible. VDOT has provided a detailed response to the separate letter from the Park Authority indicating a commitment to coordinate on acceptable mitigation for temporary impacts and compensation for permanent impacts.

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- Include connections between the Preserve and the proposed 3.1-mile, 10-foot-wide shared use path, consistent with the County's Trails Plan Map

Additional mitigation measures developed through ongoing coordination with FCPA will be included in the Revised EA.



woodland, and shrubland habitat types shall be mitigated/compensated for at \$61,049 an acre, and grassland shall be mitigated/compensated for at \$14,520 an acre. Total impacts and mitigation/compensation costs shall be determined upon completion of the site design.

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- The Park Authority supports the continuation of the proposed pedestrian/bicycle facilities heading north along Balls Hill Road and continuing to the American Legion Bridge for future connectivity into Maryland.
- The potential extension of noise walls on/near Scotts Run Nature Preserve / Live Oak Drive will need further discussion as the design progresses.

*Response to these comments are on the previous page*

**47**

**47** Should spoils be found within the proposed limits of disturbance, the Design-Builder will be required to properly dispose of such spoils in accordance with federal, state, and local laws. The comment regarding a barrier to eliminate future offsite dumping is noted. VDOT is working with Dominion Power to address this issue.

In response to comments from the public received following the I-495 NEXT Design and Location Public Hearing held in October 2020, the typical section of the Georgetown Pike bridge over I-495 was modified. The original concept proposed a 99-foot wide bridge that included a 10-foot wide shared use path on the south side of the bridge, adjacent to the eastbound lanes of Georgetown Pike. The shared use path would be separated from the vehicular travel lanes by a concrete barrier and railing. The revised design widens the bridge to 105.5 feet in order to supplement the shared use path on the south side of the bridge with a 6-foot wide sidewalk at the back of curb on the north side of the bridge. At the request of the Fairfax County Park Authority, a new trail segment was added in the northwest quadrant of the interchange between the southbound off-ramp and Linganore Road, in order to connect the proposed north side sidewalk with the existing trail between Linganore Road and the Scotts Run Nature Preserve entrance.

The I-495 NEXT project's proposed shared use path would be paved up to Live Oak Drive; beyond that, grading for a future trail connection to GWMP would extend to the proposed on-ramp from I-495 to GWMP in the 2025 Interim Year design (prior to Maryland's Managed Lane project being open). The National Park Service does not support a connection between the proposed shared use path and the existing natural-surface Potomac National Scenic Heritage Trail on GWMP property. Therefore, the shared use path parallel to I-495 would then be extended further to the north across the ALMB in a later phase, with the assumption that the bridge will be improved as part of Maryland's Managed Lane project.

The Design-Builder will be responsible for developing the Final Noise Analysis in accordance with federal and state policies, and with respect to the final design. The results of the final noise analysis will be shared with the County at that future date.

**Department of Transportation**

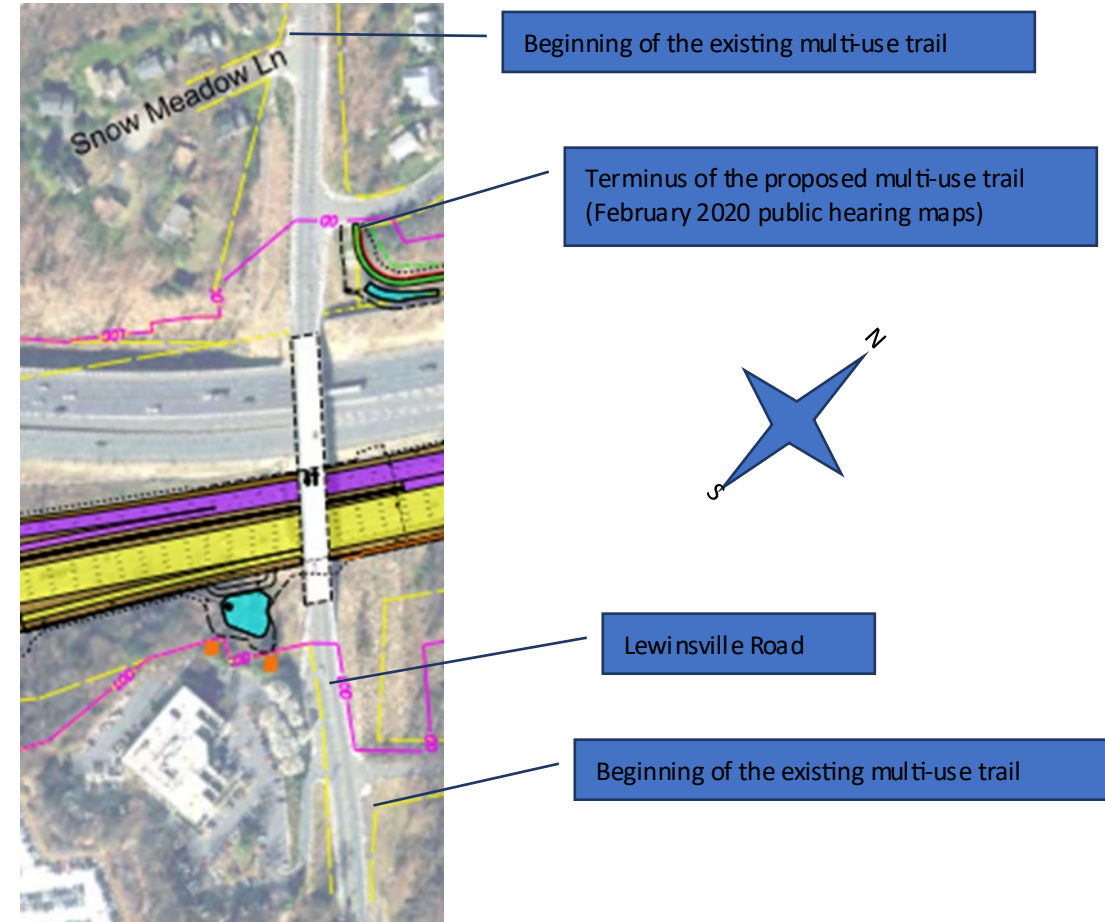
- Fairfax County staff has suggested a grade-separated crossing of Lewinsville Rd in addition to the at-grade connection on the north side of Lewinsville Rd. VDOT responded that the grade separation would provide a connection to a trail system outside the scope of this project and would require a separate feasibility study but will consider to include at-grade crosswalk across Lewinsville Rd to connect the existing shared-use path on the south side. Fairfax County staff previously suggested and continues to recommend routing the proposed SUP under the bridge and connect to the existing path south of the bridge along Lewinsville Rd.
- Shared-use path should be added on the south side of Georgetown Pike from Balls Hill Rd to just east of Dead Run Dr.
- It is important to the trail system on Virginia side to include the segment in this project on the east side of I-495 cross the on ramp to George Washington Parkway with or without the managed lane project on Maryland side.
- Project should retain the wide shoulder area on Route 193 between Balls Hill Rd and the I-495 inner loop ramp.
- I-495 inner loop on ramp at Route 193 should be widened to two lanes further than existing to accommodate extra volume from Georgetown Pike. This was contemplated several years ago in relation to congestion problem at Route 193 / Balls Hill Rd.
- Balls Hill Road / Georgetown Pike - VDOT is installing an island on WB Georgetown Pike at Balls Hill Road to prevent the right lane from being used for through movements. This island should be included in the design.
- Balls Hill Road / Georgetown Pike - VDOT has a proposal to modify NB Balls Hills Road to a two-lane approach. The centerline of Balls Hill Road south of Georgetown Pike would be shifted to the west using the adjacent VDOT parcel to accommodate the widening. This will likely be completed before this project and should be reflected in the plans.
- Balls Hills Road / NB I-495 Ramp - VDOT has proposed prohibiting the NB through movement across Georgetown Pike. Please confirm whether that movement is allowed in the current concept but it should be prohibited.
- The County has presented VDOT with alternative designs for the Tysons East Dulles Connector. Plans for the 495 Express lanes should not preclude future construction of the Connector.
- Based on the current design, there is no exit from Express Lane between Rt 123 and GW Parkway, exist should be considered or other alternatives should be provided to the surrounding communities.

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*Response to these comments are on the next page*

**48** As VDOT has responded previously, a grade-separated crossing of Lewinsville Road is outside the scope of this project. Since the I-495 NEXT project is not replacing the Lewinsville Road bridge over I-495 or changing the I-495 edge of pavement on the north side, this project would not preclude a future multi-use path connection under the bridge. VDOT is evaluating potential changes to the plans to address the issue of how users of the proposed multi-use path cross Lewinsville Road at grade at the path terminus. VDOT has coordinated and will continue to coordinate with FCDOT through the preliminary design phase, and would continue to do so during future design phases.



**49** The I-495 NEXT project’s proposed shared use path ends just east of Balls Hill Road, tying into the existing sidewalk that connects Georgetown Pike to Cooper Middle School. An extension further east to Dead Run Drive is beyond the project footprint, and out of the scope of the I-495 NEXT project, although this project does not preclude an extension from being built in the future.



**Department of Transportation**

- Fairfax County staff has suggested a grade-separated crossing of Lewinsville Rd in addition to the at-grade connection on the north side of Lewinsville Rd. VDOT responded that the grade separation would provide a connection to a trail system outside the scope of this project and would require a separate feasibility study but will consider to include at-grade crosswalk across Lewinsville Rd to connect the existing shared-use path on the south side. Fairfax County staff previously suggested and continues to recommend routing the proposed SUP under the bridge and connect to the existing path south of the bridge along Lewinsville Rd.
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*Response to these comments are on the previous page*

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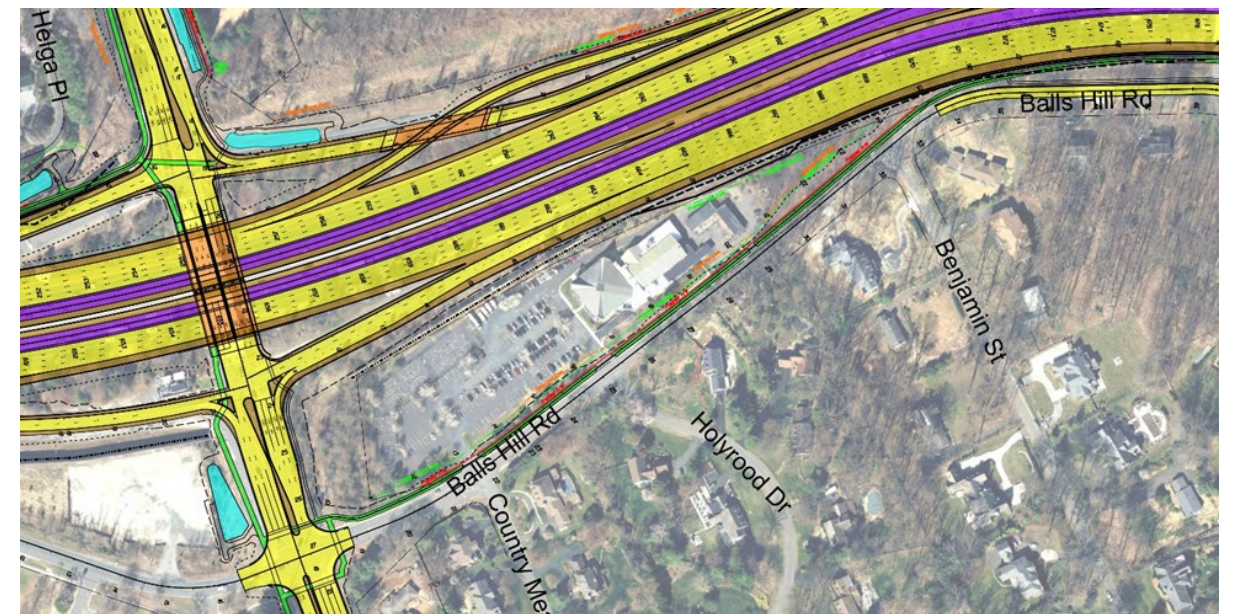
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**51** VDOT has coordinated with FCDOT on recent revisions to the design of the Georgetown Pike/Route 193 interchange, including the lane striping between Balls Hill Road and the I-495 northbound ramps. The wide shoulder area noted is currently proposed to be retained. Additional details on shoulder widths along Georgetown Pike between Balls Hill Road and I-495 northbound ramps would be considered during the final design phase. VDOT has coordinated with FCDOT through the preliminary design phase, and would continue to do so during future design phases.

**52** One of the I-495 NEXT project goals is to improve traffic operations, such as reducing traffic in the general purpose lanes to an extent that the queue spillback on the northbound on-ramp at this interchange is substantially reduced. At this location, the VDOT Project Team re-evaluated the on-ramp configuration based on meetings with Fairfax County, the Great Falls Citizens Association, and McLean Citizens Association to address the queuing concern. The proposed ramp configuration from Georgetown Pike to northbound I-495 has been modified since the Design Public Hearing Plans were released in February 2020 to address concerns about queuing on the on-ramp. The proposed revised configuration for the northbound ramp would provide:

- 3 lanes for approximately 350 feet
- 2 lanes for approximately 1,400 feet
- A revised merge configuration at I-495, with a 2-lane on-ramp joining the I-495 general purpose lanes; the second ramp lane would end approximately 300 feet after the merge with I-495.

A schematic of the proposed updated configuration for the on-ramp is shown on the right. Designs will continue to be refined based on public input and cost and impact information.





**Department of Transportation**

- Fairfax County staff has suggested a grade-separated crossing of Lewinsville Rd in addition to the at-grade connection on the north side of Lewinsville Rd. VDOT responded that the grade separation would provide a connection to a trail system outside the scope of this project and would require a separate feasibility study but will consider to include at-grade crosswalk across Lewinsville Rd to connect the existing shared-use path on the south side. Fairfax County staff previously suggested and continues to recommend routing the proposed SUP under the bridge and connect to the existing path south of the bridge along Lewinsville Rd.
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- The County has presented VDOT with alternative designs for the Tysons East Dulles Connector. Plans for the 495 Express lanes should not preclude future construction of the Connector.
- Based on the current design, there is no exit from Express Lane between Rt 123 and GW Parkway, exist should be considered or other alternatives should be provided to the surrounding communities.

*Response to these comments are on the previous page*

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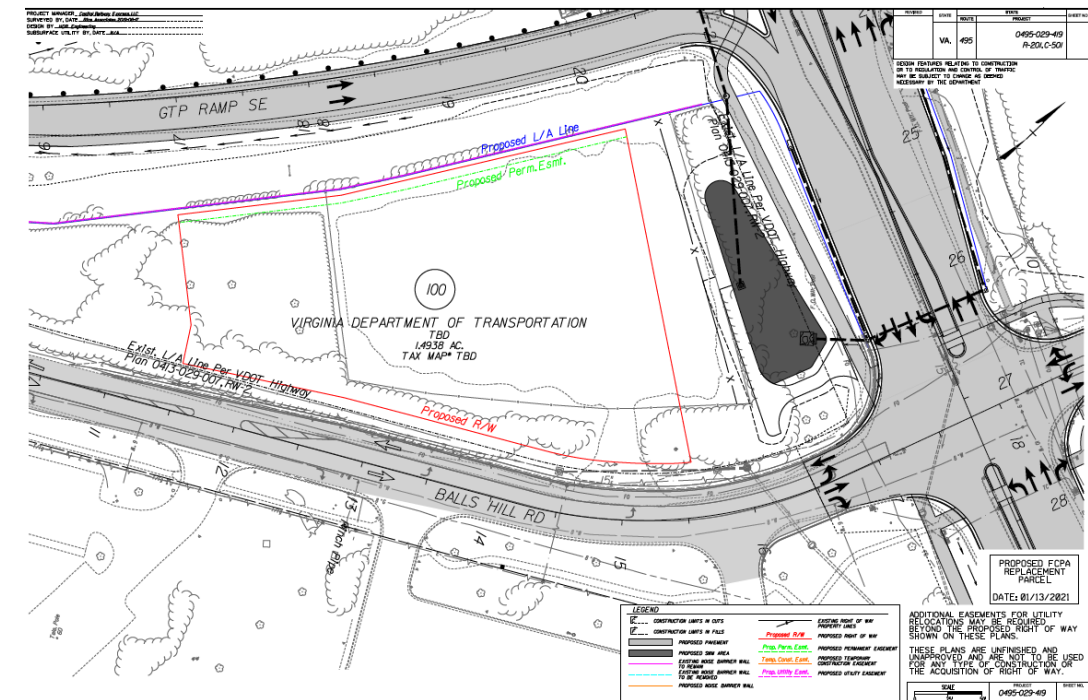
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**57**

**53** VDOT has been coordinating with FCDOT on revisions to the design of the Georgetown Pike/Route 193 interchange. The traffic analysis incorporates this island, which prevents the westbound right-turn lane at Balls Hill Road from being used as a westbound through lane. An island would be included in the final design plans.

**54** The modified northbound approach of Balls Hill Road intersection (and updated signal phasing) have been included in the traffic analysis, and the two-lane approach would be included in the plans during final design.

**55** The modified design of the Balls Hill Road and Georgetown Pike intersection that was recently implemented modifies the northbound approach; on Balls Hill Road, the northbound approach includes a dedicated northbound left turn lane, through lane, and right turn lane as shown below. Details of the lane channelization on the northbound approach of the ramp terminal intersection, and potential through movement restrictions, would be reevaluated as the design progresses in the detailed design phase.



**56** VDOT has held several meetings with FCDOT staff to coordinate on the Tysons East Dulles Connector project, including discussion of potential conceptual plans for the Connector. At the time the preliminary conceptual design and traffic analysis for this project was conducted, a preferred alternative had not been selected or submitted for inclusion into the regional Constrained Long-Range Plan (CLRP). Therefore, the Connector is not considered a “reasonably foreseeable project” for purpose of the NEPA studies. However, the Ultimate 2045 design configuration would not preclude the eventual Tysons East Dulles Connector project from being implemented.

**57** VDOT is continuing to coordinate with Transurban, FCDOT, and local neighborhood associations to determine the appropriate path forward with regard to providing access out of the northbound Express Lanes or into the southbound Express Lanes in this area.





COMMONWEALTH OF VIRGINIA  
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 BOARD OF SUPERVISORS  
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JEFFREY C. MCKAY  
 CHAIRMAN

December 3, 2020

The Honorable Shannon Valentine  
 Secretary of Transportation  
 Commonwealth of Virginia  
 Patrick Henry Building, Third Floor  
 1111 East Broad Street  
 Richmond, Virginia 23219

Reference: Fairfax County Comments on I-495 Express Lanes Northern Extension Project Environmental Assessment

Dear Secretary Valentine:

On December 1, 2020, the Fairfax County Board of Supervisors approved comments regarding the I-495 Express Lanes Northern Extension (I-495 NEXT) Project Environmental Assessment. I-495 NEXT project is important to Fairfax County. The Board continues to support the Commonwealth's efforts to reduce congestion and provide additional travel choices in the Capital Beltway Corridor and to move the most people as efficiently as possible in this region. The project's proximity to Tysons and McLean also signifies that improvements in the Corridor will have lasting effects on accessibility and increased economic opportunity for surrounding communities in Fairfax County. As VDOT's own studies demonstrate, the project provides significant benefits only if Maryland completes their system of managed lanes, particularly increasing the capacity of the American Legion Bridge. In the interim, the project will cause inequitable and, therefore, unacceptable delays to non-Express Lane traffic. Construction of the project will also cause massive disruption to neighborhoods in and around McLean and Tysons as well as permanent damage to parks, stormwater, streams, and private property with no equivalent benefits without Maryland's managed lanes. Therefore, it is imperative that VDOT only consider final action on the I-495 NEXT project once Maryland has successfully executed a comprehensive agreement with a developer to complete their system of managed lanes.

Considering the implications of the I-495 NEXT project, it is essential that citizens are well informed of its scope and resulting impacts. As previously communicated, the Board requests that VDOT continue to allow time for the public to provide feedback on the project prior to executing a final contract with the concessionaire.

Fairfax County has been engaged with this project from its inception and appreciates VDOT's efforts to address many of the project issues. The Board looks forward to continued and improved coordination as project design progresses. As part of those efforts, the Board offers the following comments regarding the I-495 NEXT Environmental Assessment released in February 2020. These comments should not be construed as a County endorsement of the I-495 NEXT project.

- o 2025 Traffic Operations Prior to Maryland Managed Lanes

- o The Board acknowledges VDOT's effort to analyze the 2025 traffic conditions in the event managed lanes north of the American Legion Memorial Bridge (ALMB) in Maryland are not complete. Based on the measures of effectiveness established in the report, there are impacts to travel time along General Purpose (GP) Lanes on I-495 NB with this Build scenario in both the

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*Comment continued on next page*

**1** VDOT continues to work to identify measures that could be employed to improve traffic operations both during construction, and in the interim period before Maryland implements their program. Although the traffic study for 2025 horizon year identified some potential degradation to travel times during NB peak periods, it also showed that cut-through traffic would be reduced, and that overall, more people would be moved and delays at some key intersections are improved. VDOT will continue to coordinate with Fairfax County on traffic operations issues and minimization of traffic impacts as the project development process progresses.

AM and PM. In addition, there are intersections in the study area that are degraded in both No Build and Build scenarios, which should be evaluated for context-sensitive mitigation measures. Based on the current schedule, I-495 NEXT is expected to be completed prior to Maryland's system of managed lanes. Considering the interim time period between the full operation of both systems, it is critical that VDOT address the temporary impacts of opening prior to Maryland's managed lanes.

See comment response on previous page

- Since the project will be more effective once Maryland improves the American Legion Bridge, the Board recommends that VDOT continue to closely coordinate with Maryland on the two projects to ensure that these transportation improvements are well integrated and beneficial to the region. Recognizing that Maryland has solicited proposals from multiple private partners for their project, including improvements to the American Legion Bridge as a first phase, the Board strongly urges that VDOT make every effort to minimize the time between the opening of I-495 NEXT and the Maryland project.

2

○ Stormwater

- The Board recognizes the importance of transportation projects to our community. However, it is also critical to minimize the negative water quality impacts that the additional impervious area has on County watersheds. This is critically important in the McLean area adjacent to the I-495 NEXT project, which has experienced significant flooding during recent storms. Based on the current plan, VDOT anticipates about 3,000 linear feet of stream impacts, mostly located along Scotts Run between Lewinsville Road and Old Dominion Drive. Increased imperviousness from the I-495 NEXT project has a significant potential to exacerbate already prevalent stream degradation and flooding issues, particularly at Scotts Run.

For over a year, County staff has worked with VDOT to coordinate the efforts on stormwater management design for this project. As has been discussed in meetings and via the attached letters to Department of Environmental Quality (Attachment 2) and to Office of the Secretary of Natural Resources (Attachment 3), VDOT should pursue on-site restoration of Scotts Run within the project limits and state transportation projects should meet local standards for stormwater management when the local standards are more stringent to the extent possible. Most recent discussions with VDOT indicate the potential to partner with Fairfax County on stream restoration for Scotts Run. Though these discussions are ongoing, such a partnership would be in addition to the project's regulatory requirements and the project's planned purchase of stream impact credits from an approved stream restoration bank.

Along with comments in Attachment 1, the Board requests VDOT consider these requests below prior to advancing the I-495 NEXT project:

- Stormwater Management (SWM) Requirements –The Board requests that this project meet the current County SWM requirements rather than the state grandfathered SWM conditions. As stated in the letter to VDOT on July 17, 2019, and presented in Attachment 3, Fairfax County's criteria is more stringent than VSMP Parts II B and II C of VSMP Regulations, and the Board requests that this project meet these SWM requirements. If meeting our local stormwater management requirements is not attainable, VDOT should implement requirements to the maximum extent practicable and provide documentation demonstrating that the technical requirements are not fully feasible.

3

**2** VDOT continues to work closely with Maryland to align the design of Project NEXT with the selected alternative that results from Maryland's environmental process. It is a focus of Virginia to not only provide a seamless connection but to also focus on efficient construction to minimize disruption to the traveling public.

**3** VDOT presented SWM options to VDEQ to provide a holistic view of impacts to the surrounding properties if the project were to meet County requirements. VDEQ agreed with VDOT's assessment that the impact to residences and loss of natural habitat were too great to follow more stringent regulations. This documentation has been shared with Fairfax County and the current SWM approach for Project NEXT satisfies meeting the requirements to the maximum extent practicable with the application of both onsite SWM facilities and nutrient credits. This approach was developed through coordination between VDEQ, VDOT and Fairfax County, with Fairfax County staff concurrence for the overall project approach. Using the proposed SWM approach, the conditions would be better following the project than they are today, or than they would be in the future under the No-Build alternative.



- **Water Quantity Control** – The majority of runoff from the new lanes will be piped directly to Scotts Run stream or the Potomac River with no detention, worsening downstream flooding and erosion along Scotts Run. Road flooding impacts both Fairfax County and VDOT infrastructure. The Board is also concerned about tree loss due to stream erosion downstream of I-495. The Board acknowledges that the provision of underground detention may present difficulties with relation to future maintenance and safety. However, the Board requests VDOT pursue underground detention within the right-of-way to the extent feasible to prevent negative impacts to Scotts Run and downstream areas. **4**
- **Stream and Wetland Impacts** – Based on the current plan, the project will generate up to 3,000 linear feet of stream impacts and affect 19.8 acres of impacted wetlands. County staff has requested additional consideration for permittee-responsible mitigation along Scotts Run, particularly between Lewinsville Road and Old Dominion Drive. This stream section is mostly within VDOT right-of-way and directly adjacent to the project limits. Discussions with VDOT on this stream restoration are ongoing. **5**
- **Water Quality** – VDOT’s interpretation of routine maintenance exempts the project’s existing impervious area from the state SWM requirements, so the existing impervious surface will remain largely untreated. Under county stormwater standards, the existing impervious area would also be treated. Additionally, the project will not meet its minimum on-site water quality requirements and will purchase 80 percent of its required nutrient reduction offsite outside of Fairfax County. The Board requests VDOT apply enhanced outfall stabilization practices to meet the project’s water quality requirements on site to the extent possible. **6**
- **Resource Protection Area (RPA) Impacts** – The Environmental Assessment (EA) cites up to 75.5 acres of temporary and permanent impacts to the RPA. Public roads are conditionally exempt from RPA regulation under the Virginia Administrative Code provided that the roadway is designed and constructed in accordance with water quality protection criteria at least as stringent as VDOT requirements. Given that the project will not meet minimum water quality requirements, the Board requests that the project meet the RPA replanting requirements detailed in Fairfax County Code Chapter 118 Chesapeake Bay Preservation Ordinance and Public Facilities Manual Chapter 12 (12-0316.4) in the Scotts Run stream valley section between Lewinsville Road and Old Dominion Drive. **7**

While the Board recognizes the constraints faced by linear projects like I-495 NEXT, we also believe that transportation projects, particularly of this magnitude, should strive to minimize negative effects on water quality, local streams, and ultimately the Chesapeake Bay. The cumulative impact from the project’s failure to address each of the bullets above will worsen the already degraded condition of the Scotts Run stream valley. Although there are limited options to manage stormwater within the right-of-way, there are other mitigation opportunities within the Scotts Run watershed. Those additional mitigation opportunities are being discussed with VDOT, and the Board is committed to working with VDOT to help meet the project’s stormwater obligations.

- Bike/Pedestrian Facilities

**4** The proposed drainage features of the 495 project would result in a reduction in water quantity as water leaves the 495 roadway, as well as an improvement in water quality, when compared with conditions that exist today. VDOT continues to work to identify ways to increase this improvement as we move to final design. Given the high traffic volumes in the corridor, and the limited availability of shoulders, there is no plan to locate any underground features within the roadway pavement or shoulders.

**5** Scotts Run is already significantly degraded in this section due to run-off from upstream and adjacent commercial and residential development within the watershed. Transurban — as the concessionaire for the project — has agreed to provide a monetary contribution to Fairfax County that would cover 50% of the cost for stream restoration for approximately 3,000 linear feet of the existing stream. Impacts would be mitigated in accordance with NEPA, following federal, state, and Virginia DEQ regulations.

**6** The project would include enhancement of a total of five outfalls along the project corridor. One outfall is required per the permit requirement, and the remaining four outfalls have been included as part of the base scope at no cost to the Commonwealth. In addition, the project would provide stream stabilization along Scotts Run within the Limits of Disturbance for the project.

**7** The project as proposed would be designed and constructed to meet water quality protection criteria according to state standards and VDOT’s requirements. Anticipated RPA impacts are detailed in Section 3.2.4 of the I-495 Natural Resources Technical Report. As noted in the comment, the I-495 NEXT project would meet the exemption conditions since it meets minimum water quality requirements. The final design would be optimized to limit encroachment into RPAs, but no additional RPA mitigation is required. However, a tree survey would be completed as part of the project that would help inform the revegetation plan, and which would be used to minimize long term impacts to natural areas. In addition, an additional contribution is being made to Fairfax County by Transurban to contribute to the County’s plan to restore the stretch of Scotts Run that parallels the project corridor, but is outside the project’s limit of disturbance.

VDOT will coordinate with Fairfax County prior to replanting vegetation in RPAs, although the project is not obligated to adhere to the requirements included in Fairfax County Code Chapter 118 and Public Facilities Manual Chapter 12 (12-0316.4) since the project is meeting minimum water quality requirements.

*Following coordination with FHWA, the following sentence in this response should be revised:*

- *Original text: “However, a tree survey would be completed as part of the project that would help inform the revegetation plan, and which would be used to minimize long term impacts to natural areas.”*
- *Replacement text: “The project includes a revegetation program to replace trees lost due to the construction of the project where feasible following construction. In addition, VDOT has committed to providing a tree survey for impacted areas during the design and construction phase of the project, once more detailed plans are available. The tree survey would be used to further document tree impacts and to inform the revegetation plan.”*



- The bicycle and pedestrian facilities are critical to addressing the varied mobility needs of the region. Fairfax County's Comprehensive Plan recommends a major regional trail along I-495. Such a facility is intended as a link between Maryland and Virginia. The I-495 NEXT project has committed to providing this trail. The provision of this major regional trail is imperative to providing nonmotorized transportation alternatives and reducing single occupancy vehicles in the region. As the Commonwealth coordinates with Maryland on improvements to the ALMB, all efforts should be taken to ensure the continuation of this trail into Maryland for pedestrians and bicyclists.
- Tysons is located at the southern end of the I-495 NEXT project. The connection of pedestrian and bicycle facilities as part of this major regional trail and along the secondary streets to Tysons is critical to providing a comprehensive transportation network that meets the needs of this growing community. Currently, this major regional trail ends at Lewinsville Road, north of Tysons. We encourage VDOT to make all efforts to provide a safe and consistent connection from this major regional trail to and within Tysons.
- The I-495 NEXT project should make all efforts to promote pedestrian and bicycle connections to this major regional trail and along secondary streets throughout the project corridor.
- VDOT should continue coordination with the surrounding community on the location of the trail.

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○ Enhanced Transit

- A clear advantage of the managed lanes is that they support more reliable and more efficient bus service in the corridor. The Board acknowledges the I-495 American Legion Bridge Transit and TDM Study led by Maryland Department of Transportation (MDOT)/ Maryland Transit Administration (MTA) and Virginia Department of Rail and Public Transportation (DRPT), which seeks to find multimodal solutions for the corridor. Prior to the completion of this study, it is imperative that additional community outreach occur to ensure that feedback from the community is considered in any final recommendations. In addition to this effort, Fairfax County has included a new bus route over ALMB in its Transit Network Study. Considering the potential for new transit routes via the Express Lanes, VDOT should incorporate the findings and recommendations of the Transit and TDM Study and County's Transit Network Study prior to final action on I-495 NEXT.
- Due to its location, I-495 NEXT has the potential to serve as a key link in transit accessibility between Maryland and Virginia, including Fairfax County and its economic centers like Tysons. It is Fairfax County's understanding that discussions are still ongoing with the concessionaire regarding the project agreement; however, it is critical that VDOT work with the concessionaire to secure transit capital and operating funds that will promote transit access along the corridor. Dedicated transit funding associated with this project is essential towards reducing single-occupancy vehicle ridership, vehicle miles traveled in the area, and encouraging a sustainable transportation system.

*Response  
to these  
comments  
are on the  
next page*

○ Elevated Ramps

- Some flyover and interchange ramps along the project have been designed with high elevations to allow for adequate clearances and connections between travel lanes. Alternative concepts to the high elevation ramps should be evaluated and considered for minimizing noise, visual and right-of-way impacts upon nearby residential communities. This is a special concern regarding the ramp from the northbound I-495 Express Lanes to George Washington Parkway and the interchange at Dulles Toll Road and I-495.
- A separate reassessment of the design and environmental impacts should be completed before construction of any ramps beyond Phase 1 of the Dulles Toll Road and I-495 interchange. The

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The Build Alternative includes an approximately 3.1-mile, 10-foot-wide shared use path, consistent with the *Fairfax Countywide Trails Plan Map*. VDOT is coordinating with Maryland on connectivity of the proposed trail between the two states. VDOT plans for the first phase of the trail to be constructed up to Live Oak Drive as part of the I-495 NEXT project, where it can tie in to the Potomac Heritage Trail on the west side of I-495 at Live Oak Drive. Maryland has indicated that they are committed to providing for a trail on the American Legion Bridge.

9

A potential means of routing users from the south end of the proposed shared use path to Tysons could be to use the existing shared use path on the north side of Lewinsville Road, from Timberly Lane to Route 123/Great Falls Street, then along the Dolley Madison Boulevard Walkway — recently completed as part of the Tysons Metrorail Station Access Improvement Projects — between Great Falls Street and the McLean Metro Station at Scotts Crossing Road in Tysons.

VDOT coordinated with Fairfax County staff early in the project development process and demonstrated through a preliminary high-level assessment that a direct connection via a grade-separated viaduct to Tysons would have constructability issues due to engineering and topography constraints, as well as environmental and right-of-way impacts, and could cost more than \$30M.

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The project would provide a total of six connections from the proposed shared use path to the existing trail network. The VDOT team has worked to evaluate requests for a number of connections, accounting for wetlands, park lands, topography, and right-of-way impacts, which constrained some of the options considered.

11

VDOT has and will continue to coordinate the alignment and design elements of the path with residents of the surrounding communities, pedestrian and bicycle trail advocacy groups and Fairfax County staff. The trail would be available for use by local residents and will be part of the regional multimodal network.



- The bicycle and pedestrian facilities are critical to addressing the varied mobility needs of the region. Fairfax County's Comprehensive Plan recommends a major regional trail along I-495. Such a facility is intended as a link between Maryland and Virginia. The I-495 NEXT project has committed to providing this trail. The provision of this major regional trail is imperative to providing nonmotorized transportation alternatives and reducing single occupancy vehicles in the region. As the Commonwealth coordinates with Maryland on improvements to the ALMB, all efforts should be taken to ensure the continuation of this trail into Maryland for pedestrians and bicyclists.
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- VDOT should continue coordination with the surrounding community on the location of the trail.

Response to these comments are on the previous page

○ Enhanced Transit

○ A clear advantage of the managed lanes is that they support more reliable and more efficient bus service in the corridor. The Board acknowledges the I-495 American Legion Bridge Transit and TDM Study led by Maryland Department of Transportation (MDOT)/ Maryland Transit Administration (MTA) and Virginia Department of Rail and Public Transportation (DRPT), which seeks to find multimodal solutions for the corridor. Prior to the completion of this study, it is imperative that additional community outreach occur to ensure that feedback from the community is considered in any final recommendations. In addition to this effort, Fairfax County has included a new bus route over ALMB in its Transit Network Study. Considering the potential for new transit routes via the Express Lanes, VDOT should incorporate the findings and recommendations of the Transit and TDM Study and County's Transit Network Study prior to final action on I-495 NEXT.

12

○ Due to its location, I-495 NEXT has the potential to serve as a key link in transit accessibility between Maryland and Virginia, including Fairfax County and its economic centers like Tysons. It is Fairfax County's understanding that discussions are still ongoing with the concessionaire regarding the project agreement; however, it is critical that VDOT work with the concessionaire to secure transit capital and operating funds that will promote transit access along the corridor. Dedicated transit funding associated with this project is essential towards reducing single-occupancy vehicle ridership, vehicle miles traveled in the area, and encouraging a sustainable transportation system.

13

○ Elevated Ramps

○ Some flyover and interchange ramps along the project have been designed with high elevations to allow for adequate clearances and connections between travel lanes. Alternative concepts to the high elevation ramps should be evaluated and considered for minimizing noise, visual and right-of-way impacts upon nearby residential communities. This is a special concern regarding the ramp from the northbound I-495 Express Lanes to George Washington Parkway and the interchange at Dulles Toll Road and I-495.

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○ A separate reassessment of the design and environmental impacts should be completed before construction of any ramps beyond Phase 1 of the Dulles Toll Road and I-495 interchange. The

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Comment continued on next page

**12** The Virginia Department of Rail and Public Transportation is conducting the I-495 American Legion Bridge Transit and TDM Study in coordination with the Maryland Department of Transportation's Maryland Transit Administration (MTA). The recommendations resulting from this study are aimed to work in concert with Virginia's proposed northern extension of the I-495 Express Lanes and Maryland's proposed managed lanes program for the American Legion Bridge, I-495, and I-270. Study information is available at <http://drpt.virginia.gov/transit/major-initiatives/i-495american-legion-bridge-transit-and-tdm-study/>.

The Virginia Department of Rail and Public Transportation (DRPT) held a virtual public meeting for the Transit and TDM Study at the Northern Virginia Transportation Authority (NVTA) on November 12, 2020. Additionally, DRPT gave a presentation to the Transportation Committee of the Fairfax County Board of Supervisors on December 8, 2020. The project team held a public meeting to discuss the findings and recommendations of the study on January 12, 2021. DRPT received Fairfax County's comment letter on the study on February 2, 2021. DRPT will respond to those comments and will update the final draft report for the Transit and TDM Study, which is expected to be completed in winter of 2021.

[Following coordination with FHWA, the reference to "winter 2021" in the sentence above should be revised to "spring 2021"]

Because this study is a separate effort, the findings and recommendations from the Transit and TDM Study are not being included in the NEPA document. However, VDOT is reviewing the recommendations of the study to help develop a Transportation Management Plan (TMP) that would help improve traffic operations during construction. Based on the recommendations of the transit and TDM study, the TMP may include the implementation of a new route or new routes between Virginia and Maryland.

As indicated in the November 30, 2020 letter from Secretary Valentine to Chairman McKay, Virginia is committed to providing dedicated, ongoing support for transit services along the I-495 corridor as part of the I-495 NEXT project. This commitment ensures the 495 NEXT project, together with the existing 495 Express Lanes, will provide multimodal solutions to move more people.

As indicated in the November 30, 2020 letter from Secretary Valentine to Chairman McKay, Virginia is committed to providing dedicated, ongoing support for transit services along the I-495 corridor as part of the I-495 NEXT project. This commitment ensures the 495 NEXT project, together with the existing 495 Express Lanes, will provide multimodal solutions to move more people.

**13** In general, extending the 495 Express Lanes creates new opportunities for buses, carpools and other transit use by providing faster and more reliable travel. Additionally, VDOT will work to ensure that corridor improvement funding to support transit improvements be included in a final project agreement with Transurban, and will coordinate closely with Fairfax County on those details. Transit improvements would be based on recommendations supporting bi-state travel from the joint Virginia and Maryland Transit and Transportation Demand Management Study, which is scheduled to be completed in early 2021.

**14** VDOT evaluated a number of ramp configuration options at interchanges within the project study area. These options were presented at the May 20, 2019 Public Information Meeting. Throughout the preliminary design, VDOT has made adjustments to the project ramps to reduce impacts to the adjacent communities. During final design, VDOT would work with the Design-Build team to continue to enhance the design to minimize impacts to the adjacent communities. VDOT continue to work collaboratively with Maryland at the project interface.

**15** VDOT has signed an Agreement with the Federal Highway Administration (Determination of Operational Independence and Non-Concurrent Construction for I-495 Express Lanes Northern Extension Project dated September 11, 2020) that stipulates that updated studies will be conducted prior to the implementation of future phases of the project. Furthermore, VDOT is committed to conducting outreach efforts prior to the implementation of future phases of the project. Phase 2 would be constructed after 2030 and no later than 2034, and the final phases associated with the Ultimate Configuration would be constructed after 2040 and no later than 2045.



reassessment should also include a significant community engagement effort to ensure the community is well informed of any impacts and has an opportunity to provide input on the design.

See comment  
response on  
previous page

- VDOT should consider an additional sensitivity analysis that more clearly addresses the timing and need for the future phases of the Dulles Toll Road and I-495 interchange in relation to the traffic scenarios presented.

16

- Failing Conditions at Studied Intersections

- The Board acknowledges travel time along the Capital Beltway corridor, as shown in the traffic analysis, is generally improved by I-495 NEXT in both 2025 and 2045 once Maryland completes their managed lane system. However, there are adjacent intersections that operate poorly in both the 2025 and 2045 analysis compared to the No-Build scenario. VDOT should further analyze the traffic operations at these impacted intersections and evaluate the potential for context-sensitive mitigation measures. Funding should be provided from the I-495 NEXT project or VDOT to address any necessary improvements on these impacted intersections.

17

- Implementation Issues

- VDOT has made extensive efforts to coordinate with County staff on project designs, pedestrian/bicycle facilities, and stormwater, among other aspects of the project. These efforts are expected to provide substantial opportunity for input and consideration for the implementation of the I-495 NEXT project. The Board emphasizes that these efforts should continue and the following considerations be included:
  - Ensuring that sound walls are replaced rapidly after the existing wall is removed,
  - Minimizing park impacts,
  - Developing an aggressive maintenance of traffic plan for roadway and pedestrian/bicyclist accessibility,
  - Ensuring sufficient time to coordinate traffic and design changes with County staff and Supervisors' offices, as well as the impacted communities,
  - Minimizing night construction in areas adjacent to residential neighborhoods,
  - Maintaining proper erosion, siltation and stormwater management equipment and facilities during construction,
  - Developing an effective landscaping and tree replacement plan,
  - Minimizing disruption during construction,
  - Minimizing construction that impacts bus services especially at peak times, and
  - Including proper temporary roadway striping capable of maintaining visibility at night and in inclement weather.

18

- Environmental Issues

- As indicated in the Department of Planning and Development's (DPD) letter to the Department of Environmental Quality, to address the environmental objectives of the Comprehensive Plan and avoid undue impacts to community resources, the project should consider the following recommendations:
  - Avoidance or minimization of impacts to properties that are located on the National Register of Historic Places, including the George Washington Memorial Parkway and Georgetown Pike.

See comment  
response on  
next page

**16** See response to Comment 15. VDOT will perform additional sensitivity analyses between the completion of Phase 1 and prior to additional phases of construction in order to validate the timing and need for future improvements at the Dulles Toll Road interchange. These analyses will address both traffic and safety, as well as environmental impacts. Based on the EA, and the Constrained Long-Range Plan (CLRP) approved by the National Capital Region Transportation Planning Board, the last phase of construction is expected to be completed after 2040, and no later than 2045.

**17** The project does not generally increase the traffic demand at the intersections in question; rather, it removes upstream bottlenecks that prevent that traffic from getting to downstream destinations under the No-Build and Existing conditions. A number of the impacted intersections that are within of the I-495 NEXT Limits of Disturbance (LOD) will be improved as part of this project. The impacted intersections outside of the LOD could be improved by VDOT in partnership with Fairfax County through SMARTSCALE or NVTA funding for intersection improvements or transit operations.

- **18** Sound walls: VDOT is committed to working with Transurban and the Design-Build Team to develop a construction program that ensures that sound walls are replaced rapidly after the existing wall is removed.
- Park impacts: VDOT has worked and will continue to work with FCPA and NPS to ensure that the project design and construction minimizes impacts on existing parks.
- Maintenance of traffic: In the final design phase, VDOT will develop a Maintenance of Traffic plan to mitigate impacts during construction. In addition, VDOT will work with key stakeholders, including Fairfax County, to develop a Transportation Management Plan (TMP) to help implement regional measures, such as transit and carpooling programs, to help mitigate impacts during construction.
- Coordination time: VDOT will coordinate with County staff, Supervisor's offices and residents of impacted communities on traffic and design changes throughout the duration of the project.
- Night construction: VDOT will minimize, to the extent possible, night construction in areas adjacent to residential communities.
- Erosion: As required, VDOT will maintain proper erosion, siltation and stormwater management equipment and facilities during construction.
- Landscaping: The project will provide revegetation in affected areas where revegetation is feasible.
- Disruption: VDOT will work with the Design-Build Team to minimize disruption during construction.
- Bus service: The development of construction phasing and maintenance of traffic plans will take into consideration the need to minimize impacts to bus service during peak hours.
- Roadway striping: VDOT will construct the temporary roadway striping and pavement markings in accordance with the VDOT Road and Bridge specifications, as well as the MUTCD and the Virginia Supplement to the MUTCD, to maintain visibility at night and in inclement weather.

VDOT will continue to work with County staff on these issues.



- Avoidance or minimization of impacts to the two properties on the Fairfax County Inventory of Historic Sites (Beaufort Park and Shiloh Baptist Church).
- Assessment, minimization, avoidance, and mitigation of the direct and indirect impacts to the three properties identified in the Virginia Outdoors Plan (George Washington Memorial Parkway, Scotts Run Nature Preserve, and the 4.6-acre private property near Langley Club).
- Optimization of road alignments and designs to prevent or otherwise minimize encroachment in Resource Protection Areas (RPAs) and adverse effects on water quality.
- Assessment of the impacts to Dead Run, Scotts Run, and Turkey Run and the downstream impacts to the Potomac River.
- Perform ecological resource surveys for the Scotts Run Nature Preserve and the George Washington Memorial Parkway stream corridors.
- Assess the environmental services and the economic, social, and health benefits of the urban forest that would be lost due to the clearing associated with this project, as well as compensation for these impacts.
- Reforest all disturbed areas with commitments to compensation, soil rebuilding, and the restoration of native plant communities.
- Integrate of invasives control throughout the project area. Most recent discussions with VDOT have indicated that the I-495 NEXT project is considering a funding contribution towards invasive species management to be used along the corridor.
- Clarify the current status of and expectations regarding noise mitigation, to include potential barrier locations and design details. It is acknowledged that VDOT has recently proposed to add soundwall along the gap at Live Oak Drive, but the Board remains concerned about the soundwalls along George Washington Memorial Parkway. The Board requests that VDOT continue coordination with the National Park Service to address any concerns associated with the installation of soundwalls along the George Washington Memorial Parkway. Furthermore, the Board requests that VDOT conform to the previous commitments on soundwall installation as detailed in the March 2009 letter from Secretary Homer.

19

More detailed comments from DPD (Attachment 4 and Attachment 5) regarding some of these issues can also be found at the end of this letter.

o Park Impacts

o Cultural Resources:

- Any areas with ground disturbance throughout the project corridor that are not previously surveyed should undergo a Phase I archaeological survey. If sites are found that are potentially significant to the history of Fairfax County, or potentially eligible for inclusion onto the National Register of Historic Places, they should undergo Phase II archaeological testing. If sites are found significant or eligible, avoidance or Phase III data recovery is recommended.
- Park Authority staff has conducted archival cultural resources review. The Environmental Assessment report made no mention of the site, 44FX2430, specifically. The report only mentioned that any sites within their area of impact contained no sites that were eligible, or potentially eligible for inclusion onto the National Register of Historic Places (NRHP), but did not evaluate the Virginia Department of Historic Resources (VDHR) status of 44FX2430. If the site will be

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Comment continued on next page

**19** VDOT has completed an extensive study of existing human and natural resources and evaluated opportunities to avoid or minimize impacts to these resources, as documented in the EA and supporting technical reports. VDOT is continuing to coordinate with the National Park Service regarding impacts to the George Washington Memorial Parkway (GWMP) and other parkland, and will continue working with the State Historic Preservation Office, US Corps of Engineers, Virginia Department of Environmental Quality, and other agencies during final design and the permitting process to further minimize impacts as the design is refined. Other elements that will be completed during the final design, such as development of a landscaping plan and a final traffic noise assessment, will provide additional information to the public and local agencies about anticipated impacts and mitigation measures.

Coordination with the National Park Service (NPS) and Virginia Department of Historic Resources (VDHR) regarding potential impacts to the GWMP began in June 2018 with scoping letters, and has included multiple meeting with the NPS and VDHR regarding the GWMP and adjacent parklands. Overall, the NPS expressed their concern regarding tree canopy and herbaceous plant removal, design aesthetics, potential I-495 express lane signage options/locations throughout the GWMP, and the amount of potential permanent and temporary easements needed at the I-495 tie-in location with the GWMP. On April 7, 2020, the VDHR stated that the GWMP is the only historic resource that may be impacted by the proposed project and that Design Option 1 will have the least effect on the GWMP. At VDOT's request, on April 8, 2020, VDHR expanded their position on possible effects to historic properties. VDHR went on to state that Design Option 1 as presented in the February 2020 Visualization Booklet would have the least effect on the GWMP and that if the NPS selects Design Option 1 to move forward with, then the Build Alternative would have a No Adverse Effect on the GWMP. Additional coordination is scheduled for early 2021, and will continue through final design. Details on coordination and decisions made to date will be included in the Revised EA.

**20** Within the Area of Potential Effect (APE), pedestrian surveys and shovel testing were performed in an effort to identify historic archaeological resources. Based on these survey efforts, four archaeological sites were found adjacent to the LOD but would not be impacted by the I-495 NEXT Project. The results of the archaeological survey efforts are summarized further in the *Cultural Resources Survey Report*. The Virginia Department of Historic Resources (VDHR) confirmed on April 7, 2020 that none of the archaeological findings meet eligibility criteria set for in the NRHP and no further work associated with archaeological resources is necessary. This information will be included in the Revised Environmental Assessment.

**21** The *Cultural Resources Survey Report*, appended by reference to the EA, noted that Site 44FX2430 had been identified in a 1999 cultural resources survey, and had been recommended as potentially eligible to the National Register of Historic Places (NRHP). Site 44FX2430 was adjacent to, but not within, the Archaeological APE for the I-495 NEXT project. Since the site is outside of the Archaeological APE, no impacts are anticipated. Therefore, no additional surveys were conducted as part of the I-495 NEXT study. If the LOD shifts during final design so that impacts are possible to Site 44FX2430, additional surveys will be conducted.



impacted, a Phase II study is necessary to determine county significance or eligibility for NRHP status. If found significant or eligible, avoidance, or Phase III data recovery is recommended as mitigation.

See comment response on previous page

o Natural Resources

- All development on Park Authority property must comply with its Policy 201, Natural Resources, and agency-wide Natural Resource Management Plan (NRMP). Of note is Section 7 of the NRMP:

Avoid adverse impacts to natural areas, mitigate unavoidable impacts from construction and maintenance projects and require restoration and rehabilitation of impacted natural resources.

- Minimize impacts to forests, meadows and other natural areas from human use.
- Protect significant natural communities and species.
- Require restoration of impacted natural resources when use of parkland causes damage to them.

If impacts cannot be avoided, the Board requests a design that minimizes impacts and a mitigation plan for any losses, which should be coordinated with the Park Authority. This mitigation plan will need to clarify the extent of construction that will occur on Park Authority property, as well as the impacts to natural resources.

- The Park Authority recommends the rehabilitation for any temporary impacts to natural resources to Park Authority standards and mitigate/compensate for permanent impacts to natural resources on Park Authority managed lands. This requirement applies to any natural resource impact (terrestrial or aquatic) that is not regulated under the jurisdiction of any federal or state agency.
- Due to the proximity to parkland, the Board requests the use of only common native species, including perennials and seed mixes, on this project since non-native species either do not fare as well as natives or are invasive, negatively impacting the environmental health of Park Authority property. The Park Authority requests that VDOT use common plant species generally native to Fairfax County, including trees, perennials, and seed mixes, to provide the greatest ecosystem benefit.

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• Environmental Justice

- o The EA identified one census block group with over 50% minority population. As the project proceeds, efforts should be undertaken to ensure sufficient outreach for this community as this project progresses.
- o Fairfax County encourages the use of 30% or 50% of Area Median Income to more accurately accounting for economically vulnerable households given the high median income of the County.

See comment response on next page

Additional County comments can be found in the attachments to this letter. Fairfax County appreciates the work that has been undertaken to date in this project and the opportunity to provide comments. We also look forward to working closely with the Commonwealth and developing a mutually beneficial project to County residents and the region.

**22** VDOT will meet the requirements of Section 4(f) and Section 6(f) for potential park impacts associated with the project, which are consistent with the criteria of Policy 201 and NRMP Section 7. Scott's Run Nature Preserve is the only park owned by the Fairfax County Park Authority (FCPA) that is within the LOD, and therefore is anticipated to be impacted. Two other parks — Timberly Park and McLean Hamlet Park—are within the study area, but not within the LOD, as described in Section 3.8.1 of the EA. Based on the preliminary design, approximately 4.11 acres of the Preserve are within the LOD, with approximately 1.10 acres anticipated to be permanent impact and 3.01 acres anticipated to be temporary easements (these updated impact number will be in the Revised EA). Since the Preserve is a publicly owned and publicly accessible recreational area, it is protected under Section 4(f). In addition, since the Preserve was developed with money from the Land and Water Conservation Fund (LWCF), it is also protected under Section 6(f). VDOT and FHWA have coordinated FCPA during the preliminary planning and design phase, and will continue to do so during final design regarding impacts, minimization measures, and mitigation measures as part of the Section 4(f) and Section 6(f) processes. Impacts, coordination efforts, and conclusions are summarized in the EA and detailed in the *Section 4(f) and 6(f) Technical Memorandum*, included in Appendix A of the EA. Both of these documents are being revised and will be circulated publicly in early 2021, to include updated efforts since the EA was completed.

**23** The project would include restoration of temporary impacts to park land and a revegetation program to replace trees lost due to the construction of the project where feasible. VDOT has provided a detailed response to the separate letter from the Park Authority indicating a commitment to coordinate on acceptable mitigation for temporary impacts and compensation for permanent impacts. See response to Comment 22 above and Comment 24 below.

**24** Mitigation measures proposed for Scott's Run Nature Preserve are summarized in the *Section 4(f) and 6(f) Technical Memorandum* (Appendix A of the EA), and include the following:

- Avoid impacts to the recreational use of the property
- Stabilize areas of land disturbance using a native seed mix as specified by Fairfax County Park Authority
- Minimize potential encroachment by staying within utility easement to the extent possible
- Include connections between the Preserve and the proposed 3.1-mile, 10-foot-wide shared use path, consistent with the County's Trails Plan Map

Following coordination with FHWA, the following sentence should be added to this response: "Additional mitigation measures developed through ongoing coordination with FCPA will be included in the Revised EA."



impacted, a Phase II study is necessary to determine county significance or eligibility for NRHP status. If found significant or eligible, avoidance, or Phase III data recovery is recommended as mitigation.

See comment  
response on  
previous page

o Natural Resources

- All development on Park Authority property must comply with its Policy 201, Natural Resources, and agency-wide Natural Resource Management Plan (NRMP). Of note is Section 7 of the NRMP:

Avoid adverse impacts to natural areas, mitigate unavoidable impacts from construction and maintenance projects and require restoration and rehabilitation of impacted natural resources.

- Minimize impacts to forests, meadows and other natural areas from human use.
- Protect significant natural communities and species.
- Require restoration of impacted natural resources when use of parkland causes damage to them.

If impacts cannot be avoided, the Board requests a design that minimizes impacts and a mitigation plan for any losses, which should be coordinated with the Park Authority. This mitigation plan will need to clarify the extent of construction that will occur on Park Authority property, as well as the impacts to natural resources.

- The Park Authority recommends the rehabilitation for any temporary impacts to natural resources to Park Authority standards and mitigate/compensate for permanent impacts to natural resources on Park Authority managed lands. This requirement applies to any natural resource impact (terrestrial or aquatic) that is not regulated under the jurisdiction of any federal or state agency.
- Due to the proximity to parkland, the Board requests the use of only common native species, including perennials and seed mixes, on this project since non-native species either do not fare as well as natives or are invasive, negatively impacting the environmental health of Park Authority property. The Park Authority requests that VDOT use common plant species generally native to Fairfax County, including trees, perennials, and seed mixes, to provide the greatest ecosystem benefit.

• Environmental Justice

- o The EA identified one census block group with over 50% minority population. As the project proceeds, efforts should be undertaken to ensure sufficient outreach for this community as this project progresses.
- o Fairfax County encourages the use of 30% or 50% of Area Median Income to more accurately accounting for economically vulnerable households given the high median income of the County.

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Additional County comments can be found in the attachments to this letter. Fairfax County appreciates the work that has been undertaken to date in this project and the opportunity to provide comments. We also look forward to working closely with the Commonwealth and developing a mutually beneficial project to County residents and the region.

**25** The outreach program developed for the I-495 NEXT project incorporated census data for the census block groups that encompass the study area, characteristics of residences and businesses within the study area, and potential impacts to the community within the LOD. There is one block group with an identified minority population, within the southeast portion of the project. Specific minority outreach was not conducted because there are no residences within this portion of the Limits of Disturbance.

**26** The I-495 NEXT analysis for low-income populations followed the FHWA Title VI Program, which is broader than the Title VI statute and encompasses other nondiscrimination statutes and authorities including Section 162(a) of the Federal-Aid Highway Act of 1973, the Age Discrimination Act of 1975, Section 504 of the Rehabilitation Act of 1973 / Americans with Disabilities Act of 1990, Executive Order 13166, and Executive Order 12898 which defines Federal Actions to Address Environmental Justice in Minority and Low-Income Populations (1994). FHWA Order 6640.23A establishes policies and procedures for FHWA to use in complying with Executive Order 12898.

The Honorable Shannon Valentine  
December 3, 2020  
Page 8

If you have any questions or need additional information, please contact Martha Coello of the Department of Transportation at [Martha.Coello@fairfaxcounty.gov](mailto:Martha.Coello@fairfaxcounty.gov) or 703-877-5682.

Sincerely,



Jeffrey C. McKay  
Chairman

Enclosure:

- Attachment 1: Combined List of Comments from Fairfax County staff on I-495 NEXT EA
- Attachment 2: DPWES Letter to DEQ on I-495 NEXT Water Quality on June 30, 2020
- Attachment 3: DPWES Letter to Natural Resources on State Transportation Project SWM Concerns August 14, 2020 and BOS Letter to VDOT on SWM Requirements July 17, 2019
- Attachment 4: DPD Letters to Comment on I-495 NEXT EA
- Attachment 5: DPD Letter to DEQ on I-495 & I-270 Managed Lanes Study Draft EIS August 31, 2020

cc: Members, Fairfax County Board of Supervisors

Bryan J. Hill, County Executive  
Rachel Flynn, Deputy County Executive  
Tom Biesiadny, Director, Department of Transportation  
Helen Cuervo, District Administrator, VDOT, Northern Virginia  
Susan Shaw, Megaprojects Director, VDOT  
Barbara Byron, Director, Department of Planning and Development  
Randy Bartlett, Director, Department of Public Works and Environmental Services  
Kirk Kincannon, Director, Fairfax County Park Authority



**Attachment 1: Fairfax County Staff Comments on I-495 NEXT Environmental Assessment Reports**

**DPWES Stormwater**

- **SWM Requirements-** The current plan fails to follow the county’s request to meet local stormwater management (SWM) requirements. The project will meet state VSMP regulations as detailed in VDOT IIM-LD-195-12. Additionally, it is the county’s understanding that the project will meet the old grandfathered SWM conditions rather than current requirements.
- **Water Quality-** The project will not meet its on-site water quality requirements. VDOT may ask for an exception from DEQ to meet up to 80% of their phosphorus reduction off site in a nutrient bank outside of Fairfax County. DPWES Stormwater urges VDOT to explore using enhanced outfall stabilization practices to meet the project’s water quality requirements on site. At the August 21, 2020, meeting with VDOT, Virginia Department of Environmental Quality (DEQ), FCDOT, and DPWES staff, VDOT said that the project will incorporate several outfall enhancements into the SWM plan.
- **Water Quantity Control-** Existing 495 lanes largely lack SWM. VDOT’s interpretation of routine maintenance exempts the project’s existing impervious area from the state SWM requirements, so the existing impervious surface will remain largely uncontrolled. The majority of runoff from the new lanes will be piped directly to Scotts Run stream or the Potomac River with no detention, worsening downstream flooding and erosion along Scotts Run. Road flooding impacts both Fairfax County and VDOT infrastructure. Georgetown Pike at Scotts Run Nature Preserve has a history of flooding, most recently in the July 8, 2019, storm. Following the July 8 storm, VDOT replaced roadway and a bridge where Swinks Mill Road crosses Scotts Run. The county is looking at purchasing a repetitive loss property on Swinks Mill Road with FEMA funds. There are also numerous complaints regarding tree loss due to stream erosion downstream of 495. DPWES Stormwater encourages VDOT to pursue underground detention within the ROW to the extent feasible. Underground detention is already proposed in the shoulder along the section of 495 between Lewinsville Road and Old Dominion Drive.
- **Stream and Wetland Impacts-** Based on the current plan, the project will generate about 3,000 linear feet of stream impacts. According to the EA, the plan will also impact 19.8 acres of wetlands. DPWES Stormwater requests VDOT’s design/build team complete permittee-responsible mitigation along Scotts Run, particularly between Lewinsville Road and Old Dominion Drive. This stream section is mostly within VDOT right-of-way and directly adjacent to the project limits. At the August 21, 2020, VDOT agreed to explore on-site stream mitigation.
- **Resource Protection Area (RPA) Impacts-** The EA cites up to 75.5 acres of temporary and permanent impacts to the RPA. Public roads are conditionally exempt from RPA regulation under the Virginia Administrative Code provided that the roadway is designed and constructed in accordance with water quality protection criteria at least as stringent as VDOT requirements. The project will not meet its on-site water quality requirements and require an exemption from DEQ. Given that the project may not meet minimum water quality requirements, DPWES Stormwater requests that the project meet the RPA replanting requirements detailed in Fairfax County Code Chapter 118 Chesapeake Bay Preservation Ordinance and Public Facilities Manual Chapter 12 (12-0316.4) in the Scotts Run stream valley section between Lewinsville Road and Old Dominion Drive.

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*Response to this comment is on the next page*

**27** VDOT presented SWM options to VDEQ to provide a holistic view of impacts to the surrounding properties if the project were to meet County requirements. VDEQ agreed with VDOT’s assessment that the impact to residences and loss of natural habitat were too great to follow more stringent regulations. This documentation has been shared with Fairfax County and the current SWM approach for Project NEXT satisfies meeting the requirements to the maximum extent practicable with the application of both onsite SWM facilities and nutrient credits. This approach was developed through coordination between VDEQ, VDOT and Fairfax County, with Fairfax County staff concurrence for the overall project approach. Using the proposed SWM approach, the conditions would be better following the project than they are today, or than they would be in the future under the No-Build alternative.

**28** Several stormwater management approaches were studied during the preliminary design and environmental documentation phase. VDOT IIM-LD-195.10 applied stormwater requirements to new and reconstructed lanes, shoulders, and shared use paths. VDOT IIM-LD-195.11 applied stormwater requirements to new lanes and shared use paths only. VDOT IIM-LD-195.12 applied stormwater requirements to new lanes, shoulders, and shared use paths.

The current design incorporates VDOT IIM-LD-195.12, which applies stormwater requirements to new lanes, shoulders, and shared use paths. This stormwater management approach excludes applying stormwater requirements to existing impervious areas, including those that will be removed as part of construction and thus will not require stormwater management. The storm system and BMP facilities will be preliminarily designed for capacity to account for the full drainage areas, but when determining peak flow, volume, and velocity targets for water quantity criteria, the Regulated Land Disturbing Activity (RLDA) area will be considered as on-site area and the remaining drainage area will be considered as off-site.

The I-495 NEXT Project will enhance a total of five outfalls along the project corridor. One outfall is required per the permit requirement, the remaining four outfalls have been included as part of the base scope at no cost to the State. In addition, the project will provide stream stabilization along Scotts Run within the Limits of Disturbance for the project.

**29** The proposed drainage features of the 495 project would result in a reduction in water quantity as water leaves the 495 roadway, as well as an improvement in water quality, when compared with conditions that exist today. VDOT continues to work to identify ways to increase this improvement as we move to final design. Given the high traffic volumes in the corridor, and the limited availability of shoulders, there is no plan to locate any underground features within the roadway pavement or shoulders.

**30** Scotts Run is already significantly degraded in this section due run-off from upstream and adjacent commercial and residential development within the watershed. Transurban — as the concessionaire for the project — has agreed to provide a monetary contribution to Fairfax County that would cover 50% of the cost for stream restoration for approximately 3,000 linear feet of the existing stream. Impacts would be mitigated in accordance with NEPA, following federal, state, and Virginia DEQ regulations.



**Attachment 1: Fairfax County Staff Comments on I-495 NEXT Environmental Assessment Reports**

**DPWES Stormwater**

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- **Water Quality-** The project will not meet its on-site water quality requirements. VDOT may ask for an exception from DEQ to meet up to 80% of their phosphorus reduction off site in a nutrient bank outside of Fairfax County. DPWES Stormwater urges VDOT to explore using enhanced outfall stabilization practices to meet the project’s water quality requirements on site. At the August 21, 2020, meeting with VDOT, Virginia Department of Environmental Quality (DEQ), FCDOT, and DPWES staff, VDOT said that the project will incorporate several outfall enhancements into the SWM plan.
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Response to these comments are on the previous page

31

**31** The project as proposed would be designed and constructed to meet water quality protection criteria according to state standards and VDOT’s requirements. Anticipated RPA impacts are detailed in Section 3.2.4 of the I-495 Natural Resources Technical Report. As noted in the comment, the I-495 NEXT project would meet the exemption conditions since it meets minimum water quality requirements. The final design would be optimized to limit encroachment into RPAs, but no additional RPA mitigation is required. However, a tree survey would be completed as part of the project that would help inform the revegetation plan, and which would be used to minimize long term impacts to natural areas. In addition, an additional contribution is being made to Fairfax County by Transurban to contribute to the County’s plan to restore the stretch of Scotts Run that parallels the project corridor but is outside the project’s limit of disturbance.

VDOT will coordinate with Fairfax County prior to replanting vegetation in RPAs, although the project is not obligated to adhere to the requirements included in Fairfax County Code Chapter 118 and Public Facilities Manual Chapter 12 (12-0316.4) since the project is meeting minimum water quality requirements.

Following coordination with FHWA, the following sentence in this response should be revised:

- *Original text: “However, a tree survey would be completed as part of the project that would help inform the revegetation plan, and which would be used to minimize long term impacts to natural areas.”*
- *Replacement text: “The project includes a revegetation program to replace trees lost due to the construction of the project where feasible following construction. In addition, VDOT has committed to providing a tree survey for impacted areas during the design and construction phase of the project, once more detailed plans are available. The tree survey would be used to further document tree impacts and to inform the revegetation plan.”*



- While DPWES Stormwater recognizes the constraints faced by linear projects like the 495 Express Lanes Northern Extension, we also feel that transportation projects, particularly of this magnitude, should strive to minimize impacts to water quality and our local streams.

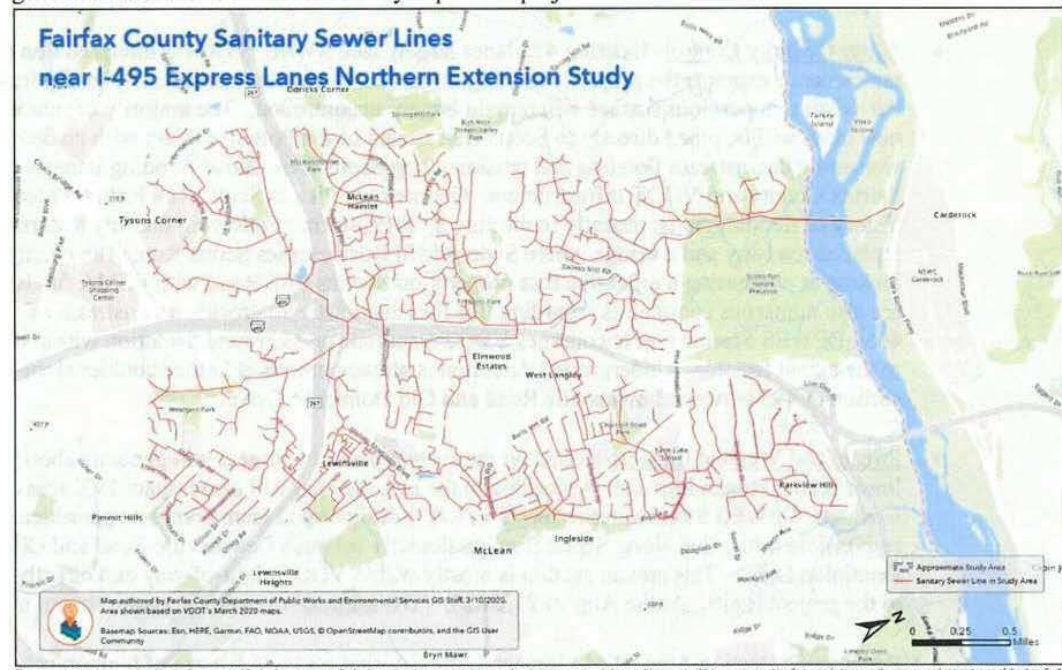
32

- **Revegetation**- When restoring disturbed areas within the 495 project area, DPWES Stormwater requests that VDOT develop and implement a Non-Native Invasive Management Plan (NNIMP), encourages VDOT to restore areas within Waters of the United States corridors with a mix of plants, shrubs, and trees including native plant seed, live stakes, and nursery stock and provide monitoring, invasives treatment, and replanting of restoration areas for a period of two years after construction is complete and restoration vegetation is installed.

33

**DPWES Wastewater**

- Please find a map of Fairfax County wastewater infrastructure both crossing and within the general area of the 495 NEXT Beltway expansion project below



34

- As the project details become more refined, Fairfax County Wastewater Planning and Monitoring Division (WPMD) will need to be given the opportunity (at an early stage) to review the project design plans for potential impacts on wastewater infrastructure (i.e. relocated storm sewer within close proximity (vertical or horizontal) to wastewater infrastructure, significant cut or fill required for road grading that impacts the depth of the existing wastewater pipes, storm water ponds on top of existing wastewater easements, heavy construction equipment on top of shallow existing sewers, etc.).

**Fairfax County Public Schools**

**32** VDOT has completed an extensive study of existing human and natural resources and evaluated opportunities to avoid or minimize impacts to these resources, as documented in the EA and supporting technical reports. VDOT will continue working with the State Historic Preservation Office, US Corps of Engineers, Virginia Department of Environmental Quality, and other agencies during final design and the permitting process to further minimize impacts as the design is refined.

**33** The Project is responsible for meeting all planting and/or replanting requirements required by applicable permits. In addition, following completion of construction, the Project will re-establish vegetation (native grasses and suitable native replacements for trees of 12-inch caliper or greater that were removed) on areas that were disturbed and are not used for any Project elements or facilities. All new or replacement plantings will be maintained through the two-year Project warranty period.

**34** During the final design phase, VDOT would provide draft design plans to the Fairfax County Wastewater Planning and Monitoring Division (WPMD) for their review of potential impacts on wastewater infrastructure. Comments from WPMD will be considered as designs are progressed.



- The only concerns are if sections of Old Dominion or Lewinsville roads area going to be closed during construction. Both of these roads have house stops along them and are routes used by the majority of buses that service the Langley/McLean and Great Falls areas. Also construction/ lane closures at the 495 on and off ramps to Georgetown Pike and the backup this will cause during afternoon rush hour. An area that is already going to have backups due to Cooper Middle being under construction.

35

**Health Department**

- **Socioeconomic and Land Use Technical Report**

- *Measuring economic disparity*  
Table 5-6, p. 19 – “None of the block groups within the Demographic Study Area have a median household income lower than the HHS poverty guideline for the average household size. Therefore, there are no low-income populations in the study area.”

Explanation: The Health Department disagrees with the analysis above, as written, and encourage a more nuanced analysis of economic disparities. Given the high median income of the county, and this part of the county in particular, it is unreasonable to use a nationally derived poverty line as a means by which to measure low income. While it is true there are relatively small numbers of lower income people in this part of the county, using a measure such as 30% or 50% of AMI as a cutoff for low income would be a better approach to counting true economic vulnerability for households in the impacted area.

36

- *Measuring racial disparity*  
There is a minor discrepancy how census tracts are listed. In Table 5-5 on p.17, the census tract with the highest percent of minority population is noted as 4712.02, BG 2, while in subsequent paragraphs in section 5.2.3, it is listed as 4710.02, BG 2.

37

- *Commute mode – Travel to Work*  
The Health Department questions the baseline assumption that because most people commute by car today (Table 6-4, p.23), there is a need to provide more lanes for cars as a means of improving mobility. This assumption is the foundation of analysis in most sections of the entire environmental report, in which the option of No Building versus Build are presented as the only options. A more complete picture of mobility choice would include a comparison of the Build and No Build options to a high speed, high occupancy transit option, which would likely have more environmental benefits over the long term. Such a comparison would also allow for a better analysis of which option best met the “Purpose and Need” of the study, as outlined in section 1-4, p.2:

- Reduce congestion;
- Provide additional travel choices; and
- Improve travel reliability.

The Health Department encourages VDOT to further examine opportunities for regional transit in this corridor.

- **Air Quality Technical Report**

The Health Department encourages tree planting in all available and feasible areas inside the LOD to promote air quality, noise abatement, and screening. If trees are not viable, we encourage

*Response to these comments are on the next page*

- **35** Sound walls: VDOT is committed to working with Transurban and the Design-Build Team to develop a construction program that ensures that sound walls are replaced rapidly after the existing wall is removed.

- Park impacts: VDOT has worked and will continue to work with FCPA and NPS to ensure that the project design and construction minimizes impacts on existing parks.
- Maintenance of traffic: In the final design phase, VDOT will develop a Maintenance of Traffic plan to mitigate impacts during construction. In addition, VDOT will work with key stakeholders, including Fairfax County, to develop a Transportation Management Plan (TMP) to help implement regional measures, such as transit and carpooling programs, to help mitigate impacts during construction.
- Coordination time: VDOT will coordinate with County staff, Supervisor’s offices and residents of impacted communities on traffic and design changes throughout the duration of the project.
- Night construction: VDOT will minimize, to the extent possible, night construction in areas adjacent to residential communities.
- Erosion: As required, VDOT will maintain proper erosion, siltation and stormwater management equipment and facilities during construction.
- Landscaping: The project will provide revegetation in affected areas where revegetation is feasible.
- Disruption: VDOT will work with the Design-Build Team to minimize disruption during construction.
- Bus service: The development of construction phasing and maintenance of traffic plans will take into consideration the need to minimize impacts to bus service during peak hours.
- Roadway striping: VDOT will construct the temporary roadway striping and pavement markings in accordance with the VDOT Road and Bridge specifications, as well as the MUTCD and the Virginia Supplement to the MUTCD, to maintain visibility at night and in inclement weather.

VDOT will continue to work with County staff on these issues.

- **36** The I-495 NEXT analysis for low-income populations followed the FHWA Title VI Program, which is broader than the Title VI statute and encompasses other nondiscrimination statutes and authorities including Section 162(a) of the Federal-Aid Highway Act of 1973, the Age Discrimination Act of 1975, Section 504 of the Rehabilitation Act of 1973 / Americans with Disabilities Act of 1990, Executive Order 13166, and Executive Order 12898 which defines Federal Actions to Address Environmental Justice in Minority and Low-Income Populations (1994). FHWA Order 6640.23A establishes policies and procedures for FHWA to use in complying with Executive Order 12898.

- **37** The I-495 NEXT Socioeconomic and Land Use Technical Report will be revised to correct this discrepancy. The correct reference is 4712.02, BG 2.



- The only concerns are if sections of Old Dominion or Lewinsville roads area going to be closed during construction. Both of these roads have house stops along them and are routes used by the majority of buses that service the Langley/McLean and Great Falls areas. Also construction/ lane closures at the 495 on and off ramps to Georgetown Pike and the backup this will cause during afternoon rush hour. An area that is already going to have backups due to Cooper Middle being under construction.

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*Response to these comments are on the previous page*

**38**

*Comment continued on next page*

**38** The Virginia Department of Rail and Public Transportation is conducting the I-495 American Legion Bridge Transit and TDM Study in coordination with the Maryland Department of Transportation's Maryland Transit Administration (MTA). The recommendations resulting from this study are aimed to work in concert with Virginia's proposed northern extension of the I-495 Express Lanes and Maryland's proposed managed lanes program for the American Legion Bridge, I-495, and I-270. Study information is available at <http://drpt.virginia.gov/transit/major-initiatives/i-495american-legion-bridge-transit-and-tdm-study/>

The Virginia Department of Rail and Public Transportation (DRPT) held a virtual public meeting for the Transit and TDM Study at the Northern Virginia Transportation Authority (NVTA) on November 12, 2020. Additionally, DRPT gave a presentation to the Transportation Committee of the Fairfax County Board of Supervisors on December 8, 2020. The project team held a public meeting to discuss the findings and recommendations of the study on January 12, 2021. The Transit and TDM Study is expected to be completed in winter of 2021.

*[Following coordination with FHWA, the reference to “winter 2021” in the sentence above should be revised to “spring 2021”]*

Because this study is a separate effort, the findings and recommendations from the Transit and TDM Study are not being included in the NEPA document. However, VDOT is reviewing the recommendations of the study to help develop a Transportation Management Plan (TMP) that would help improve traffic operations during construction. Based on the recommendations of the transit and TDM study, the TMP may include the implementation of a new route or new routes between Virginia and Maryland.

As indicated in the November 30, 2020 letter from Secretary Valentine to Chairman McKay, Virginia is committed to providing dedicated, ongoing support for transit services along the I-495 corridor as part of the I-495 NEXT project. This commitment ensures the 495 NEXT project, together with the existing 495 Express Lanes, will provide multimodal solutions to move more people.

In general, extending the 495 Express Lanes creates new opportunities for buses, carpools and other transit use by providing faster and more reliable travel. Additionally, VDOT will work to ensure that corridor improvement funding to support transit improvements be included in a final project agreement with Transurban, and will coordinate closely with Fairfax County on those details. Transit improvements would be based on recommendations supporting bi-state travel from the joint Virginia and Maryland Transit and Transportation Demand Management Study, which is scheduled to be completed in early 2021.



shrubs or other vegetation, as long as they do not present safety hazards, especially for cyclists and pedestrians who are more vulnerable on the roadway.

Given the extended construction period for a project of this nature, the Health Department wishes to emphasize the mitigation strategies for the construction period, proposed by VDEQ, as noted on p.10: *For Fairfax county, VDEQ comments relating to mitigation are7 "...all reasonable precautions should be taken to limit the emissions of VOC and NOx. In addition, the following VDEQ air pollution regulations must be adhered to during the construction of this project: 9 VAC 5-130, Open Burning restrictions8; 9 VAC 5-45, Article 7, Cutback Asphalt restrictions9; and 9 VAC 5-50, Article 1, Fugitive Dust precautions10."*

Specifically, the use of low emission construction vehicles, dust control, and limiting construction activity on high pollution days ("Code Orange" or "Code Red" days) will promote better air quality. Without such considerations, the health of constructions workers and nearby residents/workers/visitors could be negatively impacted. Construction workers are also particularly vulnerable to immediate exposure of fumes from hot asphalt and other construction materials which can be harmful to respiratory health.

• **Noise Technical Report**

The Noise Technical Report provides a lot of detail that is not easily understood. The Health Department encourages FCDOT to carefully review the results, particularly those laid out in Table 7-2, p.54, to fully understand the reasoning and impacts of the recommendations therein.

• **Indirect and Cumulative Effects Technical Report**

The Health Department questions the logic of this summary, from p.47. *"Local roadways that parallel the improved I-495 study area could see traffic volume reductions, as drivers divert from existing surface streets to the improved corridor where they would find better travel conditions. This would result in an indirect benefit to communities from the proposed project."* There is great potential that local roads will continue to experience high traffic due to people avoiding the cost of express lanes as well as traffic in the general travel lanes.

• **Bicycle and Pedestrian Facilities**

The Health Department applauds the design and future construction of additional shared use facilities for pedestrians and cyclists. Where new facilities run parallel to 495, it is imperative that shared use paths be located outside the noise walls. This placement has multiple direct health benefits, including:

- Reduced exposure to vehicle emissions (respiratory and cardiovascular health)
- Reduced exposure to noise (aural and mental health)
- Reduced risk of direct conflict with moving **vehicles** on the highway or flying objects (physical safety and eye health)
- Increased likelihood of facility use by pedestrians and cyclists (cardiovascular and mental health)
- Easier access to the area and regional bicycle network (cardiovascular and mental health)

**Department of Neighborhood and Community Services**

- What did outreach and engagement entail particularly in the CT identified as having a high minority population?

Comment continued from the previous page

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Attachment 1: Page 4 of 8

**39** The I-495 NEXT project will follow all state and federal regulations related to air quality and emissions. All construction activities will be required to adhere to VDEQ's fugitive dust regulation (9 VAC 5-50, Article 1, et seq.), which would have the effect of minimizing all fugitive construction dust, including silica. Mitigation measures to be used during construction could include:

- Use water trucks to minimize dust
- Cover trucks when hauling soil, stone, and debris
- Minimize land disturbance
- Use dust suppressants if environmentally acceptable
- Stabilize or cover stockpiles
- Construct stabilized construction entrances per construction standard specifications
- Regularly sweep all paved areas including public roads
- Stabilize onsite haul roads using stone
- Temporarily stabilize disturbed areas per VDOT erosion and sediment standards

**40** Comment noted.

**41** The traffic analysis presented in the *I-495 Traffic and Transportation Technical Report* provides additional detail on the anticipated shift in traffic from the local roads to I-495 with addition of the Express Lanes, and notes that the project would add additional capacity and reduce the travel times that would otherwise be experienced by drivers on I-495.

**42** Comment noted. VDOT has coordinated with Fairfax County during development of the preliminary design, and the proposed shared use path is consistent with the placement recommended in the letter.

**43** The outreach program developed for the I-495 NEXT project incorporated census data for the census block groups that encompass the study area, characteristics of residences and businesses within the study area, and potential impacts to the community within the LOD. There is one block group with an identified minority population, within the southeast portion of the project. Specific minority outreach was not conducted because there are no residences within this portion of the Limits of Disturbance.



- Were materials available in various languages?
- Were any special considerations or actions taken to engage seniors? Members from the Disability community?
- How was environmental justice determined? The summary just indicates no disproportionately high and adverse effect on minority or low-income populations. More information about the methodology and results used to generate this conclusion would be helpful.
- The summary indicates potential impact on three bat species, wood turtles, and local stream and wood plains. Does this project present an acceptable level of risk and how is that standard established?

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**Department of Transportation**

- Some flyover and interchange ramps along the project have been designed with high elevations to allow for adequate clearances and connections between travel lanes. Alternative concepts to the high elevation ramps should be evaluated and considered for minimizing noise, visual and right-of-way impacts upon nearby residential communities. This is a special concern regarding the ramp from the northbound I-495 Express Lane to George Washington Parkway.
- On Page 7-56, text discusses that operations degrade at Spring Hill/Lewinsville during AM Peak from LOS E in 2045 No Build to LOS F In 2045 Build. This intersection has been looked at by FCDOT/BOS in the recent past, and mitigation of the project impacts may need to be reviewed.
- Fairfax County staff has suggested a grade-separated crossing of Lewinsville Rd in addition to the at-grade connection on the north side of Lewinsville Rd. VDOT responded that the grade separation would provide a connection to a trail system outside the scope of this project and would require a separate feasibility study but will consider to include at-grade crosswalk across Lewinsville Rd to connect the existing shared-use path on the south side. Fairfax County staff previously suggested and continues to recommend routing the proposed SUP under the bridge and connect to the existing path south of the bridge along Lewinsville Rd.
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- We have concerns regarding interim road conditions during construction, particularly maintenance of striping and visible lane markings at nighttime as well as the condition of the pavement once lane markings have been eradicated. Acknowledging that VDOT is still in discussions with the concessionaire, we request that more visible lane markings be installed and that pavement area be milled and overlaid as traffic shifts occur to facilitate construction. Considering the condition of the striping and pavement during the Transform 66 project construction, additional measures by VDOT and the concessionaire should be pursued to ensure that all markings are visible pavement conditions acceptable during all weather scenarios and, particularly, at nighttime.
- The County has presented VDOT with alternative designs for the Tysons East Dulles Connector. Plans for the 495 Express lanes should not preclude the future construction of the Connector.
- There are concerns with transitions at north end of this project and the lack of provisions for continuing northbound into Maryland.
- Page 2-4 of the EA shows the proposed typical section. A gap is shown between the General Purpose Lanes' shoulder and the sound wall. Is that gap to indicate another feature of the roadway or an error in the rendered section?

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*Response to these comments are on the next page*

**44** Most of the materials were provided in English. However, advertisements for public meetings and public hearings have been published in English and Spanish.

**45** Although the October 2020 public hearings were held virtually due to COVID-19, an in-person, by-appointment session was also held at the McLean Community Center. A number of senior citizens attended the in-person hearing as well as the previous two public meetings and two on-line question-and-answer sessions for the project prior to the public hearings.

**46** U.S. DOT Order 5610.2(a) on EJ principles defines a “disproportionately high and adverse impact on low-income and minority populations” to mean an adverse effect predominantly borne by an EJ population or an effect that could be suffered by the EJ population and is appreciably more severe or greater in magnitude than the impact that could be suffered by the non-EJ population. The I-495 NEXT project would take place primarily within the existing right-of-way, no residential or commercial relocations would occur, and the project would not result in new fragmentation or isolation of any communities within the study area. Therefore, the project does not meet the first criteria of resulting in an adverse effect. Where a project results in no effect on minority populations and low-income populations or would result in an effect that does not warrant mitigation, the effect is considered to be not adverse and no further analysis was conducted. This resulted in the conclusion that no disproportionately high or adverse impacts to EJ populations would occur. More detail about the EJ analysis is in the *I-495 NEXT Socioeconomic and Land Use Technical Report*.

**47** There is not a specific threshold of allowed impacts to natural resources. VDOT has coordinated with the state and federal permitting agencies since initiation of the I-495 NEXT project, and will continue to do so through the permitting process. Tree clearing could impact potential suitable summer habitat for the three bat species, with the majority occurring along the edge of existing right-of-way, resulting in minimal reduction in forested cover and quality of forested habitat. Streams and floodplains that contain potential habitat for the wood turtle would be impacted. To reduce potential impacts to threatened and endangered species and their respective habitats, efforts to minimize the construction footprint would be considered. Construction practices would avoid the removal of existing vegetation to the greatest extent possible and include the implementation of best management practices for erosion and sediment control, as well as stormwater management, to reduce potential impacts to adjacent habitats and properties. Additional mitigation would be determined during the permitting and final design phases, as discussed in Section 3.16.2 of the EA.

**48** VDOT evaluated a number of ramp configuration options at interchanges within the project study area. These options were presented at the May 20, 2019 Public Information Meeting. Throughout the preliminary design, VDOT has made adjustments to the project ramps to reduce impacts to the adjacent communities. During final design, VDOT would work with the Design-Build team to continue to enhance the design to minimize impacts to the adjacent communities. VDOT would continue to work collaboratively with Maryland at the project interface.



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**Department of Transportation**

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*Response to these comments are on the previous page*

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*Response to these comments are on the next page*

**49** The degradation noted is attributable to metering of traffic destined for this intersection in the No Build condition, due to the severe congestion in the network, most notably along southbound I-495. The 2045 No Build and Build peak hour turning movement volumes at this intersection are nearly identical, as shown in Exhibits 7-21d and 7-22d in the *I-495 NEXT Traffic and Transportation Technical Report*.

At the time of coordination meetings between VDOT and FCDOT (2019 and 2020), staff noted that intersection improvements were under study by FCDOT, but no preferred alternative had been finalized. The impacted intersections outside of the Limits of Disturbance (LOD) could be improved by VDOT in partnership with Fairfax County through SMARTSCALE or NVTA funding for intersection improvements.

**50** A potential means of routing users from the south end of the proposed shared use path to Tysons could be to use the existing shared use path on the north side of Lewinsville Road, from Timberly Lane to Route 123/Great Falls Street, then the Dolley Madison Boulevard Walkway — recently completed as part of the Tysons Metrorail Station Access Improvement Projects — between Great Falls Street and the McLean Metro Station at Scotts Crossing Road in Tysons.

VDOT coordinated with Fairfax County staff early in the project development process and demonstrated through a preliminary high-level assessment that a direct connection via grade-separated viaduct to Tysons would have constructability issues due to engineering and topography constraints, as well as environmental and right-of-way impacts, and could cost more than \$30M.

**51** The I-495 NEXT project’s proposed shared-use path ends just east of Balls Hill Road, tying into the existing sidewalk that connects Georgetown Pike to Cooper Middle School. An extension further east to Dead Run Drive is beyond the project footprint, and out of the scope of the I-495 NEXT project, although this project does not preclude an extension from being built in the future.

**52** The I-495 NEXT project’s proposed shared-use path would be paved up to Live Oak Drive; Beyond that, grading for a future trail connection to GW Parkway that would extend to the proposed on-ramp from I-495 to GWMP in the 2025 Interim Year design (prior to Maryland’s Managed Lane project being open). This path would then be extended further to the north across the ALMB in the 2045 Design Year, with the assumption that the ALMB will be improved as part of Maryland’s Managed Lane project.



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**53** VDOT will construct the temporary roadway striping and pavement markings, as well as temporary lane shifts, in accordance with the VDOT Road and Bridge specifications, as well as the latest version of the MUTCD and VDOT Supplement to the MUTCD. VDOT will continue to work with County staff on roadway striping, temporary lane shifts, and pavement marking issues.

**54** VDOT has held several meetings with FCDOT staff to coordinate on the Tysons East Dulles Connector project, including discussion of potential conceptual plans for the Connector. At the time the preliminary conceptual design and traffic analysis for this project was conducted, a preferred alternative had not been selected or submitted for inclusion into the regional Constrained Long-Range Plan (CLRP). Therefore, the Connector is not considered a “reasonably foreseeable project” for purpose of the NEPA studies. However, the Ultimate 2045 design configuration would not preclude the eventual Tysons East Dulles Connector project from being implemented.

**55** VDOT Location & Design and Traffic Engineering staff have coordinated extensively with Transurban regarding the merge/diverge distance and taper length at the north end of the project, and will continue to do so. Anticipated Design Exceptions and Design Waivers will be included in the Interchange Justification Report.

**56** The typical section shows one direction having a concrete barrier and another direction having a right-side guardrail barrier. In the case of a concrete barrier, there is typically 4 feet of structural backfill stone behind the concrete barrier; a guardrail barrier requires a larger area to accommodate potential off-road vehicle deflection. Extra space may also be needed in some locations for drainage features. Note that these typical sections are illustrative and not to scale. Design details for shoulder width edges and adjacent noise walls or retaining walls would be further vetted and established during the detailed design phase.



- The EA indicates that access from the I495 southbound express lanes to eastbound Route 267 is facilitated by a C-D road that also provides access to Route 123. It is unclear if the impact of additional Express Lanes traffic on the C-D road has been examined to ensure no degradation in operations.
- Multiple intersections operate under failing conditions in both 2025 and 2045 analysis, particularly those that have deteriorated further compared to the No-Build scenario. These intersections include:
  - 2025 AM
    - Route 123 and Lewinsville Road/ Great Falls Street
  - 2045 AM
    - Route 123 and Lewinsville Road/ Great Falls Street
    - Spring Hill Road and Dulles Toll Road Eastbound Ramps
    - Spring Hill Road and Dulles Toll Road Westbound Ramps
    - Spring Hill Road and Lewinsville Road
  - 2045 PM
    - Route 123 and Lewinsville Road/ Great Falls Street
    - Lewinsville Road and Balls Hill Road
    - Jones Branch Drive and Jones Branch Connector
    - Jones Branch Connector and Express Lanes Ramps
    - Jones Branch Drive and Capital One (West)
 VDOT should further analyze the traffic operations at these impacted intersections and investigate the mitigations to improve the level of service of these intersections.

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**Fairfax County Park Authority**

Here is a summary of FCPA comments that can be found in the various correspondence for Section 4(f) de Minimis Impact, Section (6) for LWCF land, Environmental Assessment, and PH design plans

- Acquisition of Parkland:
  - The United States Department of the Interior (USDOI), Bureau of Outdoor Recreation, approved Project Proposal 51-00053, dated August 17, 1970, for the acquisition of approximately 336 acres of land that was identified as the Burling Tract, with the Land and Water Conservation Fund (LWCF). The Burling Tract was purchased by the Fairfax County Board of Supervisors (BOS), the deed was recorded in Deed Book 3343 at Page 532 on September 4, 1970. The BOS transferred the land to FCPA as recorded in Deed Book 12327 at Page 2170 on October 29, 2001. The Burling Tract includes what is now FCPA Scotts Run Nature Preserve, Tax Map #21-1((1))3, which will be impacted by the VDOT Project. VDOT's Project impacts will likely require a LWCF land conversion process and subject to approval by National Park Service.
- Cultural Resources
  - Park Authority staff recommends any areas with ground disturbance throughout the project corridor that are not previously surveyed, undergo Phase I archaeological survey. If sites are found that are potentially significant to the history of Fairfax County, or potentially eligible for inclusion onto the National Register of Historic Places they should undergo Phase II archaeological testing. If sites are found significant or eligible, avoidance or Phase III data recovery is recommended.
  - Park Authority staff has conducted archival cultural resources review for the above referenced project. The Environmental Assessment report made no mention of the site, 44FX2430, specifically. The report only mentioned that any sites within their area of

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**57** The traffic analysis performed for the project and documented in the *I-495 NEXT Traffic and Transportation Technical Report* considered all movements within the interchange, as well as proposed ramp merge and diverge areas and collector-distributor roads. The concept developed in the Preferred Alternative was configured to minimize existing and future traffic operational issues, including anticipated degradation at the Route 267 / Route 123 interchange if the project was not built. The collector-distributor road configuration in this area would improve operations over the current and future No-Build conditions.

**58** The I-495 NEXT Project would not generally increase the traffic demand at the intersections in question; rather, it would remove upstream bottlenecks that prevent that traffic from getting to downstream destinations under the No-Build and Existing conditions. A number of the impacted intersections that are within the I-495 NEXT Limits of Disturbance (LOD) will be improved as part of this project. The intersections adjacent to / outside the LOD that would continue to have deteriorating operations, even after the I-495 NEXT project is built, could be improved by VDOT in partnership with Fairfax County through VDOT SMARTSCALE or Northern Virginia Transportation Authority funding for intersection improvements or transit operations.

**59** As noted in Section 3.9 of the EA, the Scott's Run Nature Preserve was developed with money from the Land and Water Conservation Fund, and therefore is afforded additional protection under Section 6(f) of the Land and Water Conservation Fund Act of 1965 (Public Law 88-578). The Preserve is operated by the FCPA, and VDOT has coordinated with FCPA since inception of the project. Detail about the potential Section 6(f) impacts, the coordination process, and anticipated mitigation measures is in the *I-495 NEXT Section 4(f) and 6(f) Technical Memorandum*, which is also included as Appendix A of the EA. Updated details on the disposition of the Section 6(f) coordination with FCPA and National Park Service, as well as with the Virginia Department of Conservation and Recreation, since the EA was published will be provided in the Revised EA and Section 4(f) and 6(f) Technical Memo.

**60** Within the Area of Potential Effect (APE), pedestrian surveys and shovel testing were performed in an effort to identify historic archaeological resources. Based on these survey efforts, four archaeological sites were found adjacent to the LOD but would not be impacted by the I-495 NEXT Project. The results of the archaeological survey efforts are summarized further in the *Cultural Resources Survey Report*. The Virginia Department of Historic Resources (VDHR) confirmed on April 7, 2020 that none of the archaeological findings meet eligibility criteria set for in the NRHP and no further work associated with archaeological resources is necessary. This information will be included in the Revised Environmental Assessment.

The *Cultural Resources Survey Report*, appended by reference to the EA, noted that Site 44FX2430 had been identified in a 1999 cultural resources survey, and had been recommended as potentially eligible to the National Register of Historic Places (NRHP). Site 44FX2430 was adjacent to, but not within, the Archaeological APE for the I-495 NEXT project. Since the site is outside of the Archaeological APE, no impacts are anticipated. Therefore, no additional surveys were conducted as part of the I-495 NEXT study. If the LOD shifts during final design so that impacts are possible to Site 44FX2430, additional surveys will be conducted.



impact contained no sites that were eligible, or potentially eligible for inclusion onto the National Register of Historic Places. However, after re-checking the current Virginia Department of Historic Resources (VDHR) status of 44FX2430, the site has NOT been evaluated. Therefore, it is recommended that if the site will be impacted, a Phase II study is necessary in order to determine county significance or eligibility for National Register of Historic Places (NRHP) status. If found significant or eligible, avoidance, or Phase III data recovery is recommended as mitigation.

• **Natural Resources**

All development on Park Authority property must comply with its Policy 201, Natural Resources, and agency-wide Natural Resource Management Plan (NRMP). Of note is Section 7 of the NRMP:

- Avoid adverse impacts to natural areas, mitigate unavoidable impacts from construction and maintenance projects and require restoration and rehabilitation of impacted natural resources.
  - i. Minimize impacts to forests, meadows and other natural areas from human use.
  - ii. Protect significant natural communities and species.
  - iii. Require restoration of impacted natural resources when use of parkland causes damage to them.

If impacts cannot be avoided, staff requests a design that minimizes impacts and a mitigation plan for any losses, which should be coordinated with the Park Authority. This mitigation plan will need to clarify the extent of construction that will occur on Park Authority property as well as the impacts to natural resources.

- Scotts Run Nature Preserve will experience direct impacts of lost parkland, vegetation, habitat and increased storm water discharge, invasive species as well as wildlife impacts. The ecological community impacted by this effort has been classified as Mesic Mixed Hardwood Forest. The area that would be most impacted by this project scored an 11.5 out of 16 in the Non-Native Assessment and Prioritization survey. This categorization makes the area a high priority for active management. It has been treated for invasive plants for several years to maintain ecological integrity.
- Park Authority recommends the rehabilitation for any temporary impacts to natural resources to Park Authority standards and mitigate/compensate for permanent impacts to natural resources on Park Authority managed lands. This requirement shall apply to any natural resource impact (terrestrial or aquatic) that is not regulated under the jurisdiction of any federal or state agency.
- The Park Authority defines permanent impact as any habitat type conversion, for example, forest to grassland, and temporary impact as replacement of the same habitat type or better, for example, grassland to grassland.
- Mitigation/compensation for permanent impacts shall be determined using the Fairfax County Land Development Services 2020 Unit Price Schedule to determine a replacement cost. Forest, woodland, and shrubland habitat types shall be mitigated/compensated for at \$61,049 an acre, and grassland shall be mitigated/compensated for at \$14,520 an acre. Total impacts and mitigation/compensation costs shall be determined upon completion of the site design.
- Due to the proximity to parkland, staff requests the use of only common native species including perennials and seed mixes on this project since non-native species either do not fare as well as natives or are invasive, negatively impacting the environmental health of Park Authority property. The Park Authority requests that the applicant utilize common

*Comment continued on next page*

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*Response to this comment is on the next page*

**61** VDOT will meet the requirements of Section 4(f) and Section 6(f) for potential park impacts associated with the project, which are consistent with the criteria of Policy 201 and NRMP Section 7. Scott's Run Nature Preserve is the only park owned by the Fairfax County Park Authority (FCPA) that is within the LOD, and therefore is anticipated to be impacted. Two other parks —Timberly Park and McLean Hamlet Park—are within the study area, but not within the LOD, as described in Section 3.8.1 of the EA. Based on the preliminary design, approximately 3.21 acres of the Preserve are within the LOD, with approximately 1.20 acres anticipated to be permanent impact and 2.01 acres anticipated to be temporary easements. In addition, since the Preserve was developed with money from the Land and Water Conservation Fund (LWCF), it is also protected under Section 6(f). VDOT and FHWA have coordinated FCPA during the preliminary planning and design phase, and will continue to do so during final design regarding impacts, minimization measures, and mitigation measures as part of the Section 4(f) and Section 6(f) processes. Impacts, coordination efforts, and conclusions are summarized in the EA and detailed in the *Section 4(f) and 6(f) Technical Memorandum*, included in Appendix A of the EA. Both of these documents are being revised and will be circulated publicly in early 2021, to include updated efforts since the EA was completed.

*Following coordination with FHWA, the following sentence in this response should be revised:*

- *Original text:* "Based on the preliminary design, approximately 3.21 acres of the Preserve are within the LOD, with approximately 1.20 acres anticipated to be permanent impact and 2.01 acres anticipated to be temporary easements."
- *Replacement text:* "Based on the preliminary design, approximately 4.11 acres of the Preserve are within the LOD, with approximately 1.10 acres anticipated to be permanent impact and 3.01 acres anticipated to be temporary easements (these updated impact number are in the Revised EA)."

**62** VDOT has completed an extensive study of existing human and natural resources and evaluated opportunities to avoid or minimize impacts to these resources, as documented in the EA and supporting technical reports. VDOT is continuing to coordinate with the National Park Service regarding impacts to the George Washington Memorial Parkway (GWMP) and other parkland, and will continue working with the State Historic Preservation Office, US Corps of Engineers, Virginia Department of Environmental Quality, and other agencies during final design and the permitting process to further minimize impacts as the design is refined. Other elements that will be completed during the final design, such as development of a landscaping plan and a final traffic noise assessment, will provide additional information to the public and local agencies about anticipated impacts and mitigation measures.

Coordination with the National Park Service (NPS) and Virginia Department of Historic Resources (VDHR) regarding potential impacts to the GWMP began in June 2018 with scoping letters, and has included multiple meetings with the NPS and VDHR regarding the GWMP and adjacent parklands. Overall, the NPS expressed their concern regarding tree canopy and herbaceous plant removal, design aesthetics, potential I-495 express lane signage options/locations throughout the GWMP, and the amount of potential permanent and temporary easements needed at the I-495 tie-in location with the GWMP. On April 7, 2020, the VDHR stated that the GWMP is the only historic resource that may be impacted by the proposed project and that Design Option 1 will have the least effect on the GWMP. At VDOT's request, on April 8, 2020, VDHR expanded their position on possible effects to historic properties. VDHR went on to state that Design Option 1 as presented in the February 2020 Visualization Booklet would have the least effect on the GWMP and that if the NPS selects Design Option 1 to move forward with, then the Build Alternative would have a No Adverse Effect on the GWMP. Additional coordination is scheduled for early 2021, and will continue through final design. Details on coordination and decisions made to date will be included in the Revised EA.

- plant species generally native to Fairfax County, including trees, perennials, and seed mixes, to provide the greatest ecosystem benefit.
- o The Park Authority requests the results of any endangered species surveys conducted in preparation to or as part of this project.
  - o Park Authority recommends stabilization of areas within the construction footprint within Scott's Run Nature Preserve using a native seed mix as specified by the FCPA. Once construction is complete, FCPA will rehabilitate these areas to the habitat type. VDOT will compensate FCPA to design, install and maintain these rehabilitated areas for up to three (3) years.
  - o Any impacts that extend beyond the Limits of Disturbance (LOD), including root and branch pruning, must follow Policy 201 for Natural Resources or be mitigated/compensated for.
  - o The FCPA requests the results of any endangered species surveys conducted in preparation to or as part of this project.
  - o Staff has reviewed the Environmental Assessment and has several recommended edits and/or corrections that pertain to description of parkland, habitat classification, migratory bird, bat, and forest dwelling species impacts, and the inclusion of the Potomac Heritage National Scenic Trail within the project limits.

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from previous page*

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The project would include restoration of temporary impacts to park land and a revegetation program to replace trees lost due to the construction of the project where feasible. VDOT has provided a detailed response to the separate letter from the Park Authority indicating a commitment to coordinate on acceptable mitigation for temporary impacts and compensation for permanent impacts.

Mitigation measures proposed for Scott's Run Nature Preserve are summarized in the *Section 4(f) and 6(f) Technical Memorandum* (Appendix A of the EA), and include the following:

- Avoid impacts to the recreational use of the property
- Stabilize areas of land disturbance using a native seed mix as specified by Fairfax County Park Authority
- Minimize potential encroachment by staying within utility easement to the extent possible
- Include connections between the Preserve and the proposed 3.1-mile, 10-foot-wide shared use path, consistent with the County's Trails Plan Map

*Following coordination with FHWA, the following sentence should be added to this response: "Additional mitigation measures developed through ongoing coordination with FCPA will be included in the Revised EA."*





COMMONWEALTH OF VIRGINIA  
**County of Fairfax**  
BOARD OF SUPERVISORS

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**JEFFREY C. MCKAY**  
CHAIRMAN

February 23, 2021

The Honorable Shannon Valentine  
Secretary of Transportation  
P.O. Box 1475  
Richmond, Virginia 23218

Reference: Outstanding Project Issues Associated with the I-495 Northern Extension (I-495 NEXT) Project

Dear Secretary Valentine:

Fairfax County has received VDOT's responses to the County's comments for the I-495 NEXT project's Environmental Assessment (EA) and draft design plans. Since the transmittal of the County's comments, VDOT and the County have been collaborating to address the County's concerns about the project.

On stormwater, the County and VDOT are in the process of developing an agreement to fund stream restoration efforts along Scotts Run. In conjunction with the stream restoration project planned by the County, the additional funds received from the I-495 NEXT concessionaire will provide a more holistic approach to stream restoration that helps promote streambank stabilization, enhanced outfalls, and an overall improvement to Scotts Run. The County looks forward to VDOT's efforts to finalize this agreement that addresses the stormwater concerns previously presented in the County's comments on the EA and any additional opportunities to collaborate with VDOT on methods to promote successful Resource Protection Area (RPA) and vegetation restoration, such as improvements to the soil profile.

The County's previous comments strongly urged the provision of dedicated transit funding towards reducing single-occupancy vehicle ridership, vehicle miles traveled in the area, and encouraging a sustainable transportation system. In a previous letter, you indicated the Commonwealth's willingness to fund such transit efforts in the area. Based on the Department of Rail and Public Transportation study, the County has prepared a cost estimate (in 2021 dollars) to implement this service.

VDOT's responses addressed the various concerns stated by Neighborhood and Community Services, Fairfax County Public Schools, the Health Department, and Department of Public Works and Environmental Services - Wastewater Division. While Fairfax County recognizes the progress that has occurred, it is imperative that VDOT continue to work with staff to address the remaining issues outlined below.

- Traffic Impacts
  - Since December 2020, Maryland has selected a Preferred Alternative that includes two high-occupancy toll lanes in each direction on I-495 similar to the configuration planned with Virginia's I-495 NEXT project. Maryland has also selected a developer consortium to complete the work that includes the American Legion Memorial Bridge (ALMB) to I-270 and plans on submitting a Developer Phase P3 Agreement for review and approval to the Maryland Transportation Authority in March 2021. Considering the most recent progress on Maryland's managed lanes, the County continues to encourage VDOT to coordinate with Maryland to

- minimize the time between the opening of the I-495 NEXT express lanes and Maryland's managed lanes. VDOT should also pursue, to the fullest extent possible, strategies that seek to reduce the travel time on the General Purpose lanes before the opening of the Maryland system.
- VDOT's analysis of the 2025 condition before the completion of the Maryland system of managed lanes identifies improvements to cut-through traffic in the surrounding area and intersections with improved delay. Despite these improvements, it remains important that VDOT identify and implement solutions for the locations where intersection conditions are shown to be degraded including:
    - Georgetown Pike and I-495 NB Ramps,
    - Jones Branch Drive and International Drive,
    - Lewinsville Road and Balls Hill Road, and
    - Spring Hill Road and Dulles Toll Road Ramps (Westbound).
  - Similarly, VDOT should also evaluate context-sensitive solutions for intersections that will experience increased delay in the 2025 and 2045 analysis compared to the No-Build condition in the scenarios after Maryland's managed lanes are complete. These intersections include:
    - Lewinsville Road and Spring Hill Road,
    - Jones Branch Drive and International Drive,
    - Spring Hill Road and Dulles Toll Road Ramps (Eastbound and Westbound),
    - Jones Branch Drive and Jones Branch Connector,
    - Old Meadow Road and Dolley Madison Boulevard,
    - Colshire Drive and Dolley Madison Boulevard,
    - Lewinsville Road/Great Falls Street and Dolley Madison Boulevard, and
    - Georgetown Pike and Dead Run Drive.
  - Bicycle and Pedestrian Infrastructure
    - The trail proposed as part of I-495 NEXT offers significant benefit for non-vehicular regional travel per the County's Comprehensive Plan and public health. Nevertheless, the connection of pedestrian and bicycle facilities as part of this major regional trail and along the secondary streets to Tysons is critical to providing a comprehensive transportation network that meets the needs of this growing community. Currently, this major regional trail will end at Lewinsville Road, but the trail must provide a safe connection for pedestrians and bicyclists to Tysons. To this end, the County requests that VDOT continue to evaluate ways to implement a full shared use path on the Lewinsville Road bridge, replace the existing sidewalk on Lewinsville Road between Balls Hill Road and Dolley Madison Boulevard with a shared use path, and ensure all curb ramps along Lewinsville Road are ADA compliant, meet current shared use path standards, and include pedestrian push buttons at all signalized intersections that do not currently have them.
  - Enhanced Transit
    - The I-495 American Legion Bridge Transit and TDM Study led by Maryland Department of Transportation (MDOT)/ Maryland Transit Administration (MTA) and Virginia Department of Rail and Public Transportation (DRPT) identified transit routes that would promote opportunities for transit ridership between key destinations in Maryland and Virginia. With the Commonwealth's willingness to fund transit efforts, the County requests that full funding be provided for capital and operating costs of one of the Tysons-Montgomery County transit routes identified by the Transit and TDM Study. Current estimates indicate that the initial cost to procure nine vehicles for this route would be \$5.2M with annual operating costs of \$2.2M to run peak hour, bi-directional service with 15-minute headways and off-peak service (figures in 2021 dollars).



The Honorable Shannon Valentine

February 23, 2021

Page 3

Fairfax County appreciates the work that has been undertaken on this project to date and the opportunity to provide comments. We also look forward to working closely with the Commonwealth to develop a mutually beneficial project to County residents and the region.

If you have any questions or need additional information, please contact Martha Coello of the Department of Transportation at [Martha.Coello@fairfaxcounty.gov](mailto:Martha.Coello@fairfaxcounty.gov) or 703-877-5600.

Sincerely,

Jeffrey C. McKay

Chairman

Attachment 1: February 22, 2021 letter from Rob Cary, Chief Deputy Commissioner, to Chairman Jeffrey C. McKay

cc: Members, Fairfax County Board of Supervisors

Bryan J. Hill, County Executive

Rachel Flynn, Deputy County Executive

Tom Biesiadny, Director, Department of Transportation

Rob Cary, Chief Deputy Commissioner, VDOT

Nick Donohue, Deputy Secretary of Transportation

Helen Cuervo, District Administrator, VDOT, Northern Virginia

Susan Shaw, Megaprojects Director, VDOT

Barbara Byron, Director, Department of Planning & Development

Sara Baldwin, Acting Executive Director, Fairfax County Park Authority

Randy Bartlett, Director, Department of Public Works and Environmental Services



# COMMONWEALTH of VIRGINIA

## Office of the Governor

Shannon Valentine  
Secretary of Transportation

March 12, 2021

The Honorable Jeffrey C. McKay  
Chairman, Fairfax County Board of Supervisors  
Fairfax County Government Center  
12000 Government Center Parkway, Suite 530  
Fairfax, VA 22035-0079

Dear Chairman McKay,

Thank you for your letter of February 23rd regarding the 495 Express Lanes Northern Extension project (495 NEXT). I continue to offer my appreciation to you and the Fairfax County Board of Supervisors for your engagement and partnership with the Commonwealth on this essential infrastructure project. Deputy Secretary Nick Donohue, VDOT Chief Deputy Commissioner Rob Cary, and our VDOT team have continued to actively work with our citizens, communities, and Fairfax County staff to optimize this project's design.

As noted in your letter, Maryland has made significant progress in advancing their P3 project on I-495 and I-270, which includes the American Legion Bridge (ALB). Just yesterday, I had a very productive conversation with Maryland Secretary of Transportation Greg Slater regarding the progress of our commercial, technical, and management teams, and our commitment to continue working collaboratively to deliver this project. As we align the work of 495 NEXT with the development of the Capital Beltway Accord, Virginia will continue to pursue innovative solutions to address travel times in the I-495 general purpose lanes.

Recognizing Virginia's commitment to incorporate transit as a critical component of our multimodal system, I am pleased to inform you that the Commonwealth is committed to ensuring that funds to support transit are fully integrated as a part of the 495 NEXT solution. We will make sure that the project provides \$2.2 million per year for transit operations as well as \$5.2 million for the procurement of the initial fleet of vehicles to implement the Tyson's/Montgomery County routes designated in the ongoing DRPT/MTA Transit and Transportation Demand Management Study. Given transit's essential role, I believe the Commonwealth is making an investment in mobility, equity, environmental sustainability, safety, and economic opportunity across the region.

As you may know, VDOT conducted additional analysis and evaluation of each intersection listed in your February 23rd letter. While the supplemental analysis indicated that some intersections were not negatively impacted by 495 NEXT, VDOT remains committed to working

The Honorable Jeffrey C. McKay

March 12, 2021

Page 2

with the County to identify cost-effective measures to address those whose negative performance is the result of this project. Additionally, based on information provided by Fairfax County staff about several intersection studies currently underway, VDOT has agreed to incorporate the County's proposed improvements into the traffic analyses wherever possible.

We certainly support your vision regarding the trail proposed as part of 495 NEXT. Through coordination with County staff, we have determined that by adding a crosswalk with warning lights on Lewinsville Road and adjusting the existing Lewinsville Bridge over I-495, we are able to provide better connections to the existing paths on Lewinsville Road. With diligence, our teams created innovative solutions to address concerns about pedestrian and bicycle connections to Tysons.

The final issue raised by the County is the desire for additional study and community outreach when the ultimate proposed interchange improvements at the Dulles Toll Road and I-495 move forward. Please know the Commonwealth is committed to the highest levels of public involvement and is pleased to accept this request. As part of this commitment, VDOT is currently developing more detailed renderings of the interchange as requested by the County.

We look forward to fulfilling these financial commitments once commercial close on the 495 NEXT project is achieved. Again, I thank you for your continued collaboration to ensure the delivery of this critically important project – with respect and consideration for all of our citizens. Together, I believe we will significantly improve the region's transportation network, unlock one of the most congested highways, and contribute to the quality of life for all of us.

Respectfully,



Shannon Valentine

cc: Members, Fairfax County Board of Supervisors  
Bryan J. Hill, County Executive  
Rachel Flynn, Deputy County Executive  
Tom Biesiadny, Director, Department of Transportation  
Stephen Brich, VDOT Commissioner  
Rob Cary, Chief Deputy Commissioner, VDOT  
Nick Donohue, Deputy Secretary of Transportation  
John Lawson, Deputy Secretary of Transportation  
Helen Cuervo, District Administrator, VDOT, Northern Virginia  
Susan Shaw, Megaprojects Director, VDOT  
Barbara Byron, Director, Department of Planning & Development  
Sara Baldwin, Acting Executive Director, Fairfax County Park Authority  
Randy Bartlett, Director, Department of Public Works and Environmental Services



COMMONWEALTH OF VIRGINIA  
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**JEFFREY C. MCKAY**  
CHAIRMAN

April 13, 2021

The Honorable Shannon Valentine  
Secretary of Transportation  
P.O. Box 1475  
Richmond, Virginia 23218

Reference: Endorsement of the I-495 Northern Extension (I-495 NEXT) Project

Dear Secretary Valentine:

On April 13, 2021, the Fairfax County Board of Supervisors endorsed the I-495 NEXT project. The project will improve mobility throughout the Washington Metropolitan region as it connects to a planned system of managed lanes in Maryland. Since the transmittal of the County's comments in December 2020, Maryland has selected a Preferred Alternative that includes two high-occupancy toll lanes in each direction on I-495 like the configuration planned for Virginia's I-495 NEXT project. Maryland has also selected a developer consortium to complete the predevelopment work that includes the portion of I-495 from the American Legion Memorial Bridge (ALMB) to I-270 and plans on submitting a Developer Phase P3 Agreement for the predevelopment work for review and approval to the Maryland Transportation Authority in the coming months. These are positive and very welcomed steps. However, there is still risk and uncertainty regarding whether, and if so when, Maryland will receive the required approvals to enter into agreements to construct their project.

The continuation of an express lanes system into Maryland over the ALMB remains a critical priority to realize the full anticipated benefit of the I-495 NEXT project. The Board continues to strongly encourage VDOT to coordinate with Maryland to minimize the time between the opening of the I-495 NEXT express lanes and Maryland's managed lanes. We remain concerned about the possibility of project rejection or delay by Maryland, and the impact either would have on roadways in Fairfax County. The Board continues to urge VDOT to address and mitigate the impacts to travel time in the General Purpose lanes in the interim time period.

As outlined below, VDOT and the County have continued their collaboration to address project concerns, particularly those related to transit funding, pedestrian and bicycle infrastructure, intersection improvements, and the visual impact of the I-495 and Dulles Toll Road interchange ramps. In addition to those critical areas, the County also looks forward to working with VDOT on the ongoing implementation issues that will affect the community as the project progresses.

- Enhanced Transit
  - The provision of dedicated transit funding is essential to reducing single-occupancy vehicle ridership, vehicle miles traveled in the area, and encouraging a sustainable transportation system. Since December 2020, the Commonwealth has indicated a willingness to fund transit efforts and the I-495 American Legion Bridge Transit and TDM Study led by Maryland Department of Transportation (MDOT)/ Maryland Transit Administration (MTA) and Virginia Department of Rail and Public Transportation (DRPT) identified transit routes that would promote opportunities for transit ridership between key destinations in Maryland and Virginia. We appreciate the Commonwealth's willingness to fund the capital and operating costs of one



of the Tysons-Montgomery County transit routes identified by the Transit and TDM Study. This funding includes \$5.2M of capital funding towards vehicle procurement and \$2.2M of annual operating costs to run peak hour, bi-directional service with 15-minute headways and off-peak service (figures in 2021 dollars). We would appreciate confirmation that this enhanced transit funding will not be in lieu of other transportation funding the County could expect to receive. An important County goal is to reduce single occupant vehicle (SOV) travel by encouraging more transit use.

- Bicycle and Pedestrian

- The trail proposed as part of I-495 NEXT offers significant benefit for non-vehicular regional travel per the County's Comprehensive Plan and public health. The connection of pedestrian and bicycle facilities as part of this major regional trail and along the secondary streets to Tysons is also critical to providing a comprehensive transportation network that meets the needs of this growing community. To this end, the Board appreciates the Commonwealth's commitment to make a perpendicular connection to the sidewalk at Lewinsville Road rather than meandering the trail to the entrance to Timberly South, to widen the pedestrian path on the Lewinsville Road bridge to allow the continuation of the trail towards Tysons and to add a rectangular rapid flash beacon crossing near Timberly Court and Lewinsville Road. These additional improvements will greatly benefit connections to Tysons and the surrounding community – and reduce SOV travel by encouraging more pedestrian and bicycle travel.

- Traffic Impacts

- VDOT and the County closely examined the intersections that were demonstrating degradation in the 2025 and 2045 ultimate conditions and found that traffic volumes did not increase more than 1% between the No Build and Build conditions. Further discussion also determined that proposed improvements from the County's Comprehensive Plan and several ongoing transportation studies could offer substantial benefit to the intersections that were experiencing delay in the ultimate conditions. To continue to address these locations, Fairfax County and VDOT will partner to implement and fund improvements that will provide relief to intersections impacted by the I-495 NEXT project according to the Comprehensive Plan and future study recommendations.

- Stormwater

- The County and VDOT are in the process of developing an agreement to fund stream restoration efforts along Scotts Run. In conjunction with the stream restoration project planned by the County, the additional funds received by the I-495 NEXT concessionaire will provide a more holistic approach to stream restoration that helps promote streambank stabilization and enhanced outfalls, which provides an overall improvement for Scotts Run. The County looks forward to VDOT's efforts to finalize this agreement that addresses the stormwater concerns previously presented in the County's comments on the Environmental Assessment. The County would appreciate VDOT's collaboration to identify effective ways to integrate our successful findings on revegetation efforts, such as reforestation super clumping plots and soil amendments to promote a healthy soil profile, into the I-495 NEXT vegetation restoration work, as well as explore locations to expand programs like the VDOT Pollinator Habitat Program within or adjacent to the project area.

- Elevated Ramps

Per the County's previous request, VDOT has committed to provide more detailed renderings to allow community members to form a clear and accurate understanding of the visual impact of each phase of the interchange at I-495 and the Dulles Toll Road. We appreciate the Commonwealth's agreement to further study the project and conduct sufficient outreach prior to implementation of future phases of the ramps at the Dulles Toll Road and I-495. The Board appreciates the Commonwealth's agreement to further study the future phases of the project and conduct sufficient outreach prior to implementation of future ramps at the Dulles Toll Road and I-495. The Board remains concerned about the impact of the interchange on adjacent communities in its ultimate configuration and requests that VDOT re-evaluate its design and develop a context-sensitive alternative to minimize the footprint and impacts to the fullest extent possible.

- Implementation

- VDOT has made extensive efforts to coordinate with County staff on project designs, pedestrian/bicycle facilities, and stormwater, among other aspects of the project. These efforts are expected to provide substantial opportunity for input and consideration for the implementation of the I-495 NEXT project. The Board emphasizes that these efforts should continue, and the following considerations be included:
  - Ensuring continued and sufficient outreach for census block groups with over 50% minority population and economically vulnerable households at 30% or 50% Area Median Income.
  - Ensuring that sound walls are replaced rapidly after the existing wall is removed, access for wall installation is designed away from residences to the extent feasible, utility relocation is designed and planned to minimize the impact to communities, and additional outreach should be implemented if noise walls are not replaced according to the specified time in the contract,
  - Continuing efforts to reduce delays in the General Purpose Lanes on I-495 Northbound in the evening peak period,
  - Examining design modifications that will minimize, to the extent feasible, the amount of impervious surface,
  - Minimizing park and open space impacts,
  - Minimizing impacts to heritage properties,
  - Developing an aggressive maintenance of traffic plan for roadway and pedestrian/bicyclist accessibility,
  - Ensuring sufficient time to coordinate traffic and design changes with County staff and Supervisors' offices, as well as the impacted communities,
  - Minimizing night construction in areas adjacent to residential neighborhoods,
  - Considering soil rehabilitation efforts as construction occurs and maintaining proper erosion, siltation and stormwater management equipment and facilities during construction,
  - Developing an effective landscaping and tree replacement plan that also manages the introduction and spread of invasive species,
  - Collaborating with County staff to identify and address any additional impacts to vegetation and stormwater as construction proceeds,
  - Minimizing disruption during construction,
  - Minimizing construction that impacts bus services especially at peak times,

The Honorable Shannon Valentine

April 13, 2021

Page 4

- Ensure design plans are shared with County staff prior to final approval for major design submittal packages, and
- Including proper temporary roadway striping capable of maintaining visibility at night and in inclement weather.

Fairfax County appreciates the work that has been undertaken on this project to date and VDOT's efforts to address project concerns. We look forward to continued collaboration with the Commonwealth as the project moves towards implementation.

If you have any questions or need additional information, please contact Martha Coello of the Department of Transportation at [Martha.Coello@fairfaxcounty.gov](mailto:Martha.Coello@fairfaxcounty.gov) or 703-877-5682 or Tom Biesiadny at (703)877-5663.

Sincerely,



Jeffrey C. McKay  
Chairman

cc: Members, Fairfax County Board of Supervisors

Bryan J. Hill, County Executive

Rachel Flynn, Deputy County Executive

Tom Biesiadny, Director, Department of Transportation

John Lynch, Acting District Administrator, VDOT, Northern Virginia

Susan Shaw, Megaprojects Director, VDOT

Barbara Byron, Director, Department of Planning & Development

Sara Baldwin, Acting Executive Director, Fairfax County Park Authority

Randy Bartlett, Director, Department of Public Works and Environmental Services



Abi Lerner, P.E.  
Virginia Department of Transportation  
4975 Alliance Drive  
Fairfax, VA 22030

Dear Mr. Lerner:

Thank you for requesting feedback from the community on the 495 Express Lanes Northern Extension project. Because of its impact on Georgetown Pike and potential funding impact on other projects, Great Falls Citizens Association would like to submit the following feedback.

Based on experience with existing Express Lanes on I-495, we can't assume that Express Lanes won't make traffic congestion on non-Express Lanes disappear.

With that in mind, GFCA requests that the I-495/Georgetown Pike be built in a manner that both minimizes the backups to Georgetown Pike while also minimizing the impact on Georgetown Pike.

With that in mind, GFCA generally endorses the proposed intersection design although we believe the onramps from Georgetown Pike to north I-495 need to be widened to address traffic backups. With the existing northbound onramp that narrows from three lanes to one lane within 400 feet, traffic routinely backs up into the signalized intersection. The three-lane width of the northbound intersection needs to be extended to address the backups at this intersection.

1

GFCA recommends alternate intersection designs to prevent I-495 from taking the off-ramp directly to the congested on-ramp to get around traffic. Intersection designs including the Single Point Urban Interchange and Diverging Diamond intersection designs to force off-ramp traffic to turn left or right instead of crossing over to the on-ramp.

2

GFCA requests that trails be completely built from Lewinsville Road to the Potomac River using funding allocated for the 495 Express Lanes Northern Extension. If there is a delay building trails, GFCA would like these trails to be built but not at the expense of funding for other trail and intersection projects in Fairfax County. Although an expanded American Legion Bridge isn't being built this year, a trail from Lewinsville Road will provide significant added value by providing connectivity to the Potomac Heritage Trail.

3

Thank you for soliciting community feedback on this project.

Best wishes,  
Scott Knight  
Co-Chair, Transportation Committee

Bill Canis  
President

Tim Thompson  
Co-Chair, Transportation

CC:  
Sen. Barbara Favola  
Del. Kathleen Murphy  
Representative Jennifer Wexton  
Supervisor John Foust

P.O. Box 27 • Great Falls, VA • 22066

**1** One of the I-495 NEXT project goals is to improve traffic operations, such as reducing traffic in the general purpose lanes to an extent that the queue spillback on the northbound on-ramp at this interchange is substantially reduced. At this location, the VDOT Project Team re-evaluated the on-ramp configuration based on meetings with the Great Falls Citizens Association and McLean Citizens Association to address the queuing concern. The proposed ramp configuration from Georgetown Pike to northbound I-495 has been modified since the Design Public Hearing Plans were released in February 2020 to address concerns about queuing on the on-ramp. The proposed revised configuration for the northbound ramp would provide:

- 3 lanes for approximately 350 feet
- 2 lanes for approximately 1,400 feet
- A revised merge configuration at I-495, with a 2-lane on-ramp joining the I-495 general purpose lanes; the second ramp lane would end approximately 300 feet after the merge with I-495.

See attached schematic of the proposed updated configuration for the on-ramp.

Designs will continue to be refined based on public input and cost and impact information.

**2** This comment highlights a unique challenge at this location, and VDOT will continue to work with the design team to optimize the design configuration as the project advances to detailed design. Various alternative intersection/interchange configurations were considered during early concept planning stages. The Georgetown Pike interchange will remain a diamond interchange, but the lanes along Georgetown Pike will be reconfigured within the interchange to improve traffic operations and safety. This configuration was selected to improve traffic operations while minimizing right-of-way impacts. For example, a Single Point Urban Interchange or Diverging Diamond configuration at the Georgetown Pike interchange would likely result in impacts to historic and cultural resources on both sides of I-495.

**3** Funding for the construction of proposed trails along this segment of I-495 as shown in the public hearing plans are part of the project budget and would be constructed as part of the I-495 NEXT Express Lanes. Pairing the trail construction together with the Express Lane construction reduces the cost and timeline of the trail construction. VDOT is coordinating with Maryland on connectivity of the proposed trail between the two states. VDOT plans for the first phase of the trail to be constructed up to Live Oak Drive as part of the I-495 NEXT project, where it can tie in to the Potomac Heritage Trail on the west side of I-495. A future extension of the trail to the north, on the east side of I-495, would be implemented as part of widening of the American Legion Bridge, in coordination with Maryland.





### Resolution from Great Falls Citizens Association

**WHEREAS** The Great Falls community relies on Georgetown Pike for access to schools and employers east and north of the I-495/Georgetown Pike intersection,

**WHEREAS** Evening rush hour traffic on Georgetown Pike frequently backs up as far as two miles from Spring Hill Road to I-495 with delays as long as 40 minutes,

**WHEREAS** Significant volumes of direct off-ramp to on-ramp traffic at the 495/Georgetown Pike interchange contributes to backups on 495 on-ramps,

**WHEREAS** Fairfax County Funding for trails and intersection improvements is limited and,

**WHEREAS** Fairfax County funding for trails along 495 would be drawn from the same accounts as funds for trails elsewhere in the Dranesville District if not funded by the 495 Express Lanes Northern Extension,

**WHEREAS** It is desirable to have bike/pedestrian access between Northern Virginia and the parks in Maryland via the American Legion Bridge,

4

4

Reference comment responses on the previous page. The traffic analysis results for the proposed I-495 NEXT project show that future traffic demand volumes and resulting congestion would be reduced along Georgetown Pike under the Build scenario, compared with existing and No-Build scenarios.

Therefore be it resolved:

1. GFCA endorses the proposed design prepared for the March 12<sup>th</sup>, 2020 meeting with the caveat that the onramp from Georgetown Pike to northbound 495 be widened to allow the full volume of traffic from a full left turn signal cycle.
2. GFCA encourages consideration of Single Point Urban Interchange and Diverging Diamond intersection designs that prevent direct access from off-ramps to on-ramps. If these designs are not used, intersection design should incorporate off-ramp barriers that force off-ramp traffic to turn left or right without allowing off-ramp traffic to access on-ramps,
3. GFCA requests Trails be fully completed alongside 495 from Lewinsville Road to the Potomac Heritage Trail/American Legion Bridge using funds from the current 495 Northern Extension project and not future FCDOT and/or VDOT funds.
4. GFCA requests that VDOT clearly delineate the Limit of Disturbance to include not widening Georgetown Pike west of Helga Place

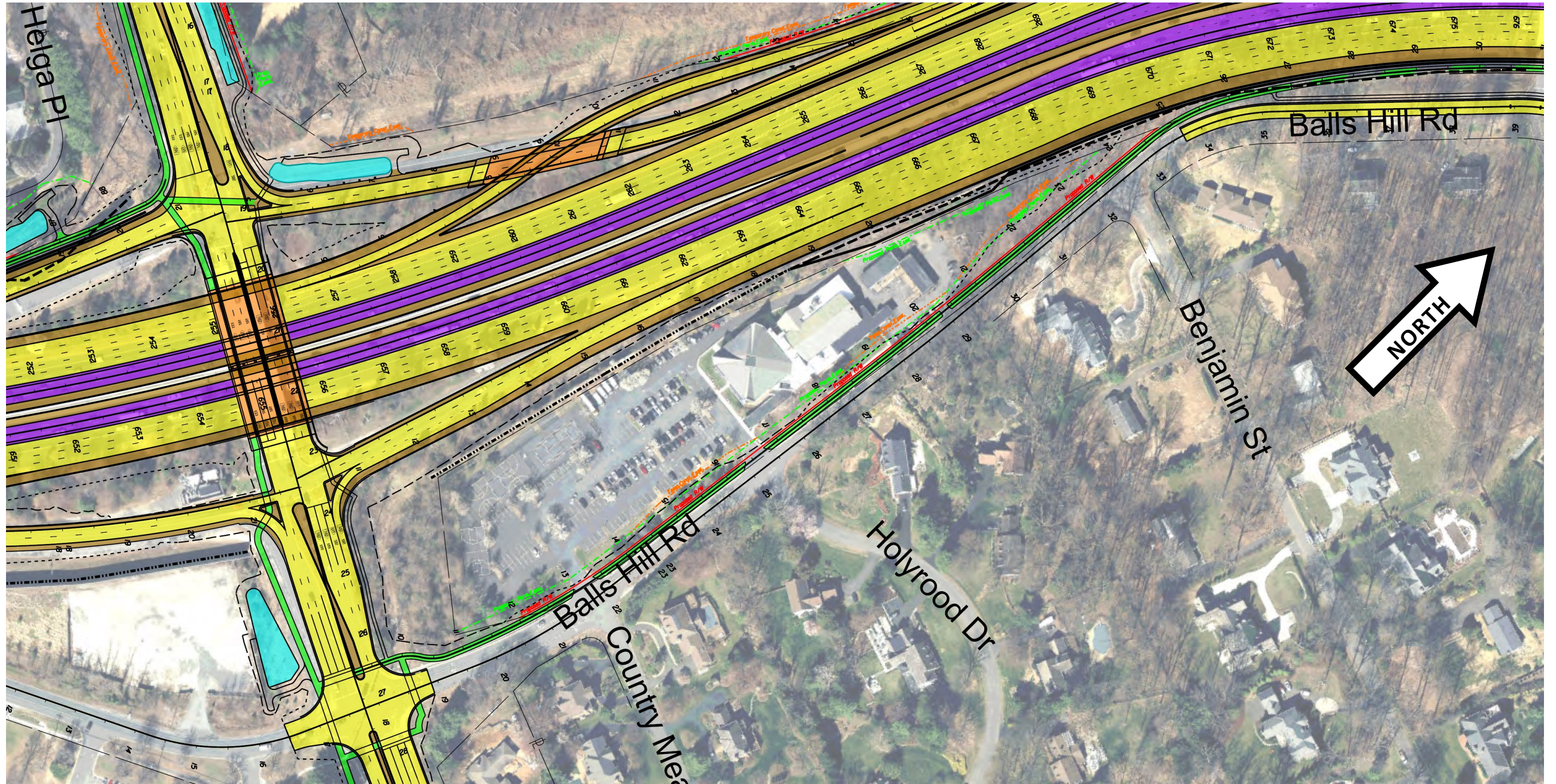
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5

See responses to previous comments for resolution items 1 through 3. For item 4, VDOT anticipates that the footprint of Georgetown Pike will tie back into the existing roadway west of Helga Place. The Limits of Disturbance are shown for a short distance west of Helga Place to accommodate the work needed to tie in to existing conditions, but no changes are anticipated outside of the existing curb lines on Georgetown Pike west of Helga Place. A proposed additional eastbound left turn lane for traffic heading to Linganore Drive would be provided within the area of the existing 16-foot grass median, so no additional widening would be needed, and the project footprint and Limits of Disturbance would remain consistent with the existing footprint west of this intersection.



# Proposed Revised Northbound On-Ramp from Georgetown







November 30, 2020

The Honorable Shannon Valentine  
Secretary of Transportation  
P.O. Box 1475  
Richmond, Virginia 23218

Subject: Comments on I-495 Express Lanes Northern Extension Project Draft Design Plans

Dear Secretary Valentine:

The purpose of this letter is to advise that on November 17, 2020, the Executive Board of the Great Falls Citizens Association (GFCA) unanimously voted to revise and qualify its support for the expansion of the I-495 HOT Lanes, as expressed in a letter previously submitted to the docket on May 3, 2020.

GFCA has represented the interests and residents of the community of Great Falls since the organization's founding more than fifty years ago. As such, we have major concerns especially as it relates to traffic and transportation in our community. In a 2019 Community-wide survey, our members and the community of Great Falls ranked transportation issues involving efforts to reduce cut-through commuter traffic and instituting traffic calming and improving safety on local roads as among their highest ranked concerns.

Because of that background, GFCA is concerned that while proposals to increase the capacity of I-495 may ease congestion, unless that action is fully coordinated with plans to do the same on the Maryland side of the American Legion Bridge (and on the bridge itself), the current situation in our community will be worsened. Moreover, GFCA agrees with statements issued by Dranesville Supervisor John Foust that it would be a "huge mistake" to start the Virginia portion of the project before it is aligned with Maryland's timeframe. GFCA fully concurs with a recent decision of the Fairfax County Board of Supervisors to request the Virginia Department of Transportation (VDOT) to conduct more public-information and comment sessions in order to obtain more involvement and engagement of the public on this important transportation project. We urge you to consider action to delay implementation until additional public input is obtained and the State of Maryland provides a firm commitment to move forward on the I-495 project in concert with the Commonwealth of Virginia.

Further, GFCA requests VDOT to apply its considerable modeling expertise to evaluate the full impact of the combined Route 7 and I-495 construction projects on Route 193 traffic flow/congestion and on backups at the Route 193/I-495 interchange.

For example, we expect the Route 7 widening project to continue to induce more commuter traffic onto Route 193 as a means to avoid delays. We anticipate significant adverse impact on our local roads resulting from more traffic and congestion associated with the I-495 project, to be further aggravated by VDOT's announced plans to replace single-lane bridges in our community with two-lane bridges on Walker and Springvale Roads in Great Falls. These two roads directly connect Route 7 to Georgetown Pike. Accordingly, we request your Department conduct analysis of the impact of the combined Route 7/I-495 projects on traffic volume on Route 193 and on the feeder roads between Route 7 and Route 193 (i.e., Utterback Store, Springvale, Colvin Run, Walker, and Leigh Mill Roads in Great Falls).

Sincerely,



William Canis  
President

cc: Supervisor John Foust  
Sen. Barbara Favola  
Del. Kathleen Murphy  
Helen Cuervo, P.E., VDOT





# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF TRANSPORTATION

4975 Alliance Drive  
Fairfax, Virginia 22030

Stephen C. Brich, P.E.  
Commissioner

March 26, 2021

William Canis  
President, Great Falls Citizens Association  
P.O. Box 27  
Great Falls, VA 22066

RE: Comments on I-495 Express Lanes Northern Extension Project Draft Design Plans

Dear Mr. Canis:

Thank you for your letter from November 30th to Secretary of Transportation Shannon Valentine regarding Virginia's I-495 Northern Extension Express Lanes (NEXT) project. Secretary Valentine asked me to respond, and I am grateful for the opportunity to address the points and questions in your letter. Your letter also has been included in the official Public Comment for the I-495 NEXT project.

Your letter states that the Executive Board of the Greater Falls Citizens Association (GFCA) voted to revise and qualify its support for the I-495 NEXT project due to concerns about traffic impacts to your local roads, and the timing and alignment of Virginia's I-495 NEXT project with Maryland's separate managed lanes project on the American Legion Bridge, and I-495 and I-270 in Maryland. You referenced the need for additional public input and requested that we delay implementation of the I-495 NEXT project until the State of Maryland provides a firm commitment to move forward with their separate managed lanes project.

We recognize that collaboration is essential to a seamless, regional approach to providing managed lanes in the Washington Metropolitan region. The Virginia Department of Transportation (VDOT) continues to work closely with Maryland to ensure that Virginia's I-495 NEXT project and Maryland's I-495 and I-270 Managed Lanes Project are closely coordinated in terms of timing, as well as design and construction compatibility.

Mr. William Canis  
March 26, 2021  
Page 2


In an effort to ensure that the public could provide their input and formal comments into the environmental assessment and design of the I-495 NEXT project, we did extend our formal comment period from its October deadline to December 4, 2020. This extended period provided opportunities for our team to do additional proactive outreach to surrounding communities, while ensuring that all stakeholders had adequate time to provide their input and formal comments.

VDOT understands GFCA's concerns regarding cut-through traffic and safety on local roads. As noted in the Environmental Assessment, our studies show that the I-495 NEXT project will provide benefits to the area's roadway network even prior to the completion of Maryland's separate project. These benefits include moving 7,600 more people per hour through the I-495 corridor due to additional capacity; providing new travel choices such as express lanes and better opportunities to carpool or ride a bus; improving operations on local roads due to a shift in travel demand off of congested local roads; improving safety on residential streets and the general purpose lanes; and decreasing traffic delays on local and neighborhood roads, especially at intersections along Georgetown Pike.

Regarding your concerns about increased traffic during construction of the I-495 NEXT project, VDOT is in the process of developing a Transportation Management Plan (TMP), which includes a construction-related operational analysis that will account for surrounding construction projects including the ones referenced above, which will provide input for future sequencing of construction activities and potential detour routes. This TMP study also will identify transit and transportation demand management strategies that will be employed during construction in an effort to provide options and keep traffic moving during construction. This TMP study will be shared with the public once it is completed.

VDOT remains committed to continuing to work with localities, businesses, and citizens of the Greater Washington Area to listen to and address their feedback on the I-495 NEXT project. The issues identified by the GFCA are important to VDOT and will continue to be an important part of the dialogue as we work together to solve one of the region's most congested transportation links. Through continued collaboration between VDOT and the Maryland Department of Transportation, we are confident that a multimodal transportation solution can be put in place, which will improve travel and make a positive impact on our Commonwealth.

Sincerely,



Robert H. Cary, P.E., L.S.  
Chief Deputy Commissioner, VDOT

cc: The Honorable Shannon Valentine, Virginia Secretary of Transportation  
Stephen C. Brich, P.E., Commissioner, VDOT  
Jennifer Mitchell, Director, Virginia DRPT  
Susan Shaw, P.E., Northern Virginia Megaprojects Director



April 6, 2020

The Greater Reston Chamber of Commerce is a premier leader of economic development in Northern Virginia with a mission to make a positive impact on the growth and prosperity of the region. We write today in strong support of the northern extension of the 495 Express Lanes, the 495 NEXT project.

The 495 NEXT project makes vital improvements to the transportation network that will reduce congestion in the region by providing new travel choices, improve safety by reducing the number of crashes on I-495, and decrease cut-through traffic on local roads by increasing capacity on highway.

The project will also put people to work. The project is estimated to inject more than \$800 million in economic activity into the region and create more than 6,000 jobs. In these uncertain times, shovel ready projects are going to be critical to putting our economy back together.

495 NEXT will also help get the American Legion Bridge project completed. The American Legion Bridge project is the most important transportation project in the region. Once these two projects are completed, the full economic potential of this region can be fulfilled.

In order to maintain Northern Virginia's position as a premier business destination we must continue to invest in developing a 21st century transportation network, we ask that you support the 495 NEXT project.

Sincerely

A handwritten signature in black ink, appearing to read "Charles A. Kapur", written in a cursive style.

Charles A. Kapur  
President & CEO  
Greater Reston Chamber of Commerce

October 12, 2020

The Greater Springfield Chamber of Commerce operates with the goal to develop and promote balanced economic growth and business opportunities in the areas of Springfield, Burke, Lorton, Kingstowne, Franconia, Lorton Station and Fairfax Station.

On behalf of the Chamber's Board of Directors and business community we send this letter to you today to express our full support of the 495 NEXT project. We ask that you help the expansion of the 495 express lanes move forward which will aide in our economic recovery.

The benefits of the 495 NEXT project includes increases in safety, efficiency and inclusivity for all. One of the largest benefits we see this project having is being the precursor for future development and expansion to happen with the Capital Beltway Accord project.

Northern Virginia continues to grow and be a leading and desired business destination and place to live for many across the country and we know that it is due to the infrastructure the county has put in place and we support any efforts to continue that trajectory.

Best,



Kimberly Clarke  
President & CEO  
Greater Springfield Chamber of Commerce



November 9, 2020

Honorable Gregory Slater  
Secretary of Transportation  
State of Maryland  
7201 Corporate Center Drive  
Hanover, MD 21076

Honorable Shannon Valentine  
Secretary of Transportation  
Commonwealth of Virginia  
1111 East Broad Street  
Richmond, VA 23219

**RE: Public Comment for Maryland's I-495 and I-270 Managed Lanes Project, Virginia's 495 NEXT Project, and the joint I-495/American Legion Bridge Transit and TDM Project**

Dear Secretaries Slater and Valentine:

The Greater Washington Partnership (the Partnership) commends your leadership, and that of Governors Hogan and Northam for close coordination to deliver a world-class transportation system for the Capital Region of Baltimore, Washington, and Richmond. The Partnership is a civic alliance of the leading employers in the region who employ more than 250,000 residents and are committed to making the region one of the best places to live, work, and build a business.

We write today to offer public comments supporting your continued forward momentum to deliver upon the promise of the historic Capital Beltway Accord announced in 2019, which requires successful completion, and close coordination, of Maryland's I-495 and I-270 Managed Lanes Project, Virginia's 495 NEXT Project, and your shared efforts on the I-495/American Legion Bridge Transit and TDM Project. These projects, once complete, will alleviate the Capital Region's number one vehicle bottleneck – the American Legion Bridge – and provide more reliable travel for those in cars and new mobility options for millions of residents, employers and visitor to access worksites, educational opportunities and our region's rich cultural assets. The replacement and expansion of this bridge has been a priority for the region's leaders for decades, but a solution has been elusive until now. We cannot let this opportunity pass us by and we support your efforts to get all three projects done as early as possible.

In 2018, the Partnership [released our principles for the development and delivery of a performance-driven toll network](#), which, if implemented, can reduce congestion and single-occupancy vehicle use by creating incentives for residents to divert trips to non-peak periods, increase the number of vehicle occupants, or choose public transportation and carpooling. As a result, congestion on those roadways is reduced, speeds are increased, transit use may rise, and reliability improves for everyone.

We provide the following comments that are cross-cutting for all three projects:

**Toll planning should be coordinated regionally to deliver the benefits of greater mobility, accessibility, and reliability to all users of the transportation system**



We are encouraged by the close coordination occurring between each of your teams, as well as with regional stakeholders, local elected officials, and residents. Strong regional collaboration and policy alignment is necessary across these projects to ensure the roadway tolling policies are complementary and seamless for residents. The close coordination must continue as these projects move forward.

**Prioritize enhanced connectivity for the greatest number of people, not moving the most vehicles or generating the most revenue**

Prioritizing people throughput enhances the efficiency of the roadway's carrying capacity, providing the greatest number of people reliable access to their destination. This is a long-recognized goal for the region's transportation investments, and we recommend that the Preferred Alternatives for these projects be the one that is most effective at moving the most people via multiple modes of transportation.

**Enhance planning and investments to limit adverse impacts for historically marginalized communities, and proactively work to ensure residents of all income levels benefit from the tolling investment, including those without the financial means to afford the tolls**

We must be intentional about limiting adverse impacts for communities of color and low-income areas. The Washington Post's article from October 17, 2020 titled [Maryland Beltway expansion might require moving part of historic African American cemetery](#) raises serious concerns. We cannot support a long-term investment that disproportionately impacts communities where most of the residents are minority or low-income, or Environmental Justice ("EJ") communities. At the same time, we strongly encourage both states to proactively improve mobility and access for EJ communities through these projects by making investments in high-quality public transportation options adjacent to or near the toll corridor, provide incentives that encourage HOV use, and/or provide vouchers or discounts to low-income residents. Additionally, these projects should reduce barriers to using the toll facilities that disproportionately impact those without access to the internet, bank accounts and credit cards—the assets often required to efficiently pay tolls and use the tolling technology. As you advance these critical projects, we also urge you to work to deliver quality jobs and community benefits, and to maximize job opportunities for Capital Region residents providing them access to strong workforce and apprenticeship programs with a proven track record for placing people in careers. Additionally, we support deployment of a robust Minority Business Enterprises (MBEs) and Women Business Enterprises (WBEs) contracting program.

**Clarify how these projects, collectively, will enhance public transportation and other mobility options**

It is critical that these new tolling projects provide residents the freedom to opt out of paying the toll all together through high-quality, cost-effective non-toll trip alternatives (e.g. carpool, vanpool, bus, rail, and cycling). These travel options should be supported by toll revenues. The I-495/American



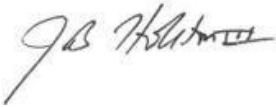
Legion Bridge Transit and TDM Project is expertly tackling this question. We recommend the following measures to mitigate the projects' environmental impacts be included:

- Construct a new multi-use trail option to safely access and traverse the American Legion Bridge;
- Specify the process and expected revenue that would be generated to support transit investments within Maryland and Virginia, and those that connect both jurisdictions, including high-quality commuter bus transit using the HOT managed lanes, Bus Rapid Transit in parallel and nearby arterial roads, and improvements to the MARC system;
- Design the new American Legion Bridge to accommodate future rail transit options and/or conduct a thorough cost-benefit analysis to compare the bridge's design with and without future rail transit options; and,
- Explore innovative concepts to incent meaningful behavioral change, such as matching employer transit benefits to incent different travel patterns.

Specific to Maryland's I-495 and I-270 Managed Lanes Project, we recommend that Alternative 9 and Alternative 13B be further explored using the priorities in this letter to inform the ultimate Preferred Alternative. In addition, we recommend that the state select the Preferred Alternative that will minimize the Project's impact and costs, and ensure the Project is delivered in a reasonable time period. If the EIS schedule gets severely delayed due to public concerns raised about this Project, we encourage the state to consider limiting the scope of the Preferred Alternative and the analysis in the FEIS by only including the Managed Lane Study Corridors' segments included in the state's I-495 & I-270 P3 Program Phase 1 solicitation.

Thank you both for your leadership and continued commitment to collaboration and unity.

Sincerely,



JB Holston  
Chief Executive Officer  
Greater Washington Partnership

CC: Stephen Brich, Commissioner, VDOT  
Jennifer Mitchell, Director, Virginia DRPT  
Kevin Quinn, Administrator, MDOT MTA  
Tim Smith, Administrator, MDOT SHA





# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF TRANSPORTATION

4975 Alliance Drive  
Fairfax, Virginia 22030

Stephen C. Brich, P.E.  
Commissioner

March 26, 2021

JB Holston  
Chief Executive Officer  
Greater Washington Partnership  
1200 17th St NW, Suite 550  
Washington, DC 20036

RE: Public Comment for Maryland's I-495 and I-270 Managed Lanes Project,  
Virginia's I-495 NEXT Project, and the joint I-495/American Legion Bridge  
Transit and TDM Project

Dear Mr. Holston:

Thank you for your letter to Secretary of Transportation Shannon Valentine regarding Virginia's I-495 Northern Extension Express Lanes (NEXT) project, Maryland's I-495 and I-270 Managed Lanes Project, and the joint I-495/American Legion Bridge Transit and Transportation Demand Management (TDM) Study. Secretary Valentine asked me to respond, and I am grateful for the opportunity to address the points and questions in your letter. Your comments also have been included in the official Public Comment for the I-495 NEXT project.

VDOT continues to work closely with Maryland to ensure compatibility among the I-495 NEXT project, Maryland's I-495 and I-270 Managed Lanes Project, and other managed lanes projects in both states. Collaboration is essential to a seamless, regional approach to providing managed lanes in the Washington Metropolitan region. One area of strong coordination is the I-495/American Legion Bridge Transit/TDM Study, which is identifying a range of current and future multimodal solutions that can be implemented to reduce congestion, improve trip reliability and regional connections, and enhance existing and planned multimodal mobility and connectivity.



In congested corridors such as this, it is essential to move the greatest number of people possible. The I-495 NEXT project is designed to result in increased person throughput. Virginia's managed lanes system allows HOV-3+ and transit vehicles to travel for free, encouraging transit use, carpools, and vanpools. With the implementation of the I-495 NEXT project, it is anticipated that 7,600 more people per hour would move through the corridor. The separate joint study between Virginia's Department of Rail and Public Transportation and Maryland Department of Transportation's Maryland Transit Administration is focused on enhancing existing and planned multimodal mobility and connectivity to carry the greatest number of people through the corridor.

Our multimodal transportation network connects Virginians to jobs, education, and health care across the Commonwealth and serves as the platform for Virginia's economy. Ensuring that all Virginians can access economic opportunity underlies our transportation planning efforts. VDOT is committed to the principles of environmental justice and is assessing and documenting the impacts of transportation projects on minority and low-income populations as a normal part of its environmental analysis efforts. The I-495 NEXT project would take place primarily within the existing right-of-way, with no residential or commercial relocations required in Virginia, and the project would not result in new fragmentation or isolation of any communities within the study area. Using methods of identifying Environmental Justice (EJ) populations established by VDOT, FHWA, and EPA, VDOT has determined that there are no concentrated low-income populations within the study area. While one block group with a minority population was identified, it is located outside the area of direct impacts. Based on the lack of anticipated direct impacts and the nature of the potentially affected community, VDOT concluded that the I-495 NEXT project would not result in a disproportionately high or adverse impact to EJ populations. More detail about the EJ analysis can be found in the I-495 NEXT Socioeconomic and Land Use Technical Report.

The I-495 NEXT project would increase traveler options that would positively affect all communities, including EJ travelers. Since the tolled lanes are being added and not converted from existing general-purpose use, the project is anticipated to benefit users of both the Express Lanes and general purpose lanes through reduction in congestion, additional capacity for transit and carpools, and improvement in travel time reliability.

The Commonwealth is committed to providing dedicated, ongoing support for transit services along the corridor as part of the I-495 NEXT project. This commitment ensures that the I-495 NEXT project, together with the existing 495 Express Lanes, provide multimodal solutions to move more people through the corridor. The implementation of new transit service in the corridor would be made possible by the provision of express lanes that allow buses to provide fast and reliable service and to travel on this facility without having to pay for its use, greatly benefitting transit users along the corridor. Virginia's commitment also includes investing funding generated from toll revenues toward the benefit of the users of this corridor, which creates the opportunity for future transit expansion along the corridor.

Mr. JB Holston  
March 26, 2021  
Page 3

VDOT's Civil Rights Division has a long history of ensuring that Disadvantaged Business Enterprise (DBE) and Small, Women- and Minority-owned (SWaM) businesses have a role to play in project development, engineering, construction, and management. The agency's Business Opportunity and Workforce Development Center's DBE Supportive Services Program helps DBE firms become more sustainable, competitive, and successful.

On the I-495 NEXT project, the Design-Build contract requirements stipulate that during performance of the Design-Build work for project, the Design-Builder shall achieve the following goals with respect to small and minority business participation, on-the-job training, and workforce development:

1. Disadvantaged Business Enterprise (DBE) participation equal to fifteen percent (15%) of the Adjusted Contract Value after amounts for the project elements listed below are excluded, plus Small, Women-, and Minority-owned (SWaM) firm participation equal to twenty-five percent (25%) of the Adjusted Contract Value. For clarity, the total DBE/SWaM percentage is forty (40%) of the Adjusted Contract Value, and no funds paid to qualified firms shall be double-counted toward this goal.
2. Providing at least twenty-seven (27) on-the-job trainee positions in accordance with VDOT's trainee and apprenticeship program.

One of the questions you raised dealt with how these projects, collectively, would enhance public transportation and other mobility options. The I-495 NEXT design includes a shared use path (i.e., "multi-use trail") that can connect to a future trail crossing on the American Legion Bridge. The first phase of the I-495 NEXT project would carry the paved path to Live Oak Drive. In the future, the path would be connected to the path on the American Legion Bridge that would be constructed in conjunction with the Maryland Managed Lanes project.


Your letter also specifically inquires about the possibility of designing the American Legion Bridge for future rail transit options. While the American Legion Bridge improvements would be constructed as part of the Maryland Managed Lanes project, I can tell you that support for and expansion of passenger and commuter rail is extremely important to the Commonwealth.

Certainly, commuter behavior plays a significant role in travel patterns and traffic congestion. The Virginia Department of Rail and Public Transportation is conducting an I-495/American Legion Bridge Transit and Transportation Demand Management (TDM) Study in coordination with the Maryland Department of Transportation's Maryland Transit Administration (MTA). The recommendations resulting from this study will include transit enhancements as well as TDM strategies that may be implemented to encourage alternatives to the use of single-occupant vehicles.

Mr. JB Holston  
March 26, 2021  
Page 4

VDOT remains committed to continuing to work with the localities, businesses, and citizens of the Greater Washington Area to listen to and address their feedback on the I-495 NEXT project. The issues identified by the Greater Washington Partnership are important to VDOT and will continue to be an important part of the dialogue as we work together to solve one of the region's most congested transportation links. Through the continued collaboration among the staff of VDOT and the Maryland Department of Transportation, we are confident that a multimodal transportation solution can be put in place, which would improve travel and make a positive impact on our Commonwealth.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert H. Cary". The signature is fluid and cursive, written on a light-colored background.

Robert H. Cary, P.E., L.S.  
Chief Deputy Commissioner, VDOT

cc: The Honorable Shannon Valentine, Virginia Secretary of Transportation  
Stephen C. Brich, P.E., Commissioner, VDOT  
Jennifer Mitchell, Director, Virginia DRPT  
Susan Shaw, P.E., Northern Virginia Megaprojects Director

McGuireWoods LLP  
1750 Tysons Boulevard  
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Tysons, VA 22102-4215  
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Gregory A. Riegler  
Direct: 703.712.5360

McGUIREWOODS

griegler@mcguirewoods.com

October 2, 2020

VDOT Northern Virginia District Office  
Attn: Abi Lerner, P.E.  
4975 Alliance Drive  
Fairfax, VA 22030

VIA ELECTRONIC MAIL

Dear Mr. Lerner:

On behalf of Trinity Group, LLC, the owner of property located at 850 Balls Hill Road, McLean (the "Property"), I am writing to express concerns regarding the adverse impacts on the Property of the 495 Express Lanes Northern Extension (the "project"). The Property is located in the northwest quadrant of the intersection of Balls Hill Road and Georgetown Pike and is developed with the Holy Trinity Church and a private school of general education.

Based on the plans presented by VDOT, the construction of, as well as the easements associated with, the trail along Balls Hill Road will cause a loss of parking spaces, the removal of mature landscaping and will create a situation where the existing building will no longer meet the required front yard setback from Balls Hill Road. As well, the proposed shift in the sound wall in the northern portion of the Property may impact existing parking and site circulation. These impacts are described in more detail below.

Of significant importance to this situation is the fact that the Property is governed by three legislative approvals by the Fairfax County Board of Supervisors: (1) a special exception for the church and school use, (2) a proffer condition amendment associated with the original zoning of the Property, and (3) a parking reduction approval associated with the two uses on the Property. These legislative approvals require that development of the Property be in substantial conformance with an approved development plan, development conditions and proffer commitments.

#### Parking

The provision of adequate parking was an important issue at the time of the public hearings associated with the legislative approvals. Of particular significance is the aforementioned parking reduction that was approved by the Board of Supervisors on February 28, 2012. The conditions of that approval require that 209 parking spaces be provided on-site at all times. Additionally, the church/school is required to monitor parking lot usage and if, at any time, usage exceeds 95% of the parking lot capacity, the school must institute a new parking plan to limit student parking for the remainder of the school year. The school is also required to

*Comment continued on next page*

Almaty | Atlanta | Baltimore | Brussels | Charlotte | Charlottesville | Chicago | Jacksonville | Los Angeles  
New York | Norfolk | Pittsburgh | Raleigh | Richmond | Tysons Corner | Washington, D.C. | Wilmington

**1** With respect to front yard setback, the property is zoned R-1 and the minimum required front yard setback is 40 feet. According to the previously approved plans, the existing building is located 40 feet from the right-of-way (ROW) and any additional ROW acquisition would cause the church to no longer be in compliance with the minimum yard requirement. However, when the noncompliance is the result of ROW acquisition by VDOT, the church can legally remain where it is. Any new construction would have to meet the 40-foot minimum front yard setback.

**2** The proposed trail is not expected to impact the parking spaces in the main parking lot located south of the existing church structure. This parking lot has 244 parking spaces which is more than the required 209 parking spaces.

The proposed trail is anticipated to impact the seven parking spaces adjacent to the sidewalk on the northeast side of the existing church structure. Since there are more than 209 parking spaces in the main parking lot (south of the church structure) the elimination of the seven parking spaces would not place the church in a non-compliance situation with respect to Fairfax County parking requirements. VDOT would work with the church during the right-of-way phase to determine adequate compensation for the church right-of-way and easements needed for the project.



submit a parking utilization study any time such is requested by the Fairfax County Zoning Administrator.

As shown on the project's design plans, the construction of the trail along Balls Hill Road will eliminate the existing parking spaces along the Property's eastern lot line, causing a violation of the parking reduction conditions, the special exception conditions and the layout as shown on the approved special exception plan. Also significant is that the church/school could possibly be required by the County to rework its parking plan and to conduct and submit a parking utilization study.

Comment  
continued  
from  
previous  
page

#### Landscaping

Buffering and screening of the existing parking lot adjacent to Balls Hill Road was also an important issue during the public hearing process for the church/school use. As shown on the design plans, the existing row of mature trees located between the existing sidewalk along Balls Hill Road and the existing parking lot are located with the "Proposed Permanent Easement" and could possibly be removed to facilitate construction of the proposed trail.

3

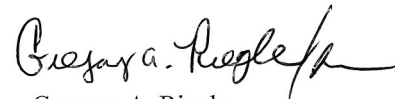
#### Sound Wall

As shown on the design plans, the existing sound wall along the Beltway is proposed is shift eastward in the northern portion of the Property. It is unclear from the plans whether the construction of this wall will impact existing parking and drive aisles in that area of the Property.

4

In conclusion, the property owner has serious concerns about the physical impacts along two of the three property lines of the Property of the 495 Express Lanes Northern Extension project. As described in this letter, the construction of the trail and the sound wall appear to place the Property in a non-conforming status with respect to existing legislative approvals which will then, potentially, hinder the property owner's ability to amend those approvals in the future. We believe that these objective impacts need to be addressed in the proposed design and/or in the valuation of the Property.

Sincerely,



Gregory A. Riegler  
McGuire Woods LLP

**3** To reduce potential impacts to threatened and endangered species and their respective habitats, efforts to minimize the construction footprint would be considered. Construction practices would avoid the removal of existing vegetation to the greatest extent possible. The project includes a revegetation program to replace trees lost due to the construction of the project where feasible following construction. The impacts to existing trees would be taken into consideration during right-of-way negotiations. It is anticipated that the church would be able to plant new trees within its property adjacent to the trail, after the construction of the new trail is completed.

**4** VDOT has refined the design plans to avoid right-of-way impacts along the western edge of the church property as a result of the construction of the new sound wall. Even though additional modifications to the plans may be made during final design, with the current design (post-public hearing plans) VDOT does not anticipate requiring any right-of-way or easements from the church to accommodate the new sound wall. Consequently, it is anticipated that there would not be any impacts to the parking lot as a result of the construction of the new wall.

*The Honorable Terence R. McAuliffe*  
*72<sup>nd</sup> Governor of Virginia*  
*McLean, VA*

October 5, 2020

The Honorable Shannon Valentine  
Office of the Secretary of Transportation  
1111 East Broad Street  
Richmond, Virginia 23219

Dear Secretary Valentine:

I write in support of the 495 NEXT Project. The 495 NEXT Project builds on the public-private transportation successes achieved during my Administration. These include the FredEx project that is extending the 95 Express Lanes ten miles south towards Fredericksburg and the 395 Express Lanes project that extended the 95 Express Lanes for eight miles north to the D.C. line. These projects resulted from a transformed procurement process for public-private transportation projects that I demanded in the wake of the inexcusable waste of more than \$300 million of public funds in the U.S. Route 460 project that was never built because Virginia negotiated a poor contract. Because of the major improvements my Administration made to the P3 procurement process, the 495 NEXT Project will be completed with no public funds, like other projects my Administration negotiated. It will provide additional travel choices and extend the reliable, uninterrupted travel that is currently being realized on the existing 495 and 95 Express Lanes network in Northern Virginia.

As a resident of McLean in a neighborhood near I-495 in Northern Virginia, I am very aware of the great need for the congestion relief that the 495 NEXT Project will provide. As congestion on I-495 develops near the American Legion Bridge, travelers look for alternate routes that disrupt local traffic patterns in the surrounding Virginia neighborhoods. This project will directly benefit neighborhoods in McLean by decreasing the amount of cut-through traffic.

Beyond improving one of the region's most important transportation corridors, the 495 NEXT Project will generate substantial economic development. This project will not only create over six thousand new jobs, but also produce millions in economic activity throughout the construction process. As a privately funded project without taxpayer contributions, 495 NEXT offers meaningful economic stimulus to the Commonwealth.

I urge you to approve the 495 NEXT Project.

Sincerely,  
*Terry McAuliffe*

Terence R. McAuliffe

From: **Veronique Bishop** <[vero.bishop@yahoo.com](mailto:vero.bishop@yahoo.com)>

Date: Wed, Nov 25, 2020 at 9:30 PM

Subject: Re: Meeting to Discuss I-495 NEXT: Langley Oaks HOA

To: Campbell Sarik, Christina <[christina.campbell@vdot.virginia.gov](mailto:christina.campbell@vdot.virginia.gov)>

Cc: Michelle T. Holland <[michelle.holland@vdot.virginia.gov](mailto:michelle.holland@vdot.virginia.gov)>, Abraham Lerner <[abraham.lerner@vdot.virginia.gov](mailto:abraham.lerner@vdot.virginia.gov)>

Dear Christina,

Thank you for scheduling the meeting and sharing presentation materials on the proposed NEXT project which envisages extending the I-495 Express Lanes northward. We will share it with our HOA and other neighbors.

You offered to provide additional information. We would appreciate the following:

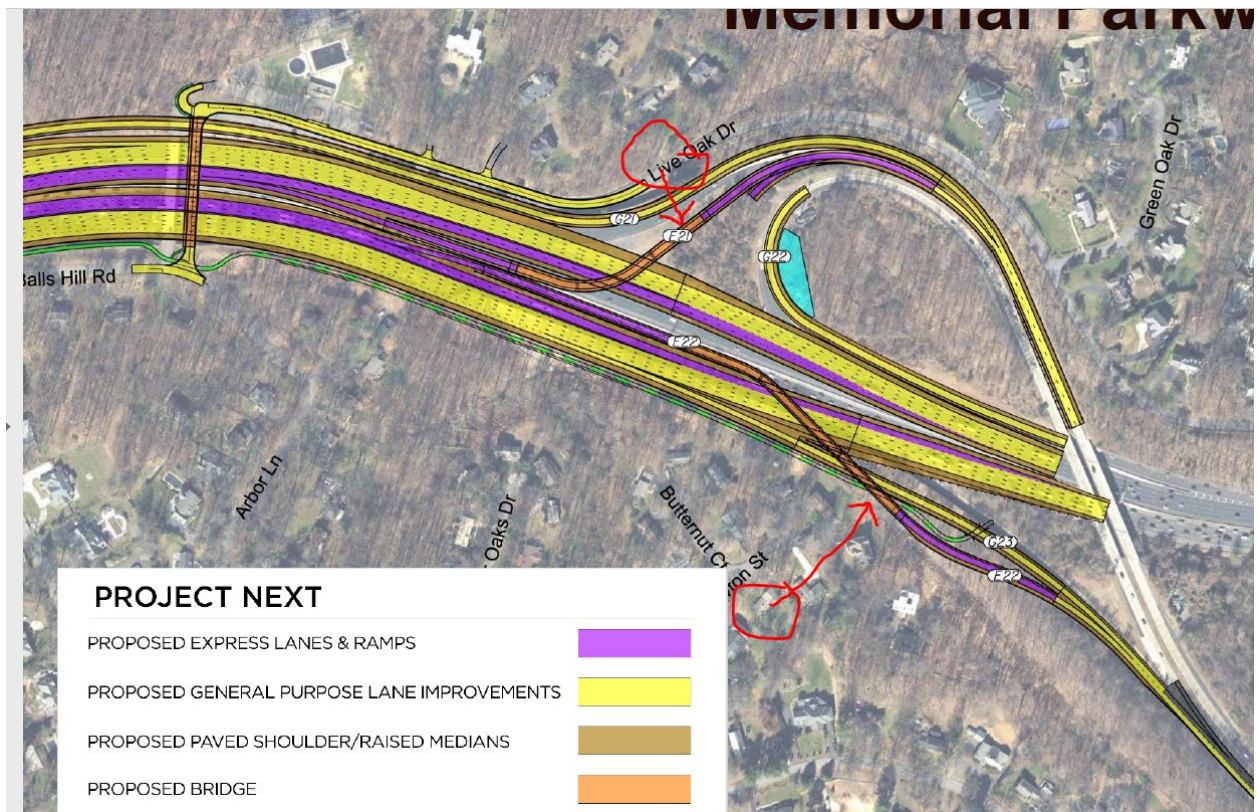
- Can you verify that someone who is familiar with the project including traffic studies and cost-benefit analysis, will be available to answer questions on our virtual meeting?
- Will drivers entering/exiting 495 at Exit 44 Georgetown Pike/193 still have access to the 495 Express Lanes? If not, why not provide access? and If not, please show how Exit 44 traffic would be re-routed. How is this lost time and revenue factored into the cost-benefit analysis?
- Our neighborhood/HOA backs onto GW Parkway, so we're obviously concerned about increased traffic and noise resulting from the proposed NEXT extension and the 3 new bridges/overpasses to connect them. Please indicate the traffic volumes / increasing traffic expected to result from this. We can't understand why people would connect between Express Lanes and GW Pkwy given that alternative routes are faster.

What analysis was used to justify the cost? Does the additional traffic expected to be redirected to GW Parkway justify the cost, including condemning land, building new roads, overpasses and noise walls, and affecting the view amenity of our neighbors on Lawton St. and surrounding streets?

Have the traffic studies analyzed traffic volumes that access the Express Lanes from Rt 193 or from GW Parkway? Are you losing more toll revenue from Rt 193 drivers than from GWP drivers?

Please provide a map showing where the express-lane barriers begin and end.

- Was consideration given to other ways to access the express lanes, other than overpasses? Why not simple ramps like the ones that currently exist between Lewisville Rd. and Old Dominion?
- Height of the new **GW Pkwy overpasses**. How visible will they be from neighborhood streets, e.g. Lawton St. and Live Oak Dr? (see below)



Thanks for organizing, and have a happy and safe Thanksgiving!

Veronique



From: **Veronique Bishop** <[vero.bishop@yahoo.com](mailto:vero.bishop@yahoo.com)>

Date: Mon, Nov 30, 2020 at 5:56 PM

Subject: Re: Meeting to Discuss I-495 NEXT: Langley Oaks HOA

To: Campbell Sarik, Christina <[christina.campbell@vdot.virginia.gov](mailto:christina.campbell@vdot.virginia.gov)>, Abraham Lerner <[abraham.lerner@vdot.virginia.gov](mailto:abraham.lerner@vdot.virginia.gov)>

Cc: Michelle T. Holland <[michelle.holland@vdot.virginia.gov](mailto:michelle.holland@vdot.virginia.gov)>

**Dear Christina,**

Thank you for confirming that Mr. Lerner will present on Wednesday.

**Dear Mr. Lerner,**

Could you kindly provide the additional information requested below in advance of Wednesday's meeting? We have been unable to find it online.

In particular, we are seeking information assessing whether project costs outweigh the benefits, especially for residents and road users in our community, i.e. the **Georgetown Pike / Langley / Great Falls area**.

**Specifically, kindly provide:**

-- Studies of other project alternatives considered

-- Cost-benefit analysis including economic and financial costs, and information on tolls--specifically, which tolls will finance the project?

-- Traffic studies breaking out the impact on Express lanes, Local lanes and local roads.

These should include specific studies of the GW Parkway interchange component and the elimination of the current access ramps, including alternatives considered and expected lifetimes.

Specifically, please identify where in these documents we might find "with-and-without" assessments of the GW Parkway interchange and the elimination of the current access ramps.

Please also indicate where we can find --and how to interpret -- information supporting VDOT's claim that the project will reduce cut-through traffic and congestion on local roads (e.g. Georgetown Pike, Balls Hill Rd., Dead Run Dr, Benjamin St.).

**Please allow me to share concerns that neighbors have shared** and which we would appreciate being addressed in the documents -- which, again, we hope you can provide in advance -- and in our meeting on Wednesday:

**1. The project benefits Express-Lane users at the expense of local users.**

VDOT's presentation indicates that the project will increase travel times on the local lanes of I-495, eliminate the use of the shoulder (fifth lane) by local-lane drivers, and eliminate access to the Express Lanes from Georgetown Pike/Exit 44, reducing travel options for local users.

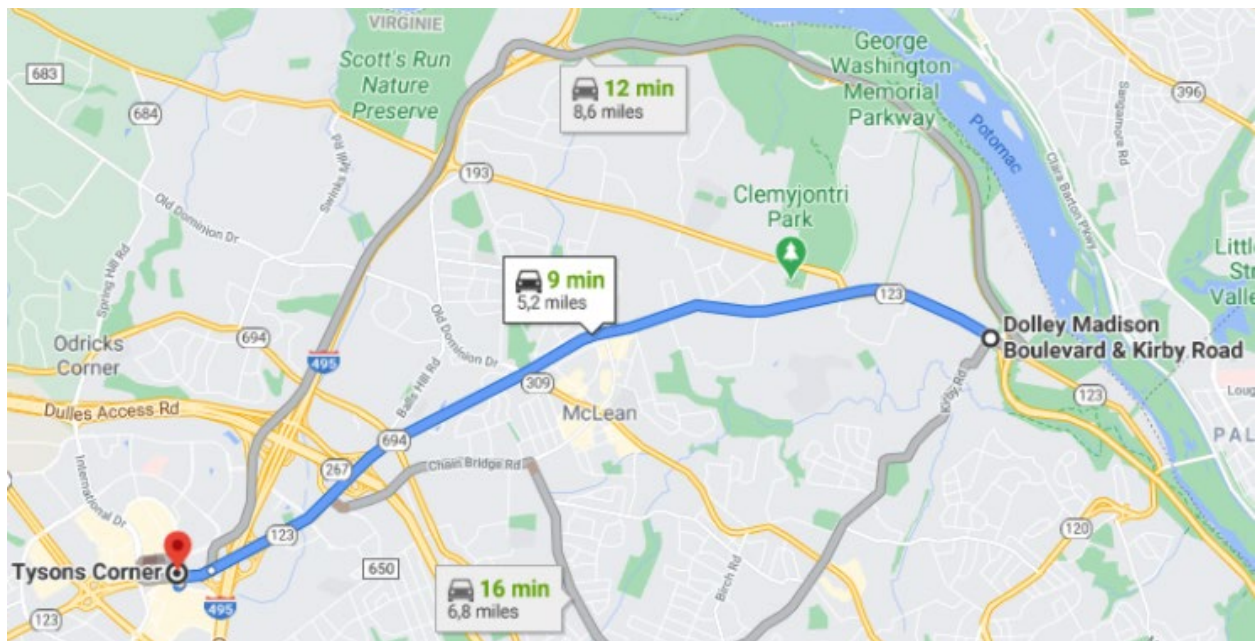
It also indicates that the project will reduce congestion on local roads, but the increased travel times on local lanes suggests the opposite.

2. The major **interchange connecting the Express Lanes to GW Parkway is justified.**

A cursory look at a map shows that **alternate routes take less time** (see Fig below), suggesting that the interchange **cannot be justified at any price**. In addition, the additional infrastructure and ramps take up space that could better be used to widen the bridge approach, and may need to be removed when the AL bridge is replaced.

**Bottom line: the proposed GW Parkway-Express Lanes interchange will aggravate congestion near the American Legion Bridge, at a very high cost and with negligible benefit.**

Other routes from Express Lanes are shorter and faster than GWP via 495.



3. **No alternatives other than "no-build" appear to have been considered.** MCA noted this in their submission to VDOT. **VDOT should at least consider a "no GW Parkway interchange" option.**

4. The **information** provided by VDOT is **insufficient for the public to make informed comments**. VDOT should share the following information:

- cost-benefit analysis of the GW Parkway Interchange including:
  - cost estimates including infrastructure and environmental mitigation costs, and time lost due to additional congestion
  - traffic study showing estimated traffic between the Express Lanes and GW Pkwy, and time/cost savings to drivers on both on the General Purpose lanes and local/cut-through streets.
  - estimated incremental toll revenues from the GW Parkway interchange
  - source and amounts of toll revenues to cover the cost (e.g. Dulles Toll Road proceeds?)

- cost-benefit analysis of eliminating the current access ramps (including traffic studies), showing:
  - lost toll revenues due to drivers from Exit 44 not using Express Lanes
  - increased congestion and time lost due to rerouting these additional cars on the General-purpose lanes or local streets.
  
- traffic studies clearly presenting the impact on the General Use lanes on I-495 and on local traffic.

**5. The presentation materials indicate that the project will *increase*, not decrease, travel times on the local Beltway lanes and nearby streets.**

VDOT should provide information on the traffic studies showing how the increased travel times on the Local lanes will impact local roads near Georgetown Pike/Exit 44.



**McLean Citizens Association Resolution  
Virginia Department of Transportation (VDOT)  
I-495 Express Lanes Northern Extension Environmental Assessment (February  
2020)**

**September 2, 2020**

**Whereas**, in 2011, the Transportation Planning Board for the National Capital Region (TPB) approved a Constrained Long Range Plan (CLRP) that included the widening of the Capital Beltway (I-495 or Beltway) to include a system of high-occupancy toll lanes (HOT Lanes or Express Lanes) from the American Legion Memorial (ALM) Bridge to the Backlick Road underpass; and

**Whereas**, in 2012, the Virginia Department of Transportation (VDOT), in conjunction with Transurban, a private company, completed the widening of I-495, including construction of HOT Lanes in its center, from the I-95/I-495/I-395 interchange in Springfield to a point between the I-495 interchange with the Dulles Toll Road (Route 267) and Old Dominion Drive, approximately three miles south of the ALM Bridge over the Potomac River, but continued its plans to extend the HOT Lanes to the vicinity of the ALM Bridge; and

**Whereas**, in April 2018, the Virginia Commonwealth Transportation Board approved funding to conduct an environmental study of a plan to extend the I-495 Express Lanes from their present northern terminus to the vicinity of the ALM Bridge and the Maryland state line; and

**Whereas**, this I-495 Express Lanes Northern Extension (495 NEXT) study was to be developed as an independent, stand-alone project that would be coordinated with a study being developed by the Maryland Department of Transportation (MDOT), known as the I-495 and I-270 Managed Lanes Study, to examine reduction of roadway congestion from the George Washington Memorial Parkway (GW Parkway), including improvements to the ALM Bridge, to west of MD 5, and along I-270 from I-495 to north of I-370; and

**Whereas**, in January 2019, Virginia Governor Ralph Northam announced that the Commonwealth of Virginia had signed a Project Development Agreement with Transurban, which operates the existing I-495 Express Lanes, to extend the Express Lanes to the ALM Bridge; and

**Whereas**, in February 2020, VDOT and the Federal Highway Administration (FHWA), as the lead federal agency, issued for public review and comment an Environmental Assessment (EA), prepared pursuant to the National Environmental Policy Act of 1969, along with proposed design plans and technical reports, for the 495 NEXT Project, and the VDOT website advises that the comment period for the EA remains open; and



**Whereas**, in March 2020, the TPB approved the inclusion of the 495 NEXT Project in the 2021 to 2024 Transportation Improvement Plan (TIP), which makes the project eligible for federal funding; and

**Whereas**, the EA examines conditions under only a Build Alternative and a No Build Alternative, and

**Whereas**, the Build Alternative would consist of: extending the existing four I-495 Express Lanes from their current terminus; providing new access ramps connecting the Dulles Toll Road and the I-495 Express lanes; adding new Express Lane access to and from the GW Parkway; rebuilding the overpasses for Live Oak Drive, Georgetown Pike, Old Dominion Drive, and I-495 North over the Dulles Toll Road; and adding an approximately 3.1-mile, 10-foot-wide shared-use path for pedestrians and bicyclists starting near the south end of the project corridor at Timberly Lane near Lewinsville Road and continuing generally north along I-495 and the west side of Balls Hill Road to the GW Parkway interchange; and

**Whereas**, the No Build Alternative would retain the existing lane configuration through the study area except for modifications to the roadway network that have been approved for implementation by 2045, as identified in the most recent (October 2018) CLRP approved by the TPB, and the No Build Alternative assumes that the planned transportation projects within the study area that are included in the CLRP would be in place, including the expansion of capacity at both the ALM Bridge and the stretch of I-495 from the Bridge to I-270 pursuant to Maryland's Managed Lanes Study; and

**Whereas**, the EA contains a detailed description of the purposes of the 495 NEXT Project and concludes that the Build Alternative would: (1) reduce congestion by optimizing traffic volumes and travel demand, improving traffic operations, and increasing the number of persons moved; (2) provide additional traffic choices by adding Express Lanes as an alternative travel option for high occupancy vehicles and van pools or those wishing to pay a toll, increasing the potential for future regional bus service through dedicated or managed lanes that would allow buses to travel more efficiently, and adding a shared-use path to provide a bicycle and pedestrian option for local travelers; and (3) improve travel time reliability, because, although congestion would still exist during peak hours in the general purpose lanes, overall travel speeds would increase and travel times would decrease compared to the No Build Alternative; and

**Whereas**, the EA asserts that, in contrast, under the No Build Alternative (post-MD Managed Lanes project implementation), the existing traffic congestion on I-495 near the ALM Bridge would be exacerbated given the substantial growth in population and employment projected for the area, which would additionally strain highway capacity; and

**Whereas**, on July 10, 2020, the FHWA and the MDOT issued a draft environmental impact statement (DEIS) for the Managed Lanes Study, which, after considering a number of alternatives, retained for further consideration a No Build Alternative and several Build Alternatives, all of which would involve replacement of the ALM Bridge and expansion of I-495 from the GW Parkway to I-270 by adding two lanes in each direction that would be either HOT Lanes or Express Toll Lanes (ETL); and

**Whereas**, the McLean Citizens Association has long been aware that traffic backs up each weekday on the inner loop of I-495 between Tysons and the ALM Bridge during the afternoon and evening rush

hours, causing many commuters to bypass this backup by cutting through local McLean residential streets and intersections to access I-495 north toward Maryland from the Georgetown Pike onramp, which creates significant congestion on local roads in the vicinity of that on-ramp and access and safety problems for residents of those neighborhoods; and

**Whereas**, the McLean Citizens Association has recognized that a long-term solution to this congestion and cut-through traffic problem is likely to come only with elimination of the bottleneck at the ALM Bridge, has consistently been on record as supporting additional capacity at the ALM Bridge and on connecting roadways, and has expressed its position in resolutions dated February 2, 2011, and January 6, 2016; and

**Whereas**, in light of Maryland's intention to implement its Managed Lanes Study as described above, the 495 NEXT Project would provide a crucial link between the existing expanded stretch of I-495 in Virginia ending near the Dulles Toll Road and the proposed expansion of I-495 by Maryland extending to the GW Parkway, and the resulting integrated, expanded highway is predicted to reduce the cut-through traffic problem; and

**Whereas**, the EA and its accompanying Traffic and Transportation Technical Report contain projections concerning the potential impact of the 495 NEXT Project on traffic in year 2025 (including a scenario in which the expansion of the ALM Bridge and I-495 from the Bridge to I-270 has not yet occurred) and in 2045, which show that results will be mixed, but that the project will improve certain transportation times on I-495 between I-267 and the ALM Bridge by 2025 and will bring about more consistent and significant improvements in transportation times in this section of I-495 by 2045; and

**Whereas**, even though the 495 NEXT Project is anticipated to be completed several years before Maryland completes its improvements to the ALM Bridge and portion of I-495 between the GW Parkway and I-270, based on its traffic study, VDOT predicts that, even in the absence of any action by Maryland, the Build Alternative will reduce cut-through traffic on local roads by increasing the person-carrying capacity of I-495 and improving trip time and travel reliability on I-495, thereby reducing the incentive to use local roads; and

**Whereas**, it appears that the 495 NEXT Project would also produce other independent benefits, such as improved pedestrian and bicycle paths that could be connected to future paths included in Maryland's improvements, improved connections with Route 267, and other ramp improvements; and

**Whereas**, in preparing the EA, VDOT with the FHWA consulted with a number of local, state, and federal agencies, whose comments about environmental impacts and mitigation are included in Appendix B to the EA, and, in consideration of these comments, the EA assessed and documented the potential environmental impacts of the Build Alternative on a number of resources; and

**Whereas**, the Environmental Protection Agency (EPA) recommended in a July 23, 2018 email summarized on page 4-5 of the EA that VDOT should explain why only one build alternative is being evaluated, but the EA does not provide such an explanation for why it is considering only one build alternative; and

**Whereas**, the EA, at pages 3-54 to 3-55, states that an estimated 118 acres of trees that provide visual and sound barriers as well as stormwater benefits are scheduled to be cleared to make way for the

widening of the roadway, ramps and interchange re-configurations, noise walls, stormwater management facilities, and other structures; and

**Whereas**, the EA describes potential impacts to public parkland, the GW Parkway, the Potomac Heritage National Scenic Trail, Scott's Run Nature Preserve, and adjacent neighborhoods; and

**Whereas**, the Virginia Department of Conservation and Recreation (DCR) recommended to VDOT, as summarized on page 4-5 of the EA, that VDOT undertake an inventory for the resources within areas proposed for disturbance, including stormwater management ponds and equipment staging areas to obtain survey results that can more accurately evaluate potential impacts to natural heritage resources and offer specific protection recommendations for minimizing impacts to these resources; and

**Whereas**, the EA states that there is no stormwater management plan, but we note that there is one badly eroded drainage channel adjacent to the GW Parkway ramps and the Outer Beltway approaching the ALM Bridge that drains directly into the Potomac River, and properties in the vicinity of Live Oak Drive and the Langley Swim Club have unresolved drainage issues; and

**Whereas**, the EA states that the Potomac River, within the jurisdiction of Maryland, is not within the Limits of Disturbance (LOD) and is not expected to be impacted, but the already degraded Dead Run and Scott's Run, which are within the study area, drain directly into the Potomac, and

**Whereas**, under present conditions, traffic from Georgetown Pike can enter the existing southbound Express Lanes by entering the general purpose lanes and merging across several lanes of traffic over the course of about 0.8 mile to the current beginning of the southbound Express Lanes, but under the 495 NEXT Project, there will be no means of entering the extended southbound Express Lanes for traffic entering the Beltway at Georgetown Pike, so that such traffic will have no opportunity to enter the southbound Express Lanes until ramps in Tysons at Scott's Crossing Road or Westpark Drive; and

**Whereas**, the proposed new Georgetown Pike bridge over the Beltway is planned to have a pedestrian walkway only on the south side, not on both sides as was the case with all the other bridges that were rebuilt over the Beltway as part of the past addition of I-495 Express Lanes from I-95 at Springfield to the Dulles Toll Road, and this will require those living on the north side of Georgetown Pike and east of the Beltway to cross and then re-cross Georgetown Pike to reach Scott's Run Preserve, on the north side of Georgetown Pike, west of the Beltway;

**Now, therefore, be it resolved**, that the McLean Citizens Association supports implementation of VDOT's 495 NEXT Project for the reasons indicated above, conditioned on VDOT's addressing the environmental impacts of constructing the project discussed above and in accordance with the following Resolved clauses of this resolution.

**Be it further resolved**, that the McLean Citizens Association believes that residents have a right to, and should be provided with, information on any construction activity that impacts private and public property in the McLean area, including timely and advance notification of all significant activities associated with the project, including advance notice of the location of and impact on temporary easements or staging areas.

1

**Be it further resolved**, that the McLean Citizens Association urges that VDOT respond to the EPA comment and explain why only one build alternative is being evaluated.

2

**1** Affected property owners will be notified individually during the right-of-way acquisition phase. In addition, the design-build contractor will coordinate with VDOT to provide regular updates to the public regarding anticipated construction and impacts.

**2** The I-495 NEXT Environmental Assessment (EA) identified one build alternative which is acceptable under FHWA's Technical Advisory T 6640.8A *Guidance for Preparing and Processing Environmental and Section 4(f) Documents* (FHWA, 1987). Under Technical Advisory T6640.8A, it states that "An EA does not need to evaluate in detail all reasonable alternatives for the project and may be prepared for one or more build alternatives." The I-495 NEXT Build Alternative was identified as the only reasonable alternative to advance based on the Purpose and Need for the study. This single build alternative leaves ample flexibility for different designs to be considered when the project advances to permitting and more detailed phases of design following an FHWA NEPA decision.



**Be it further resolved,** that the McLean Citizens Association is concerned about the loss of 118 acres of trees, as reported in the EA, and the fact that VDOT has not proposed any mitigation measures to offset this tree loss, and urges VDOT to commit to the following, including making related information available to the public: (1) undertaking a tree survey as to the numbers and species of trees to be removed, (2) minimizing impacts to mature and healthy trees, if at all possible, (3) identifying mitigation efforts it will undertake to offset the environmental loss resulting from this tree removal, including replanting of suitable native species and generally comparable numbers of trees within the areas affected by the project, and (4) implementing and monitoring a replanting program to ensure that these trees are healthy and growing in years going forward.

3

**Be it further resolved,** that since the greatest impact of the project will fall on Scott's Run Nature Preserve and GW Parkway, every effort should be made to minimize the footprint of the facility and to avoid temporary use of parkland during construction.

4

**Be it further resolved,** that the McLean Citizens Association requests that VDOT undertake a resource inventory along the Potomac Heritage National Scenic Trail and along the steep bluff on the eastern side of I-495 by the river in order to adequately estimate the impact of the project on these resources.

5

**Be it further resolved,** that the McLean Citizens Association urges VDOT and Transurban to use already paved areas for temporary construction easements like the three acres at the intersection of Georgetown Pike and I-495 instead of impacting parkland to the extent feasible.

6

**Be it further resolved,** that in order to mitigate the overall impact on natural resources, the McLean Citizens Association requests that the Design/Build contract include a provision requiring (1) that native species including grass seed mixtures be used in mitigation and (2) that the public be provided with a proposed landscaping plan during the mitigation phase, and opportunity to comment on such plan.

7

**Be it further resolved,** that surveys of the natural resources and diverse ecology within areas of Scott's Run Nature Preserve proposed for disturbance, including Potomac Gorge rare and endangered species, be conducted as recommended by DCR, and made available to the public as soon as possible and before finalization of contracts, so that potential impacts can be more accurately evaluated.

8

**Be it further resolved,** that, to attempt to mitigate the impact on Scott's Run Nature Preserve, the McLean Citizens Association urges VDOT to commit to making a cash contribution to the Fairfax County Park Authority (FCPA) for removal of invasive plants and for the planting of new native plants in the Preserve.

9

**Be it further resolved,** that the McLean Citizens Association requests that VDOT and Transurban adopt and implement a comprehensive stormwater management plan for the entire study area and including adjacent private properties to mitigate the impact of stormwater runoff from the completed project on those properties, the adjacent streams, and the Potomac River, and such plan should consider extreme weather events that could have an adverse impact on those resources.

10

**Be it further resolved,** that the McLean Citizens Association urges VDOT to carefully consider the financial impacts and uncertainties related to increased use of telework and reduced commuting traffic patterns resulting from the Covid-19 pandemic prior to signing a contract for the project or beginning construction-related activities, such as utility relocation.

11

**3** A tree survey will be completed as part of the final design process. Minimization measures have been incorporated into the preliminary design to reduce the affected footprint. A landscaping plan will be completed as part of final design, and further mitigation measures will be considered during that phase. Native species will be used where feasible.

**4** Mitigation measures proposed for Scott's Run Nature Preserve are summarized in Appendix A of the Environmental Assessment (EA), and include the following:

- Avoid impacts to the recreational use of the property
- Stabilize areas of land disturbance using a native seed mix as specified by Fairfax County Park Authority
- Minimize potential encroachment by staying within utility easement to the extent possible
- Include connections between the Preserve and the proposed 3.1-mile, 10-foot-wide shared use path, consistent with the County's Trails Plan Map

**5** A resource inventory was completed within the Limits of Disturbance (LOD). Although the Potomac Heritage Trail is within the LOD, the project is not anticipated to permanently impact this resource. The Potomac Heritage Trail and Live Oak Trail primarily follow the same alignments along Live Oak Drive. The on-street portion would be realigned with the roadway, but both the road and trail would remain open during construction. The off-street portion under the American Legion Memorial Bridge would be maintained during construction.

**6** Preliminary temporary construction easements were designed to minimize impacts to parkland, and the design-build contractor will look for further ways minimize impact during the final design process.

**7** A landscaping plan will be completed as part of final design. Native species will be used where feasible. Within the Scott's Run Nature Preserve, a native seed mix will be used as specified by Fairfax County Park Authority.

**8** A resource inventory was completed within the Limits of Disturbance (LOD). No impacts within the LOD are anticipated. Surveys were conducted for northern long-eared bat, little brown bat, tri-colored bat, and wood turtle. The Project Team conducted research and coordination with U.S. Fish and Wildlife Service, Virginia Department of Game and Inland Fisheries, National Marine Fisheries Service, and Virginia Department of Conservation and Recreation. If the project footprint changes during final design, additional surveys will be completed.

**9** Mitigation measures were developed through agency coordination as part of the Section 4(f) and Section 6(f) processes. See Response #4 for detail on the proposed mitigation measures at the Preserve.

**10** I-495 NEXT is required to comply with the Virginia Stormwater Management Act. In accordance with the Virginia Administrative Code (9VAC25-870), stormwater management infrastructure will be provided to address runoff from new impervious surfaces. Water quality best management practices (BMP) will mitigate the nutrient impact from the new impervious surfaces. Water quantity will be addressed through the implementation of stormwater management facilities, adequate outfall, and channel and flood protection requirements. Stormwater management facilities will be designed to address runoff capacity and velocity, and receiving waters will be analyzed for outfall adequacy.

**11** No notable financial effect on the I-495 NEXT project is anticipated by the time the project is constructed. Daily traffic volumes across Northern Virginia have recovered on average to approximately 80% of pre-COVID-19 volumes, and VDOT traffic data for segments of I-495 shows that daily traffic volumes have recovered to nearly 90% of pre-COVID-19 volumes.



**Be it further resolved,** that the McLean Citizens Association urges VDOT to investigate the possibility of including in the project a single access ramp providing access from Georgetown Pike to the southbound Express Lanes, and from the northbound Express Lanes to Georgetown Pike.

12

**Be it further resolved,** that the McLean Citizens Association urges VDOT to include a sidewalk on the north side as well as the south side of the reconstructed Georgetown Pike bridge over I-495.

13

**Be it further resolved,** that the McLean Citizens Association reaffirms its longstanding support for expansion of capacity at the ALM Bridge as a vital part of completing any solution to divert Beltway commuter traffic from the McLean area neighborhood roads, and further urges the Commonwealth of Virginia and the State of Maryland to work effectively and vigorously to expand capacity at the ALM Bridge and I-495 north of the GW Parkway to I-270.

14

*September 2, 2020*

McLean Citizens Association, P.O. Box 273, McLean, Virginia 22101

cc: Abraham Lerner, Virginia Department of Transportation  
Susan Shaw, Virginia Department of Transportation  
Allison Richter, Virginia Department of Transportation  
John Foust, Dranesville District Supervisor  
Barbara Favola, State Senator, 31<sup>st</sup> District  
Kathleen Murphy, State House of Representatives, 34<sup>th</sup> District  
Tom Biesiadny, Director, Fairfax County Department of Transportation  
Brett McKenzie, Transurban

**12** Various potential Express Lanes connections were considered during early concept planning stages of the project. It was determined that no access would be provided to and from Georgetown Pike due to the historic and cultural resources along Georgetown Pike both east and west of I-495, as well as input from local residents. The lack of Express connections to Georgetown Pike is designed to (and forecasted to) reduce cut-through traffic along Georgetown Pike and adjacent local roads.

**13** A shared use path will be provided on the south side of the bridge and a sidewalk will be provided on the north side. This represents an update to the plans, based on continued input from the public and from Fairfax County Park Authority.

**14** Replacement of the American Legion Memorial Bridge (ALMB) is included as part of the Maryland managed lanes project, which is currently underway. VDOT is working closely with Maryland on the design of this segment of the project.

McLean Citizens Association



The Voice of McLean for Over 100 Years

P.O. Box 273 – McLean, VA 22101

September 10, 2020

The Honorable Shannon Valentine  
Secretary of Transportation  
Commonwealth of Virginia  
1401 E Broad Street  
Richmond, VA 23219

Re: VDOT 495 NEXT

Dear Secretary Valentine:

Enclosed on behalf of the McLean Citizens Association (“MCA”) is a copy of a resolution on 495 NEXT that was adopted by our board on September 2, 2020. The MCA is a volunteer, non-governmental organization that has served since 1914 as an unofficial town council for the residents of the McLean Area, which has no governmental structure of its own. The MCA has provided a forum for McLean area residents to have a voice in resolving community problems and county-wide issues affecting the area.

Our resolution conditionally supports the 495 NEXT project, as described in the Environmental Assessment. We continue our long-standing endorsement for capacity relief at the American Legion Memorial Bridge and connecting roadways to reduce neighborhood cut-through traffic.

While we support the project, we have important concerns in two areas: financial and environmental. While these concerns are set forth in detail in the resolution, some are worth mentioning in this letter.

- VDOT should not proceed to sign final agreements or begin construction work until the longer-term aspects of the COVID-19 pandemic on transportation are understood;
- VDOT and Transurban should implement a comprehensive stormwater management plan for the entire study area, including adjacent private properties, to mitigate the impact of stormwater runoff from the completed project on those properties, the adjacent streams, and the Potomac River;
- VDOT should provide timely and complete notices of any construction activity that impacts private and public property in the McLean area;
- There should be an agreement to mitigate the loss of 118 acres of generally mature trees;
- Effort should be made to minimize the footprint of Scott’s Run Nature Preserve and to avoid temporary use of parkland during construction, using existing paved areas when possible; and
- VDOT should undertake natural resource inventories and ecological surveys in areas potentially affected by the project, including within the Preserve, and provide a cash grant to Fairfax County Park Authority for removal of invasive plants and for the planting of new native plants at the Preserve.

The MCA looks forward to working with VDOT to provide input to this important transportation project and to address important community concerns.

Respectfully,

Robert H Jackson, President  
David Wuehrmann, Chair, Transportation Committee



# COMMONWEALTH of VIRGINIA

## Office of the Governor

Shannon Valentine  
Secretary of Transportation

October 5, 2020

Robert H. Jackson, President  
David Wuehrmann, Chair, Transportation Committee  
McLean Citizens Association  
P.O. Box 273  
McLean, VA 22101  
**By email to [rhjackson10@verizon.net](mailto:rhjackson10@verizon.net) and [david.wuehrmann@gmail.com](mailto:david.wuehrmann@gmail.com)**

Dear Messrs. Jackson and Wuehrmann:

Thank you for reaching out to me regarding the 495 Express Lanes Northern Extension (Project NEXT) and sharing the Resolution adopted by the McLean Citizens Association (MCA). As someone who has worked in various aspects of Transportation since 2006, I am not aware of a more thoughtful or more engaging Resolution. Given your commitment to capacity relief at the American Legion Memorial Bridge and reduction of cut-through traffic in your neighborhoods, I understand the MCA's conditional support for Project NEXT, as well as the concerns you raise regarding the impact of COVID-19, financial considerations, and environmental responsibility.

Because I recognize a letter cannot resolve all of your questions, I am asking Rob Cary, Chief Deputy Commissioner of the Virginia Department of Transportation (VDOT) and Chair of the Environmental Subcommittee of the Commonwealth Transportation Board (CTB), to work directly with you and to serve as a liaison with my office.

Transformative projects like Project NEXT are planned and designed to address projected regional growth decades beyond implementation. Since the pandemic emerged, VDOT has been presenting traffic volume trends to the CTB. At the September 16, 2020, meeting, it was reported that interstate traffic during peak periods continues to return to the network and is already at 90% capacity as compared to this time last year. As you may also be aware, in addition to our ongoing work with Maryland on the Capital Beltway Accord, Virginia and Maryland are conducting an independent, joint transit study of this corridor, which may help avert what could be even greater demand for single-occupancy driving.

Prior to the effects of COVID-19, this corridor could not meet the demand, experienced the longest rush hour period of any corridor in the Commonwealth, and was regarded as one of Northern Virginia's most significant chokepoints, which affects safety, quality of life, and economic opportunity. Given the resilience of the network and growing daily traffic volumes, Project NEXT will significantly benefit the capacity of this interstate, as well as provide critical

relief for the surrounding side streets. As the Commonwealth is advancing its economic recovery, this project will play an active role in how the region is being shaped for the future.

VDOT and Transurban are committed to working with the MCA to mitigate the impact of stormwater runoff. To address both water quantity and quality, our team evaluated more than 100 sites along the project corridor to place stormwater management basins, with 19 stormwater management basins currently incorporated into the design. These locations were determined in coordination with the Virginia Department of Environmental Quality to accomplish one or more of the following objectives: 1) preserving natural features, including streams and forested areas; 2) meeting offset requirements from the existing Dominion Energy transmission line along the western border; and 3) minimizing the movement of significant structures that are to remain along the corridor, including sound walls. Additionally, the team is evaluating 13 drainage outfalls along the corridor.

Your letter raises important concerns regarding the 118 acres of tree loss documented in the Natural Resource Technical Report. The Environmental Assessment (EA) reported a Limits of Disturbance (LOD) not only for Project NEXT, but also including future phases of development surrounding the Dulles Toll Road interchange. While Project NEXT represents Phase 1, with tree loss anticipated to be approximately 35 acres (including additional lanes and laydown areas), we support your recommendations of conducting a tree survey, minimizing impacts as much as possible, and working with the MCA on opportunities to replant where feasible. As part of the project's final design process, areas within VDOT right-of-way will be identified for revegetation and the use of native species will be required.

As documented in the EA, Scotts Run Nature Preserve is subject to regulations set forth in Section 6(f) of the Land, Water and Conservation Act. As a result, the project team will need to identify replacement land for impacts to Scotts Run Nature Preserve that is acceptable to the Fairfax County Park Authority (FCPA) and the Department of Interior (DOI), which has jurisdiction over Section 6(f) properties.

As you know, the initial design of Project NEXT had an impact to Scotts Run Nature Preserve of approximately 3.21 acres due to a utility easement Dominion Energy holds with the FCPA between the western edge of Scotts Run Nature Preserve and I-495 right-of-way. Extensive coordination among VDOT, FCPA, and Dominion Energy has resulted in an innovative design that currently does not require realignment of the power line, reducing the impact to Scotts Run Nature Preserve to approximately one acre. The design will be provided through the procurement process to the design-build teams as part of the technical requirements, and cannot be increased without coordination with all parties. Like other VDOT projects with similar impacts to Section 6(f) land, DOI and FCPA authorization is required, including the management of invasive species. VDOT is currently working with FCPA to establish suitable replacement land. Proposed mitigation measures are summarized in Appendix A of the EA.

In order for the design-builder to obtain a federal permit from the U.S. Army Corps of



Robert H. Jackson  
David Wuehrmann  
October 5, 2020  
Page 3

Engineers, impacts to threatened and endangered species and their habitats must be satisfied through the Endangered Species Act. It will be the responsibility of the design-builder for this project to obtain a federal permit and conduct all necessary surveys.

A natural resource inventory was completed as part of the EA within the study area that includes the entire LOD, which represents the largest likely project footprint. There are no project impacts anticipated outside of this LOD. As part of the natural resource inventory, surveys were conducted for the northern long-eared bat, little brown bat, tri-colored bat, and wood turtle. The project team conducted this research in coordination with the U.S. Fish and Wildlife Service, Virginia Department of Wildlife Resources (formerly, the Department of Game and Inland Fisheries), National Marine Fisheries Service, and the Virginia Department of Conservation and Recreation. Further, preliminary temporary construction easements are designed to minimize impacts, and the project team will ensure that the design-build contractor seeks additional ways to minimize impacts when establishing necessary construction easements and staging areas during the project's final design process, including existing paved areas within VDOT right-of-way.

Proactive public outreach and engagement is a top priority across the Transportation Secretariat, and an integral part of our major highway construction projects. Dedicated communications staff from VDOT and its project partners are tasked specifically with providing regular updates and advance notification of construction activities and impacts to neighboring residents and the traveling public. Property owners who may be affected by right-of-way impacts, including temporary easements or construction staging areas, will be notified and coordinated with directly during the right-of-way acquisition phase, and before and during construction. In addition, VDOT maintains a project website, [www.495northernextension.org](http://www.495northernextension.org), where updates and notices are shared.

Your letter and Resolution will be added to the public record for the project's public hearing and, along with all other comments received, will be included in the documentation that the Federal Highway Administration (FHWA) receives before issuing a decision on VDOT's environmental assessment and preliminary design of the project. My hope is that this letter provides you with an added perspective. Please know you can also expect further design refinements as the project progresses to reduce impacts and lower the overall project costs.

Members of our project team, including Chief Deputy Commissioner Rob Cary and Megaprojects Director Susan Shaw, are scheduled to meet with your association's Transportation Committee on October 13<sup>th</sup>, providing current information related to the project's environmental assessment findings and preliminary design work. This information will be presented at the virtual public hearing on October 5<sup>th</sup>, and at our in-person, by-appointment-only public hearing on October 8<sup>th</sup>. The public hearing comment period concludes on October 23<sup>rd</sup>. In addition, two informal, virtual Question-and-Answer sessions were held prior to the public hearings on the evenings of September 28<sup>th</sup>

Robert H. Jackson  
David Wuehrmann  
October 5, 2020  
Page 4

and September 30<sup>th</sup>. More information about upcoming hearings and the project can be found at [www.495NorthernExtension.org](http://www.495NorthernExtension.org).

Messrs. Jackson and Muehrmann, I thank you again for your letter, Resolution, support and thoughtful consideration of Project NEXT. The MCA is a valued community partner, and we look forward to continuing the work on this generational project together.

With warmest regards,

A handwritten signature in black ink, appearing to read 'Shannon Valentine', with a long horizontal flourish extending to the left.

Shannon Valentine

cc: The Honorable Barbara Favola, Virginia Senate, 31<sup>st</sup> District  
The Honorable Kathleen Murphy, Virginia House of Delegates, 34<sup>th</sup> District  
John Foust, Fairfax County Board of Supervisors – Dranesville District  
Tom Biesiadny, Director, Fairfax County Department of Transportation  
Commissioner Stephen Brich, Virginia Department of Transportation  
Chief Deputy Commissioner Rob Cary, Virginia Department of Transportation  
Helen Cuervo, Northern Virginia District Engineer, Virginia Dept. of Transportation  
Susan Shaw, Megaprojects Director, Virginia Department of Transportation  
Abraham Lerner, Virginia Department of Transportation  
Allison Richter, Assistant Northern Virginia District Administrator, VDOT  
Brent McKenzie, Government Relations and Community Outreach Manager, Transurban  
Amanda Baxter, Director of Project Development – North America, Transurban



October 12, 2020

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Alexandria Times  
Fort Hunt Herald  
Mount Vernon Gazette

Ken Connors  
Project Engineer, VDOT Mega Projects  
4975 Alliance Drive  
Fairfax, VA 22030

RE: 495 Express Lanes Northern Extension Project

Dear Mr. Connors,

The extension of Express Lanes on the Capital Bank is a topic of significant interest to all businesses in the Metro DC area. The American Legion Bridge is a significant choke point that hinders the flow of commerce between Virginia, Maryland and the mid-Atlantic region. The multiple hours of congestion in this part of the Beltway prevents businesses, work teams, and individual employees from performing in a timely manner.

The Mount Vernon Lee Chamber of Commerce strongly endorses the proposal to extend the I-495 Express Lanes in this congested corridor. We urge VDOT to expeditiously move this process forward and give businesses and drivers a choice on how to navigate the traffic on the Capital Beltway. Extending the Express Lanes to Maryland will be an advantage for everyone.

Thank you for your attention to our concerns and we look forward to being able to travel from Springfield to Maryland on the I-495 Express Lanes.

Sincerely,

Stanley Koussis  
Chairman



March 18, 2020

Mr. Abi Lerner, PE  
Virginia Department of Transportation  
5975 Alliance Drive  
Fairfax, Virginia 22030

Re: 495 Next Project

Dear Mr. Lerner:

On behalf of NAIOP Northern Virginia, I am writing to express our strong support for the 495 Northern Extension Project (495 Next). NAIOP Northern Virginia is a regional association with over 950 members representing commercial real estate developers, owners, investors and asset managers. The major commercial property owners in Northern Virginia are NAIOP members. They play an important role in the economic success the Commonwealth of Virginia. A key element of our mission is positively impacting the environmental, social and economic quality of life in Northern Virginia. 495 Next will further each of these elements of our work.

The region's transportation infrastructure is being pushed to its limits. It is vital that the Commonwealth continue to leverage private sector funding to improve the Express Lanes network. The 495 Express Lanes have been a great success, and that is why we strongly support 495 Next, expanding the Express Lanes to the George Washington Memorial Parkway.

Twice daily, thousands of residents sit in traffic jams near the Maryland border which prevent them from getting where they need to be in an efficient timeframe. It's time for us to reclaim our time, and 495 NEXT will do just that. The project, funded at zero cost to taxpayers, will cut commute times in half and improving safety. Additionally, 495 NEXT is an important investment in the region's future transportation infrastructure, as it will connect seamlessly to future connections across the rebuilt American Legion Bridge to Maryland's Traffic Relief Plan.

The benefits of 495 NEXT will be felt by all residents, not just drivers. Communities like McLean will see their quality of life improved by a reduction in cut-through traffic, with drivers no longer needing to use residential streets to circumvent congestion that prevents them from reaching the Dulles Toll Road and George Washington Memorial Parkway. Transit users will be able to enjoy a reliable and

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Cushman & Wakefield

**Daniel J. Severn**  
St. John Properties, Inc.



Mr. Abi Lerner, PE

March 18, 2020

page two

prompt trip instead of being stuck in traffic. Finally, the project will create thousands of local jobs and stimulate billions in economic activity for the region.

495 NEXT is a positive step towards relieving the region's rampant traffic congestion and must be advanced to protect the region's positioning for future growth.

Sincerely,

A handwritten signature in black ink that reads "Martha Marks". The signature is written in a cursive style with a large, sweeping initial 'M'.

Martha D. Marks

President



March 11, 2020

Mr. Abi Lerner, PE  
Virginia Department of Transportation  
4975 Alliance Drive  
Fairfax, VA 22030

Dear Mr. Lerner:

The Northern Virginia Chamber of Commerce, representing 700 members with over 500,000 employees, is committed to ensuring that our region remains the best place to start and grow a business. In order to maintain our position as a top business destination we must continue to invest in developing a 21st century transportation network aimed at improving our mobility.

That 21st century transportation network requires both public sector investments as well as leveraging private sector investment and innovation. That is why we strongly support the 495 NEXT project that will extend the 495 Express Lanes to the George Washington Memorial Parkway. 495 NEXT will create more than 6,000 jobs and inject more than \$800 million in economic activity into the region. But, maybe more importantly, it will reduce congestion in the region and provide new travel choices, that will help make the Tysons and McLean area more attractive to new businesses and help the existing businesses flourish.

495 NEXT is also a critical first step to getting the American Legion Bridge project completed. The American Legion Bridge project is the most critical transportation project in the region. Once these two projects are completed, the full economic potential of this region will be deployed.

The 495 NEXT extension will move more people, improve safety and improve the quality of life for residents in McLean. We strongly support this project.

Sincerely,

A handwritten signature in black ink that reads "Julie Coons". The signature is written in a cursive, flowing style.

Julie Coons  
President & CEO  
Northern Virginia Chamber of Commerce

November 24, 2020

VDOT Northern Virginia District Office  
ATTN: Abi Lerner, P.E.  
4975 Alliance Drive  
Fairfax, VA 22030

Submitted via email to [495NorthernExtension@VDOT.virginia.gov](mailto:495NorthernExtension@VDOT.virginia.gov)

**RE: 495 Express Lanes Northern Extension Project**

To Whom It May Concern:

I am writing on behalf of the 1.4 million members and supporters of the National Parks Conservation Association, a non-partisan nonprofit organization dedicated to preserving and protecting our national park sites for present and future generations. Included in our 1.4 million supporters are over 39,000 Virginians and more than 28,000 Marylanders. We are writing to share our concerns with the negative impacts the 495 NEXT project may have on our national park sites and to urge you to avoid and to minimize these impacts.

**Revisit Alternatives Analysis**

The coronavirus pandemic has fundamentally changed American workforce patterns and transportation needs. As a consequence of this, according to Global Workplace Analytics ([www.globalworkplaceanalytics.com](http://www.globalworkplaceanalytics.com)), 25 to 30% of the workforce will be teleworking multiple days per week by the end of 2021. VDOT must revisit the project's alternatives analysis to determine how the pandemic will influence traffic patterns both immediately and in the long term. This will inform your decisions on what is actually necessary in the way of congestion relief and if that congestion even remains in a post coronavirus world.

1

The Alternatives Analysis is also lacking in its consideration of transit friendly options and transit enhancements, focusing instead on single occupancy vehicles as the travel mode to facilitate by expanding the highway. High quality transit service on dedicated or express lanes and expanded use of bus rapid transit are among the many options that should be thoroughly vetted.

2

**Address Project's Impact to Air, Land and Water**

VDOT must address, avoid, and minimize pollution to our region's air, land, and water that will be created both by the project's construction and by reliance on single occupancy vehicles on the road. By adding impermeable surfaces, this project will increase polluted stormwater runoff that will end up in our regional streams and the Potomac River. Removing tree canopy will make our region hotter, increase

*Comment continued on next page*

1 The COVID-19 public health emergency is not anticipated to result in additional impacts that would substantiate the need for a supplemental analyses to be prepared. In order to evaluate the impacts of the COVID-19 public health emergency, VDOT conducted an assessment of traffic operations utilizing the reduced traffic levels observed at the beginning of 2021. The analysis confirmed that even with the reduced volumes there would be significant congestion in the corridor in 2025 and 2045 without the implementation of the I-495 NEXT project. The implementation of I-495 NEXT helps address the congested conditions for the scenario with reduced traffic levels resulting from changes in travel patterns associated with the COVID-19 public health emergency. The results of the analysis of reductions in traffic due to the COVID-19 public health emergency are documented in Appendix K of the project's Interchange Justification Report.

2 The Build Alternative described in Section 2.2.2 of the EA would result in a transit enhancement. Express Lanes provide a dedicated running way for buses (which is shared with HOV-3+ vehicles and toll paying vehicles). Buses and HOV-3+ vehicles do not have to pay to use of the facility. Through the use of dynamic tolls, the operator can manage traffic flows to allow buses to travel at higher desired speeds and to provide better travel time reliability for transit trips. With the provision of the dedicated running way, transit operators are able to run transit routes that provide a travel time advantage to potential passengers. This is a condition similar to the operation that may be provided with the implementation of a Bus Rapid Transit facility. The provision of fast and reliable transit service serves as an incentive for drivers to shift to transit rather than use their automobiles.

As indicated in the November 30, 2020 letter from Secretary Valentine to the Chairman of the Fairfax County Board of Supervisors, the Commonwealth of Virginia is committed to provide dedicated, ongoing support for transit services along the corridor as part of the larger I-495 NEXT project. So while this transit operation is being studied separately from the roadway improvements analyzed in this EA, this commitment ensures that the I-495 NEXT project, together with the existing I-495 Express Lanes, provide multimodal solutions to move more people through the corridor.



*Comment continued from previous page*

greenhouse gases, and destroy important wildlife habitat in an urban area already lacking for green space. When we expand highways that cater to single occupancy vehicles, greenhouse gas emissions expand as well.

### **Impacts to the George Washington Memorial Parkway**

Scenic parkways are a special class of national park intentionally designed as a picturesque roadway to connect sites of historic significance. One of our oldest parkways, the George Washington Memorial Parkway connects over 7.5 million motorists each year to sites honoring George Washington, Clara Barton, Teddy Roosevelt, and Lady Bird Johnson. Our nation's scenic parkways were never built to serve as commuter routes. Instead they were established as national parks to give visitors a respite from the world to enjoy the natural beauty and historic significance of the site.

The George Washington Memorial Parkway would be directly and negatively impacted by the proposed 495 NEXT project. In addition to increased air and water pollution, the park would face loss of green space and wildlife habitat, and increased light and noise pollution. The importance of an unimpaired viewshed is essential to enjoy our scenic parkways so sound barriers typically used by VDOT to address noise are not an option here and should not be employed. The parkway would lose between 33 and 58 trees, reducing habitat and marring the view while increasing greenhouse gases and polluted stormwater runoff. Any new signage would further deface the parkway. The EA does not include the number of national park acres you expect the project would impact, making it difficult to provide comment on those impacts. This information should be made available to the public for consideration and comment.

We respectfully urge VDOT to reexamine your Alternatives Analysis to accommodate a post-coronavirus workforce and to increase transit friendly options; and avoid and minimize impacts to the George Washington Memorial Parkway as you revise plans for the 495 NEXT project.

Thank you for considering our views.

Pamela E Goddard  
Senior Program Director,  
Mid-Atlantic Region  
National Parks Conservation Association  
[pgoddard@npca.org](mailto:pgoddard@npca.org)  
202.604.3781

3

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3

I-495 NEXT is required to comply with the administration, implementation, and enforcement of the Virginia Stormwater Management Act through permits issued by a Virginia Stormwater Management Program (VSMP) authority. In accordance with the Virginia Administrative Code (9VAC25-870), stormwater management infrastructure would be provided to address runoff from new impervious surfaces. Water quality best management practices (BMP) would mitigate the nutrient impact from the new impervious surfaces. Water quantity would be addressed through the implementation of stormwater management facilities, adequate outfall, and channel and flood protection requirements. Stormwater management facilities would be designed to address runoff capacity and velocity, and receiving waters would be analyzed for outfall adequacy.

There are currently no explicit federal requirements pertaining to transportation project-related greenhouse gas (GHG) emissions, although a qualitative GHG assessment was completed in 2019 to help support an informed decision. In the absence of federal requirements, VDOT is currently evaluating options to address GHG emissions and climate change impacts in environmental documents. Virginia's participation in the Transportation and Climate Initiative may also result in future GHG emission reductions. Although regional vehicle miles traveled (VMT) is anticipated to increase between 2018 and 2045 (consistent with national and local trends over the past several decades), VMT is expected to be lower in the 2045 Build scenario compared to the 2045 No Build scenario, due to fewer circuitous cut-through trips avoiding the Capital Beltway, as observed today. A major factor in mitigating potential increases in VMT between 2018 and 2045 is EPA's GHG emission standards, implemented in concert with national fuel economy standards. The Energy Information Administration (EIA) estimated that fuel economy will improve by 65% between 2018 and 2050 for all light-duty vehicles. This improvement in vehicle emissions rates is more than sufficient to offset the increase in VMT over this period. Thus, the project area would see a net reduction in GHG emissions under the 2045 Build Alternative compared to the 2045 No Build Alternative or the 2018 existing conditions. The recent rollback of some light-duty vehicle fuel economy standards may reduce the EIA's projections of future fuel economy benefits, but improvements in GHG emission rates are still planned for light, medium, and heavy-duty vehicles in the coming years. Therefore, the recent rollback is not reasonably expected to change the conclusions of the qualitative GHG analysis in the Air Quality Technical Report. The impacts of the recent rollback would not be able to be adequately quantified until the EPA releases a MOVES model update that incorporates the new light-duty vehicle GHG emission rates.

Section 3.15.2 of the EA states "There would be approximately 118 acres of tree clearing associated with the construction of the project due to the widening of the roadway, ramps and interchange re-configurations, noise walls, stormwater management facilities, and all other appurtenant structures." Habitat that would be affected by the project is primarily edge habitat along the highway in the right-of-way, in interchange loops, and the area in the median. Culverts connecting streams under roadways offer limited passage, and the habitat fragments result in low quality edge habitat. Habitat in these areas also is typically poor quality due to access restrictions posed by the travel lanes. Increasing the width of the roadway corridor would not likely increase habitat fragmentation as forested land would not be newly separated from contiguous forest. A revegetation plan would be developed during final design to identify replacement vegetation locations and types where feasible following construction.



greenhouse gases, and destroy important wildlife habitat in an urban area already lacking for green space. When we expand highways that cater to single occupancy vehicles, greenhouse gas emissions expand as well.

### Impacts to the George Washington Memorial Parkway

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The George Washington Memorial Parkway would be directly and negatively impacted by the proposed 495 NEXT project. In addition to increased air and water pollution, the park would face loss of green space and wildlife habitat, and increased light and noise pollution. The importance of an unimpaired viewshed is essential to enjoy our scenic parkways so sound barriers typically used by VDOT to address noise are not an option here and should not be employed. The parkway would lose between 33 and 58 trees, reducing habitat and marring the view while increasing greenhouse gases and polluted stormwater runoff. Any new signage would further deface the parkway. The EA does not include the number of national park acres you expect the project would impact, making it difficult to provide comment on those impacts. This information should be made available to the public for consideration and comment.

We respectfully urge VDOT to reexamine your Alternatives Analysis to accommodate a post-coronavirus workforce and to increase transit friendly options; and avoid and minimize impacts to the George Washington Memorial Parkway as you revise plans for the 495 NEXT project.

Thank you for considering our views.

Pamela E Goddard  
Senior Program Director,  
Mid-Atlantic Region  
National Parks Conservation Association  
[pgoddard@npca.org](mailto:pgoddard@npca.org)  
202.604.3781

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4

The GWMP and its associated parks and trails are owned by the United States and administered by the NPS. As both a historic and recreation resource, it is protected by Section 4(f) of the U.S. Department of Transportation Act of 1966. Approximately 60 acres of the GWMP property is within the I-495 NEXT Limits of Disturbance (LOD).

Coordination with the NPS regarding potential impacts to the GWMP began in June 2018 with scoping letters. In addition, multiple meetings with the NPS and Virginia Department of Historic Resources (VDHR) were held regarding the GWMP and adjacent parklands. A listing of these meeting dates and topics discussed can be found in the *I-495 NEXT Section 4(f) and Section 6(f) Technical Memorandum* that was prepared as part of the I-495 NEXT Project and included as Appendix A of the I-495 NEXT Environmental Assessment.

The coordination process with the NPS also included the development of a Visualization Booklet in February 2020 of eight potential design options and signage plans for where the Build Alternative would tie into the existing GWMP and where express lane toll signage would be placed along the existing GWMP. The Visualization Booklet also included a table and corresponding site plan that depicts the results of the NPS-requested tree survey. Overall, the NPS expressed their concern regarding tree canopy and herbaceous plant removal, design aesthetics, potential I-495 express lane signage options/locations throughout the GWMP, and the amount of potential permanent and temporary easements needed at the I-495 tie-in location with the GWMP. Following NPS's review of the February 2020 Visualization Booklet, NPS provided VDOT with a written response on April 29, 2020 noting their preference of Design Option 1 (no retaining walls on NPS lands) and requested that VDOT look at additional ways to further minimize and mitigate the loss of forest on NPS land. On October 5, 2020, the NPS sent a follow-up letter to VDOT again stating their preference for Design Option 1 provided that VDOT further minimizes and mitigates the loss of forest on NPS land.

With NPS's identification of a preferred option at the GWMP (option 1), anticipated impacts to the GWMP would be calculated and included in the environmental document. NPS has expressed the intent to adopt VDOT's I-495 NEXT Environmental Assessment, and then would issue their own NEPA decision. VDOT would continue to work closely with NPS through finalization of the environmental document and future phases.



September 28, 2020

Virginia Department of Transportation  
4975 Alliance Drive  
Fairfax, Virginia 22030

To Whom It May Concern:

On behalf of The Northern Virginia Building Industry Association, I am writing to provide comments on the I-495 NEXT project. As you know, the 495 and 95 Express Lanes have been very successful in Northern Virginia and reduced commute times for thousands Northern Virginia residents along the I-95 corridor.

It is important that we continue to develop a robust network of express lanes, and the Interstate 495 NEXT project is an important one for the Northern Virginia region. We encourage the Commonwealth to advance bold solutions like 495 NEXT. The project not only provides near term congestion relief and safety improvements to commuters on the Capital Beltway, but also lays the groundwork for a future connection to Maryland's Traffic Relief Plan. By connecting the 495 Express Lanes to the Dulles Toll Road and George Washington Memorial Parkway, motorists who choose the Express Lanes will see their commute times halved, allowing them to spend more time with their families.

Another important reason to support the 495 NEXT project is that it will allow the Commonwealth to continue to grow its economy while providing substantial quality of life improvements to residents at zero cost to taxpayers. Additionally, the project will add thousands of jobs to the Commonwealth and generate hundreds of millions of dollars in economic activity. This is an important project to maintaining the region's competitiveness, and must be advanced to remedy regional congestion.

Finally, the 495 NEXT project will provide further enhance transportation choices such as HOV service and transit along the corridor. This is important as our region continues to look to reduce greenhouse gas emissions and reduce the amount of cars on the roads.

The Northern Virginia Building Industry Association endorses the I-495 NEXT project because it is critical for the Northern Virginia region. We encourage the approval of this project and hope the Commonwealth will move forward without delay. By approving this project, the Commonwealth could finally move forward with a project that has been delayed for many years.

Sincerely,



Mark S. Ingraio, CCP, CAE  
Chief Executive Officer



Steven Marku  
Director of Government Affairs



**COMMENTS ON 495 EXPRESS LANES NORTHERN EXTENSION PROJECT  
(aka 495 NEXT, 495 HOT LANES EXTENTION)**

**SUBMITTED 4 DECEMBER 2020**

On behalf of the Northern Virginia Citizens Association, (NOVA Citizens), whose purpose is to pursue transparency in Virginia government with an immediate focus on the current I-495 Next Hot Lanes Extension Project (the Project), we register our opposition to the 495 Express Lanes Northern Extension Project as it stands in its current Design, Environmental Damage, Timing, and Financial malfeasance. That VDOT would move forward in under these specific conditions while we have not had ample time to gather, understand, comment and speak directly with authorities and experts is alarming.

Nova Citizens Association is concerned with the disturbing facts associated with the proposed Project as it stands. We petition VDOT, Elected Officials, and Cooperating Agencies to pause the current forward progression on 495 Next without further direct citizen input to ensure that the Commonwealth of VA not enter into a Build Contract with Transurban until all parties are certain that a fair, transparent, and fact-based review of the current conditions, as dictated by law, is undertaken. This is particularly critical because any next action moves the Project forward and crosses another key threshold in taking the Project out of the hands of Virginia citizens and



committing to a contract that potentially harms Virginia citizens and taxpayers for decades to come. As set forth in more detail below, this rush to judgment for approval and implementation of this project is reckless in the midst of a global pandemic (and economic disenfranchisement) not seen in generations, and is the product of flawed, dubious and incomplete data and must be rejected by the Commonwealth of Virginia.

NOVA Citizens is in the process of retaining counsel and preparing a more detailed study of the costs and benefits of the Project put forth by VDOT and we hope to have that analysis available in the coming weeks. As a way to begin to address these transparency concerns we have filed several Freedom of Information Act (FOIA) Requests. Nevertheless, based on our study of the inadequate, missing and misleading data currently made available to the public in the few meetings VDOT has held, it is clear that this Project should not go forward at this time.

At a minimum, the Project needs to be reevaluated in the context of the COVID pandemic and Governor Ralph Northam's ensuing emergency order dated March 12 and the impact on crucial economic and public health and safety factors, including: drastically changed traffic patterns, the move to remote work, Commonwealth finances, Transurban's junk bond status and sell-off of assets in VA Hot/Toll Lanes, recent revelations of misrepresented traffic data, inability for mitigation of environmental impact within the region and scope of disturbance that will be offset by purchased credits.

Furthermore, simple logic, as well as VDOT traffic analysis, dictates that the Project should not go forward without a clear understanding of the status and timing of Maryland's Hot Lanes project and plans for expanding the American Legion Bridge, a project with significant opposition in Maryland. To move forward with a

project of this size and complexity without careful evaluation of the impact of one of the major health, safety and economic events of our times seems reckless at minimum.

**Summary of Key Reasons the This Project Should Not Go Forward at this Time**

There are numerous reasons why the project should not be approved at this time. Further details, including legal considerations, are expand in a more thorough white paper study of the Project available upon request (request to president@novacitizensassociation.org). Nevertheless, set forth below is a short summary of key reasons based on the limited information currently available to the public:

**1. VDOT has done no analysis of the impact of COVID-19 and Governor Northam’s emergency order on the Project.**

- VDOT has repeatedly presented a traffic study claiming that the traffic had returned to 80-90% pre-COVID levels. Through questioning by private citizens it was made clear that the study **did not** include the 495 corridor at issue in the Project. Rather VDOT aggregated roadways throughout the region, not including 495, yet misleadingly represented that the data was applicable for decision-making. Under questioning, VDOT acknowledged that the NoVa495 region did not, in fact, fall into the “return to normal traffic conditions” as the citizens and work patterns of this area’s particular workforce allowed for greater telecommuting. This speaks volumes and should lead the BOS to question the reliability and integrity of all the information VDOT is submitting in support of the Project.

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**1** The 2018 conditions evaluated in the study are representative of typical conditions in the corridor. The current traffic conditions associated with COVID-19 are anticipated to be temporary, as compared with the ultimate design year used to design the project, which is required to be a minimum of 20 years from the current year. The analysis of future conditions is based on 2025 and 2045 models to account for anticipated growth. VDOT used the federally recognized Metropolitan Washington Council of Governments (MWCOG) travel demand forecast model to generate future year traffic forecasts. This regional model is the best tool available to assess traffic operations in the future. Furthermore, the Federal Highway Administration (FHWA) recognizes the latest approved regional model (MWCOG model in the Washington Metropolitan Area) in the preparation of transportation NEPA studies and documents.

Daily traffic volumes across Northern Virginia have recovered on average to approximately 80% of pre-COVID-19 volumes, and VDOT traffic data for segments of I-495 shows that daily traffic volumes have recovered to nearly 90% of pre-COVID-19 volumes. Monitoring of traffic conditions along the American Legion Bridge over the past six months has demonstrated that congestion along this segment of I-495 is gradually returning to a regularly occurring regional bottleneck with slower speeds and progressively longer queues. Traffic volumes are anticipated to return to pre-COVID-19 levels by the time the project is constructed and operational. In order to understand the potential impacts of reduced traffic demand on the network and the proposed project, VDOT conducted a sensitivity study of impacts to traffic forecast volumes and traffic operations under a conservative scenario where impacts of COVID-19 were long-lasting into the future horizon years, with reductions in traffic volumes.

- One need not stop there. Stand at the intersection of Georgetown Pike and 495 and use any one of your five senses lets you understand that traffic is not back to pre-COVID levels. We petition VDOT to put a time-lapse camera at the Georgetown Pike exit on 495 for two weeks and come back to the BOS with the results.
- Moreover, every objective, data-driven study of the impact of COVID and the Governor's order on traffic patterns in the area concludes that traffic is not back to pre-COVID levels and will not be for the foreseeable future. While no one has a crystal ball and we all wait for a vaccine that brings a swift recovery, the consistent and unsupported position of VDOT officials that traffic patterns in Northern Virginia will simply return to normal and that the "current conditions" evaluated in the EA have not changed is not supported by current data and should not form the foundation of a decision to move forward now oblivious to the reality of the world around us. Indeed, these drastically changed conditions call into question the legal adequacy of the prior EA under the National Environmental Protection Act (NEPA) and related laws.
- In contrast to VDOT's opinions, several data-driven studies from knowledgeable consulting firms forecast fundamental and lasting changes to the economy and commuting patterns. For example, a July 9, 2020 study by the Northern Virginia Transportation Authority, "COVID-19: Transportation Impacts and Opportunities," uses actual data to analyze the impact of COVID on traffic, telecommuting and what the "New Normal" will look like from 2021-2025. It evaluates four scenarios: 1) Quick Recovery (which we certainly are not in), 2) Active Transportation, Second Wave, and 4) Cautious Recovery. On pages 32-34, the report draws the following conclusions:
  - All four scenarios reduce auto trips

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- Active Transportation scenario has the largest impact for auto trips (46 percent reduction)
- All four scenarios reduce hours of delay with the impact “most pronounced among inner jurisdictions” and impact “evident along major corridors”
- Teleworking and economic impact in the New Normal results in “traffic volumes and transit ridership that do not fully recover to pre-COVID levels” and “significant reductions in time spent traveling and time lost in congestion.”

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- Similarly a report from the Virginia Secretary of Finance projects some \$400 million shortfall in transportation revenues for 2021 and beyond. Greg Potts, WMATA, on a Tyson Committee call (Nov. 13, 2020) stated that initial studies estimated Spring 2021 would bring back 48% traffic, but new information reveals that the estimate is now only 20% would return by Spring 2021. Aubry Lane, at a NVTA meeting (videotaped) stated that tolling on Dulles tolls and Hot Lane tolls will be a 4 year to recovery...how much is VA going have to pay for guaranteed tolling revenues.
- Nobody knows if these data-driven forecasts are accurate-but nobody knows they are not. The point is not to commit to a multi-billion dollar, multi-ton concrete, irreversible project in the middle of this uncertainty.

**2**

**2. Pushing forward with the Project Now without a clear understanding of Maryland’s plans for 495 and the American Legion Bridge makes no sense.**

- State of Maryland timing and lack of clarity on the bridge project are more than enough reason to pause. VDOT persistently claims that the Project has independent value but its own plans do not support this proposition. Rather, the data used

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**2** Based on the existing 495 Amended and Restated Comprehensive Agreement (the “ARCA”), Transurban is fully responsible for the tolling revenue risk on the 495 Express Lanes. Therefore, Virginia is not at risk for tolling revenues that are below projections.

**3** VDOT continues to work closely with Maryland to align the design of Project NEXT with the selected alternative that results from Maryland’s separate environmental process. It is a focus of Virginia to not only provide a seamless connection but to also focus on efficient construction to minimize disruption to the traveling public. The Record of Decision for the separate I-495 and I-270 Managed Lanes Study in Maryland is anticipated to be complete by Fall 2021. Maryland has selected a Preferred Alternative, as part of their separate environmental process, that would provide the most seamless connection with the Virginia 495 Express Lanes project and has selected a project developer for advancing the Maryland I-495 Managed Lanes Phase 1 project.



demonstrates that the Project should not proceed without Maryland proceeding even without the drastic impact of COVID. The “independent” Project purports to relieve traffic. It does not. This enormous, harmful endeavor merely moves the chokepoint forward to a dead end at the American Legion Bridge.

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- The 495NEXT Express Lanes project would extend HOT Lanes approximately three miles from Rt. 267 to the George Washington Memorial Parkway (GWMP), moving the chokepoint miles but not resolving the chokepoint. In fact, if the Express Lanes are built pre-Maryland project (i.e., new American Legion Memorial Bridge (ALMB), Rte. 270 expansion) the Northbound congestion significantly increases for General Purpose Lanes during peak travel times under the Build Alternative and the duration of congestion (rush hour) will increase over the current peak travel period of four hours in AM/over six hours in PM. Northbound congestion decreases only for the Northbound Express Lane, yet these decreases are not meaningful as the HOT Lanes allow travelers to move more quickly to the new chokepoint. Illogically the projects add additional lanes to a moved chokepoint that maintains the same number of lanes as the old chokepoint. More lanes to the same size funnel. Southbound traffic congestion is essentially the same under General Purpose and Express lanes for both No Build and Build Alternatives. Average travel time for General Purpose lanes increase. The only alternate mode of transportation is the Express Lane, only for three miles, and only for those who are willing, and able, to pay costly tolls.
- This is consistently recognized. Here are some examples:
  - Supervisor Foust “...until Maryland finishes its project...we’re making the situation worse for the general purpose lanes on the beltway. And, that’s a problem, a huge problem...it’s like you can’t get any worse, well, apparently you can. I mean it’s hard

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**4** In regard to changes in congestion in the northbound GP lanes: in the *I-495 Traffic and Transportation Technical Report*, please refer to Table 7-9 (2045 AM Peak Period Travel Time Comparison) and Table 7-10 (2045 PM Peak Period Travel Time Comparison). With the full build-out of this project and Maryland’s project in place, in the northbound direction of the GP lanes, there is a nearly 4-minute travel time savings in the AM peak period (from approximately 12 min in the No-Build to roughly 8 min in the Build scenario), to go along with a 5.5-minute travel time savings to eastbound Route 267 due to reduced queue spillback from northbound I-495 (from approximately 7.5 to 2 min), and 4.5-minute northbound GP lanes travel time savings in the PM peak period (from approximately 28 min to 23.5 min). These travel time savings are attributable to having the seamless managed lanes systems connected across the state line. These GP lanes improvements are separate from travel time savings for users of the northbound Express Lanes, who have a seamless trip with reliable travel times in the Build condition but must use the congested GP lanes in the No Build condition.

By increasing the person-carrying capacity of I-495 and by providing a reliable travel option using the Express Lanes, drivers would have less incentive to use local cut-through routes. Traffic models project a reduction in traffic volume and a reduction in travel delay on the local street network, most notably along Georgetown Pike, with the project in place.

to imagine how... it's so bad and you're making it worse..." (Fairfax BOS, Transportation Committee Mtg., 2/4/2020)

- o VDOT Director Susan Shaw: "...but I would say I would expect there to be a bottleneck without increase capacity on the bridge..." (Public Meeting Transcript, 5/20/19)

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- Claims for improved cut through traffic (arterial intersections as indicator of cut-through traffic) show marginal improvement based on roads studies. The Level of Service # intersections is essentially the same in AM for intersections near ramps for No Build/Build Alternatives. The Level of Service # of intersections improves in PM traffic for intersections near ramps for Build Alternatives. The Level of Service # of intersections are the same for extended network intersections for No Build/Build Alternatives.

5

- Additionally, these studies are based on old 2018 intersection studies (compiled years prior) performed using the CLRP inclusions and that those projects in the CLRP are completed without traffic-impact studies or proof of reported "success." These studies should not be applied to the 495next project assumption that local streets will improve because these studies are based on the faulty data. Moreover, this data is drawn from CLRP with assumptions based upon Maryland having already built the bridge and the hot lanes. Of particular note, only a few local streets cited (VDOT's blue-line chart) were studied. Local streets including Dead Run, Carper, Lawton, Holy Rood, Balls Hill Road, McLean Local streets, McLean CBC streets, the 123 corridor, Old Dominion corridor, 193 corridor and other regional streets in vicinity of Rt. 193 access were omitted, the very roads the study has been used to justify claimed improvements.

6

**5** The implementation of the I-495 NEXT project would result in increased person throughput. Virginia's managed lanes system allows HOV-3+ and transit vehicles to travel for free, encouraging transit use, carpools and vanpools. With the implementation of the I-495 NEXT project, it is anticipated that 7,600 more people per hour would move through the corridor compared to a No-Build condition.

By increasing the person-carrying capacity of I-495 and by providing a reliable travel option using the Express Lanes, drivers would have less incentive to use local cut-through routes. Traffic models project a reduction in traffic volume and a reduction in travel delay on the local street network, most notably along Georgetown Pike, with the project in place, even without the Maryland project. Traffic volume demands and corresponding delays on Georgetown Pike would decrease at 5 intersections along the corridor, including at: (1) Swinks Mill Road, (2) SB I-495 ramps, (3) NB I-495 ramps, (4) Balls Hill Road, and (5) Dead Run Drive.

The project does not generally increase the traffic demand at the adjacent intersections in the Tysons area; rather, it removes upstream bottlenecks that prevent that traffic from getting to downstream destinations under the No-Build and Existing conditions. VDOT has also been coordinating with Fairfax County on the design details and would continue to do so, looking for opportunities to improve the operations and access to the adjacent road network while minimizing impacts.

**6** All future-year traffic analyses incorporate projects included in the CLRP at the time of study since they are considered reasonably foreseeable. All background transportation projects are described in Chapter 5 of the *I-495 NEXT Traffic and Transportation Technical Report*; this chapter notes the separate Maryland managed lanes project as well as several other nearby planned improvements within the study area. The regional travel demand model used to develop traffic forecasts includes all CLRP projects for the entire Washington, DC, region.

Thus, for the purposes of NEPA, the separate Maryland managed lanes project was included in both No Build and Build scenarios for the 495 NEXT project, including the 2025 analysis year. However, based on public feedback, VDOT agreed to include an additional sensitivity analysis of the 495 NEXT project prior to the Maryland managed lanes project being constructed; this is provided in Appendix I of the *I-495 NEXT Traffic and Transportation Technical Report*.

With regard to the streets studied: the facilities and intersections shown in the referenced diagram were reviewed and approved by FHWA and Fairfax County as part of the project Framework Document. The traffic operations analysis study area goes significantly beyond the required analysis area for NEPA. Several of the facilities noted in the letter as "omitted" are included in the traffic analysis study area, including Balls Hill Road, Dead Run Drive, the Route 123 corridor, the Old Dominion corridor, and Route 193 corridor, and other regional streets in the vicinity of Route 193 (Swinks Mill Road, Spring Hill Road, Douglass Drive). The scope of the streets and local roads included in the study area was coordinated with Fairfax County DOT and FHWA; both agencies concurred with the scope of local facilities included in the analysis.



- The Project adds enormous construction disruption. If 495NEXT starts when MD starts (VA No Build Option), total construction time would be 4 years. Alarming, the construction disruption is estimated to be 6 years of construction if 495NEXT Express Lanes are built before MD Managed Lanes. And this Build before Maryland timeframe presents overall Project risks:
  - if MD Managed Lanes project is delayed, General Purpose lane congestion continues until MD Managed Lanes project is implemented
  - if placement of new ALM Bridge is modified, there is risk that Virginia I-495 lanes may need to be realigned (may be low probability, but would be high impact).

7

- The harsh rebuke from the Maryland General Assembly, signed by 69 Senators and Delegates, (*letter to MDOT, 9/23/2020*) details significant reasons why Maryland may reject the privatized toll lane road widening project. Several of the detailed flaws are mirrored within the Virginia project and specifically one inexorably tied to the ALMB and Virginia actions. Additionally, the projects are not aligned as VDOT claims.

8

- In fact, Maryland elected officials state: "It is essential that the new American Legion Bridge accommodate future rail transport, as was done for the Woodrow Wilson Bridge. By not accommodating rail, the project fails to meet the stated purpose of enhancing existing and planned multimodal mobility and connectivity. MDOT has represented that it is in a transit study related to the bridge with Virginia but no public information has been made available. Moreover, any new American Legion Bridge must have a separate bike/pedestrian pathway."

9

- Virginia's current project has precluded rail. That Virginia has failed to include rail (and not in keeping with Governor Northam Comprehensive Transportation Package, multi-modal/rail/Potomac River alternatives, January 2020), and this may prevent Maryland's rail option without VA reengineering or rebuilding, makes the current VA

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**7** VDOT continues to work closely with Maryland to align the design of Project NEXT with the selected alternative that results from Maryland's separate environmental process. It is a focus of Virginia to not only provide a seamless connection but to also focus on efficient construction to minimize disruption to the traveling public. VDOT continues to work to identify measures that could be employed to improve traffic operations both during construction, and in the interim period before Maryland implements their separate program. VDOT would continue to coordinate with Maryland and Fairfax County on traffic operations issues and minimization of traffic impacts as the project development process progresses.

**8** VDOT continues to work in coordination with MDOT to move the American Legion Bridge widening forward. Maryland has selected a project developer. It is anticipated that MDOT would enter into an agreement with the selected project developer team in 2021. MDOT recently recommended a Preferred Alternative, as part of their separate environmental process, for I-495 in Maryland which includes HOT-3 lanes (3 passenger high occupancy tolled lanes), which is consistent with VDOT's Express Lanes system. Coordination between Virginia and Maryland is ongoing and would remain focused on managing operational consistencies between the two highway systems.

**9** As noted in the previous response, MDOT recently recommended a Preferred Alternative, as part of their separate environmental process) for I-495 in Maryland which includes HOT-3 lanes (3 passenger high occupancy tolled lanes), which is consistent with VDOT's Express Lanes system. Maryland studied but did not select a rail alternative as the preferred alternative.

Under a separate but parallel study being coordinated with VDOT, The Virginia Department of Rail and Public Transportation is conducting the I-495 American Legion Bridge Transit and TDM Study in coordination with the Maryland Department of Transportation's Maryland Transit Administration (MTA). Based on the characteristics of the corridor, the transit study does not recommend the implementation of rail transit in the corridor. The study recommends the implementation of bus transit service to operate within the Express lanes. As indicated in the November 30, 2020 letter from Secretary Valentine to the Chairman of the Fairfax County Board of Supervisors, the Commonwealth of Virginia is committed to provide dedicated, ongoing support for transit services along the corridor as part of the I-495 NEXT project. This commitment ensures that the I-495 NEXT project, together with the existing I-495 Express Lanes, provide multimodal solutions to move more people through the corridor.

plan ill advised particularly as it pushes to proceed building before MD finalizes or digs. Astonishingly, even the EPA advocated in comments to the EA, that an alternative build option be robustly studied thus further exemplifying that the VA current plan is inadequate. To proceed before Maryland has determined its position on rail is reckless.

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- Additionally, as the validity of the project unraveled over the past three+ years under VA citizen scrutiny, it became clear that the traffic justification for VDOT became “independent utility” translated into flyover ramps connecting Maryland to historic George Washington Parkway. The entire move of the 495 bottleneck a few miles further along hangs on the independent utility of these ramps. In the meeting with Great Falls Citizen Association, on November 12, 2020, VDOT representatives were questioned about the justifiability of these ramps and they said that the ramps were being added “at the request of Maryland” (transcript available). The logical reasoning of VDOT planners to increase traffic, harm 50+ homes, permanently destroy historic parklands and byways, and add environmental harm to VA citizens is incomprehensible.

**10**

- VA citizens know well that the 495 backup (as confirmed by VDOT, see transcript of May 19, 2020 public meeting) is the capacity on the ALMB and that the GWP is already at full capacity. Adding more capacity, bringing cars more quickly to the already full capacity GWP (see transcripts of McLean Public Meeting, MCA TC meeting, GFCA meeting) does not constitute independent utility. This equals more delays and safety concerns in defiance of the Smart Scale logic.

**11**

- Also incomprehensible is the fact that VDOT has been undertaking another traffic study jointly with Rail and Transit (DRPT) that is running concurrently with little to no

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**10** Although the proposed lanes would terminate at the George Washington Memorial Parkway (GWMP), and the interchange provides a logical northern terminus for this study, additional improvements are anticipated to extend approximately 0.3 miles north of the GWMP to provide a tie-in to the existing road. The I-495 NEXT Project does not include improvements to the American Legion Memorial Bridge (ALMB), or flyover ramps between the ALMB and George Washington Memorial Parkway, which would be constructed by others as part of Maryland’s separate proposed I-495 Managed Lane project. VDOT and Maryland Department of Transportation (MDOT) have been and continue coordinating during development of the I-495 NEXT project and would continue to do so through final design and construction of the independent two projects. The project has independent utility since it would provide a usable facility and be a reasonable expenditure of funds even if no additional transportation improvements in the area are made, including to the ALMB.

Since the EA was completed in February 2020, additional coordination has occurred regarding the GWMP. Based on the preliminary design, VDOT has determined that the I-495 NEXT Project Build Alternative would have no adverse effect on historic properties. The State Historic Preservation Office (SHPO) at the Virginia Department of Historic Resources and the National Park Service have concurred with VDOT’s “No Adverse Effect” Determination provided that Option 1 from the *February 2020 Visualization Booklet* (included in the appendix of the EA) is implemented, along with other efforts to minimize harm and mitigate impacts.

**11** Although the traffic study for 2025 horizon year identified some potential degradation to travel times in the northbound general purpose lanes during northbound peak periods, it also showed that: there would be reductions in travel times along the express lanes of up to 5 minutes in the AM Peak and up to 24 minutes in the PM Peak; cut-through traffic on the adjacent roadway network would be reduced; more people would be moved through the 495 corridor; and delays at some key intersections would be improved. VDOT continues to work to identify measures that could be employed to improve traffic operations both during construction, and in the interim period before Maryland implements their program.



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awareness by citizens or officials. No citizen advocacy group was included. Stakeholders include consultants and engineering firms who stand as direct financial beneficiaries of the project. BOS and VDOT should not proceed until these findings are public, discussed, studied and evaluated for impact and improvements to the current 495Next Project.

12

### **3. Creating more luxury lanes in a time of economic uncertainty and financial challenges is an ethical, economic and political liability.**

- In the select few citizen meetings and one public hearing zoom, people, citizens, and elected officials have questioned if the project makes sense and is fair to the average citizen. The answer is a resounding no at this time. At the most recent BOS Transportation meeting (November 10), Supervisor Foust expressed passionate concern with proceeding with this project that runs right through his county and acknowledged that it is a mess to do this before Maryland. Supervisor McKay also raised questions as to why this made sense, why this should move forward without Maryland, and if there were any harm if the project were to be put on hold. His questions were met with silence and indications that answers would be forthcoming. A shroud of secrecy regarding the merits and hidden motives rears its head. Answers will be given out of the transparent view of the citizens.
- Supervisor Palchik articulated the concern and consideration that should guide the decision: the HOT lane would be used by a handful due to high toll cost and only those luxury lane users would see a benefit of a few meager minutes while everyone else would experience worse traffic and commutes. She astutely articulated what we all know: traffic times increase for all in the GP lanes and presents a host of social

13

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**12** Under a separate but parallel study being coordinated with VDOT, The Virginia Department of Rail and Public Transportation (DRPT) is conducting the I-495 American Legion Bridge Transit and TDM Study in coordination with the Maryland Department of Transportation's Maryland Transit Administration (MTA). The recommendations resulting from this study are aimed to work in concert with Virginia's proposed northern extension of the I-495 Express Lanes and Maryland's proposed managed lanes program for the American Legion Bridge, I-495, and I-270. Study information is available at <http://drpt.virginia.gov/transit/major-initiatives/i-495american-legion-bridge-transit-and-tdm-study/>

The DRPT held a virtual public meeting for the separate Transit and TDM Study at the Northern Virginia Transportation Authority (NVTA) on November 12, 2020. Additionally, DRPT gave a presentation to the Transportation Committee of the Fairfax County Board of Supervisors on December 8, 2020. The project team held a public meeting to discuss the findings and recommendations of the study on January 12, 2021. The Transit and TDM Study is expected to be completed in spring of 2021.

Because this study is a separate effort, the findings and recommendations from the Transit and TDM Study are not being included in the NEPA document. However, VDOT is reviewing the recommendations of the study to help develop a Transportation Management Plan (TMP) that would help improve traffic operations during construction. Based on the recommendations of the transit and TDM study, the TMP may include the implementation of a new route or new routes between Virginia and Maryland.

**13** Data from transponder transactions on the existing express lanes system show that users are representative of the overall regional demographics and diversity, based on corresponding of census areas and associated socioeconomic characteristics. The Washington Post reported in 2018: "...most 495 and 95 express users are not affluent.... About 60 percent of the frequent users said they have household incomes of less than \$100,000..." Also, according to a Washington Post report, the average toll rates for Virginia's managed lanes on I-495 and I-95 are \$5.40 and \$8.45 per trip, respectively. Experience in Virginia on I-495 shows that 82 percent of customers spend less than \$20 a month and 85 percent of trips were less than \$12. On the Virginia I-95 Express Lanes, 74 percent of customers spend less than \$20 a month.

In addition, the project provides incentives for users to carpool, vanpool, or utilize transit. Extending the 495 Express Lanes creates new opportunities for carpools, vanpools and buses to provide faster and more reliable travel. As indicated in the November 30, 2020 letter from Secretary Valentine to Chairman McKay, Virginia is committed to providing dedicated, ongoing support for transit services along the I-495 corridor as part of the I-495 NEXT project. This commitment ensures the 495 NEXT project, together with the existing 495 Express Lanes, would provide multimodal solutions to move more people.

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injustice inequities, the most obvious that HOT Lanes and surge pricing give preference to wealthy individuals, while minimum wage workers, truckers, teachers, travelers, and everyday citizens driving in the corridor are left suffering in traffic-congested general purpose lanes in the middle of a pandemic recession.

**4. VDOT has not sufficiently answered questions as to why a P3 model makes sense for the Project or provided any information on the financial performance of the existing Hot Lanes P3 contract including any residual financial commitments by Virginia taxpayers under existing projects.**

- VDOT has not demonstrated how the P3 financial model or benefits the Commonwealth or its citizens. The original VAP3 2014 Detail Level Screening Report and Recommendation for I-495 Hot Lanes Extension stated that the P3 delivery model was not suitable for the project and that it was not recommended to advance under the PPTA P3. (Available to the public on-line.) There was NO BENEFIT to the public to have a private vendor build this 495 Next Project. Rather VA should do it through our own transportation efforts. Subsequent requests for information about what happened as a result of this document, what subsequent documents may have modified or overruled these findings, and what P3 report approved and allowed the current Project to proceed have been ignored. Most recently at the BOS meeting, VDOT officials said this information was not available due to contractual confidentiality. Our FOIA request will attempt to hone in on this information and determine under what legal authority the financial performance of a major public project can be withheld from the public. We petition the BOS to hold their decisions and agreements to move forward until there is a full, transparent review of a verified,

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**14**

The 495 NEXT Project is being developed as a Concessionaire Project Enhancement in accordance with the existing 495 Amended and Restated Comprehensive Agreement (the "ARCA") signed between VDOT and Capital Beltway Express, LLC (CBE). The ARCA, executed pursuant to the Public-Private Transportation Act of 1995, as amended ("PPTA"), provides for project enhancements and the process to carry forward such enhancements, as the 495 NEXT Project. All publicly available financial performance related disclosures of the existing 495 Express Lanes can be found on the Municipal Securities Rulemaking Board (MSRB) and CBE's parent company, Transurban USA, corporate websites. Links to both websites are as follows:

- MSRB's direct link to CBE: <https://emma.msrb.org/IssueView/Details/85F397F238B9AB197A8898F2144BF609>
- Transurban's corporate website: <https://www.transurban.com/investor-centre/reporting-suite?wcmode=disabled&containerID=investor&defaultTab=2> (click on Results and Reporting, and choose FY [year] Results Investor Presentation for each year and scroll down to 495 Express Lanes data).

The Commonwealth's initial financial commitments to the initial 495 Express Lanes completed in 2012 was \$408.9 million as required under the 2007 495 HOT Lanes Amended and Restated Comprehensive Agreement (ARCA). No other commitments are expected to be "triggered" except in the events defined in the 2007 495 HOT Lanes ARCA.

**14**

unbiased Detail Level Screening Report and Recommendation that recommends that the Commonwealth enter into a contract with Transurban.

Comment  
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- Furthermore, there are little discernable improvements in the Project compared with the original P3 study, yet there is substantial change in circumstances. At the information sessions and elsewhere officials have represented that there are no “subsidies” to Transurban or other private contractors associated with the Project. We believe this may be misleading. We know that prior phases of the 495 Hot Lanes Extension Project did involve subsidies. For example, a contemporaneous news article included the following:

15

- The contract between Virginia and Transurban requires the state to pay subsidies if the number of carpoolers reaches at least 24 percent “of the total flow of all [vehicles] that are... going in the same direction for the first 30 consecutive minutes during any day... during which average traffic for [the toll lanes] going in the same direction exceeds a rate of 3,200 vehicles per hour...” During peak travel times — if carpoolers make up about one-fourth of all vehicles in the HOT lanes — the state will have to pay Transurban 70 percent of the lost toll per vehicle. Both VDOT and Transurban are downplaying the possibility that taxpayers will have to subsidize carpoolers.

16

- “Is there a back stop? The answer to that is yes. Do we think we will get there? The answer to that is no. And if we do, we still consider that a success,” says Charlie Kilpatrick, VDOT’s chief deputy commissioner. “That’s a success story because we would have such a great usage in HOV, much further beyond what we ever imagined.” [From A to B: Virginia Gears Up for New Beltway Hot Lanes, <https://wamu.org/story/12/08/03>]

**15** The transportation improvements included in the 495 NEXT project are planned to be funded through private financing supported by toll revenues.

**16** Comment noted.



- Recent information on the financial status indicates that the toll lanes in this region have been financially unprofitable. Requests for financial accounting, cost-benefit analysis, and information on the financial terms of this phase of the Project and data on any monies paid, committed or otherwise obligated by Virginia to Transurban or other private contractors under the Project have been unsuccessful. We have been told that the prior phases of the Project have not been financially successful and that Virginia will need to provide some manner of financial support to contractors to make the next phase viable and/or to compensate for prior shortfalls in toll revenues, but we don't know. That citizens cannot know the price tag of the roads they buy or the implications to their taxes are unconscionable.
- Transurban bonds for the I-95 Express Lanes Fredericksburg Extension Project were downgraded by Standard and Poor to junk bond status in April, 2020 because of a significant reduction in Toll Lane use caused by the pandemic. And their CEO says commuters may never return to the roads. [https://www.smh.com.au/business/companies/commuters-may-never-return-to-the-roads-says-transurban-boss-20200622-p554wm.html?fbclid=IwAR1vhQZNSGdYewYfuuRjeXDHgcTLYfUQWwetr-a9lxJ1TN\\_xBeWg7dzpDRO](https://www.smh.com.au/business/companies/commuters-may-never-return-to-the-roads-says-transurban-boss-20200622-p554wm.html?fbclid=IwAR1vhQZNSGdYewYfuuRjeXDHgcTLYfUQWwetr-a9lxJ1TN_xBeWg7dzpDRO)
- The Transurban contract stipulates guaranteed profits, gives away private/state citizen land-rights for 80+ years, and Transurban needs even more state/federal monies including a reduction to 1.5% TIFFA financing.
- Transurban construction has been, and will continue to be, subsidized by taxpayer money and citizen tolls.
- Transurban's most recent announcement is to sell-off its share in the VA toll road project.

**17**

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- The financial validity of the project is highly questionable. The BOS and elected officials must enact their fiduciary responsibility and safeguard the citizens by not allowing VDOT to enter into such contracts until it merits are proven and transparent.

Comment  
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from  
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page

- Additionally, **HB1414 The 2020 Omnibus Transportation Bill**, law spells out clearly in several chapters the requirements for showing public benefit for private entities.

18

- Additionally, the project stands as a Concessionaire Enhancement, as stated by VDOT, May 20, 2019 Public Meeting. Yet:

- ARCA - Exhibit B1 - Project Description1a) (a) four new general-purpose traffic lanes (two lanes in each direction) to be constructed on the outer sides of the existing lanes of the Capital Beltway Corridor, where required due to the conversion of existing lanes as defined in (b) below, and all related improvements thereon to accommodate the Route 495 HOT Lanes in Virginia Project, beginning at the southern terminus in the vicinity of Backlick Road (Route 617) to the **northern project terminus in the vicinity of Route 738** (a distance of approximately 14 miles);
- The northern terminus is Route 738 or Old Dominion Drive where Transurban's legal boundaries for Express or HOT Lanes ends.
- ARCA Chapter 9 p. 67 - the contract says that Transurban can extend the HOT Lanes within the HOT Lanes Right of Way etc. I-495 NEXT is a stand-alone project because, it is outside of Transurban's HOT Lanes ROW.
- And, because it is outside, it has to be processed as a new, not a continuing project which is why (my interpretation) that the P3 Office

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Comment continued on next page

**18** The text in the Omnibus Bill that is either *Italicized* or crossed out is considered "new language" or eliminated language to the Code of Virginia. Various parts of the bill, particularly § 33.2-1803 (Approval by the responsible public entity) & § 33.2-1803.1 & :1 (FOPI/PSAC), *Virginia Passenger Rail Authority*, refer to the revised language. However, nothing changes for VDOT's approach in response to this Concessionaire Enhancement from what is included in the bill.

<https://lis.virginia.gov/cgi-bin/legp604.exe?201+ful+CHAP1230+pdf> (see pages 34-36)

**19** VDOT and Transurban are free to modify the existing 495 ARCA, by mutual agreement, to include the 495 NEXT enhancements, and that the 495 NEXT project need not be undertaken as a standalone project. It is well-established that, under the common law of Virginia, a written contract may be modified by express mutual agreement. See, e.g., *Amchem Prods., Inc. v. Asbestos Cases Plaintiffs*, 563 S.E.2d 739, 743—44 (Va. 2002). Furthermore, the 495 ARCA was awarded under the Public-Private Transportation Act of 1995 ("PPTA"), and the PPTA clearly anticipates contract modifications. For example, the PPTA includes a provision requiring mutually-agreed contract modifications to be memorialized in a written agreement. In addition, the language of the 495 ARCA plainly contemplates subsequent amendments and/or modifications, including modifications that extend the 495 HOT Lanes. Because changes to the original 495 project are anticipated both by the underlying ARCA and the PPTA, and because parties are free to modify existing contracts by express mutual agreement, VDOT and Transurban may make the modifications of the 495 HOT Lanes to include 495 NEXT through a contract modification, and without going through a competitive procurement process.

required Transurban to submit to the public benefit regulations of the PPTA.

- We believe the contract says limits all parties to the defined ROW, including expanding the lanes.
- Enhancement under the 2005 ARCA that doesn't have to comply with the 2013 PPTA Amendments.

*Comment continued from previous page*

### 5. VDOT has not adequately addressed the substantial adverse environmental impacts of the Project.

- No Alternative Build Scenarios are presented or studied.
- While there has been agency review and comment of environmental impacts, as required by the NEPA process, we feel that an EA, as opposed to the more thorough EIS, fails to adequately and completely address the environmental impacts of the project, particularly on air quality, storm water management, public water supply, historic properties, protected parklands, wetlands, and streams, tree canopy loss, flyover noise, and neighborhoods quality of life.
- For example, it appears that 2 additional ramps were added 2 weeks prior to the March 12, 2020 "meeting/hearing," ramps that would link 495 to GWP Areas/Connections, and that there are no Noise Studies completed for the EA for these Flyover Ramps/"Bridges." How will NOISE from Flyover Ramps/ Bridges for GW Areas be mitigated for the several neighborhoods as required? At several meetings VDOT experts indicated that with flyovers in relation to local topography it

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*Response provided on next page*

**20** VDOT, in coordination with FHWA, local governments, and stakeholders identified an alternative that would meet the project purpose and needs: reduce congestion, provide new travel choices, and improve travel reliability along I-495. The build alternative described in Section 2.2.2 of the Environmental Assessment (EA) was identified as the only reasonable alternative to advance based on the Purpose and Need for the study. For this alternative, VDOT considered a range of design options at several interchanges to meet the needs at those locations. The I-495 NEXT EA identified one build alternative in detail which is acceptable under FHWA's Technical Advisory T 6640.8A Guidance for Preparing and Processing Environmental and Section 4(f) Documents (FHWA, 1987). These decisions were presented to state and federal permitting agencies through project-specific agency meetings and coordination as the study developed. The Advisory states that "An EA does not need to evaluate in detail all reasonable alternatives for the project and may be prepared for one or more build alternatives." The single build alternative leaves ample flexibility for different designs to be considered when the project advances to permitting and more detailed phases of design following an FHWA NEPA decision.

I-495 NEXT project has independent utility since it would provide a usable facility and be a reasonable expenditure of funds even if no additional transportation improvements in the area are made, including to the ALMB.

**21** As noted on the FHWA website (<https://www.environment.fhwa.dot.gov/nepa/documentation.aspx>), "An Environmental Impact Statement (EIS) is prepared for projects where it is known that the action will have a significant effect on the environment. An Environmental Assessment (EA) is prepared for actions in which the significance of the environmental impacts is not clearly established." For the I-495 NEXT project, an EA was prepared because the significance of the environmental impact was not known prior to project initiation. The supporting technical studies and documentation in the technical reports are prepared to a level of detail that allows FHWA to make an informed decision on the path forward for the project, as well as to assess the level of impacts associated with each resource. Technical studies and reports are prepared in a level of detail such that they may be used to support an EA or an EIS.

The NEPA process for the project will be completed when FHWA issues a NEPA decision document. The EA was approved for public availability by FHWA on February 24, 2020. Following the Public Hearing and receipt of public and agency comment, VDOT has worked with FHWA to respond to substantive public comments and complete any additional analyses that are deemed necessary for the NEPA process. Following that effort, VDOT will request a NEPA decision from FHWA. If the results of these efforts do not identify any significant impacts, VDOT would request a Finding of No Significant Impact (FONSI) from FHWA. The FONSI would document FHWA's selected alternative and document the absence of significant impacts. The issuance of the FONSI would complete the NEPA process. On the other hand, if significant impacts are identified, FHWA and VDOT would need to initiate an Environmental Impact Statement (EIS) and continue the NEPA process.



would be impossible. If noise is not mitigated, these Flyover Ramps/ Bridges must be omitted from 495NEXT.

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Responses provided after next page

- Also, a total of 49 streams, 45 acres of wetlands, and 91 acres of 100-year floodplains associated with the three waterways are located in the study area. (P 3-8 Chart) And the EA notes that there are 89 properties that could be impacted by the project. Commonwealth of Virginia Law has no requirement for publicly identifying the location of or mitigating the impacts of temporary construction easements (staging areas) for transportation projects on adjacent or nearby properties. These impacts include tree removal, storm water management and erosion, and machine noise, and resulting air pollution.
- With the Build Alternative, there are approximately 29 acres across 50 properties that would be converted to public right-of way consistent with local plans to provide Express Lanes on I-495 and improve interchanges in the study area, and while property owners may already have been compensated, there is no requirement to evaluate environmental impact on these properties, including tree loss.
- A total of 3.21 acres of land in Scott's Run Nature Preserve will be impacted by the project: 1.20 acres are proposed for construction, and 2.01 acres are to be used for a temporary grading and construction easement. (ref P 22 sos Section 4f and 6d, p 164 in EA).
- There are potential adverse impacts to natural resources within Scott's Run watershed and potential changes to the outer limits of the Nature Preserve due to increased impervious areas. (ref EA 4-8)

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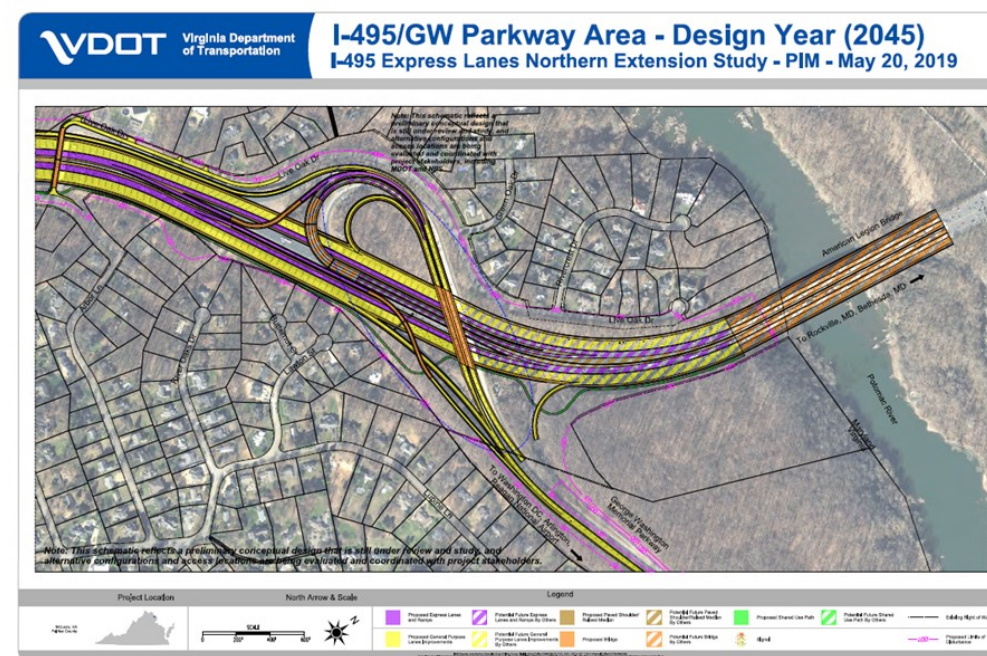
The statement indicating that new ramps were added to the George Washington Memorial Parkway (GWMP) interchange 2 weeks for the materials for the Public Hearing were made public is not correct. The configuration of the proposed interchange ramp connections has not been modified to show new ramps. As shown in the comparison below from the graphics shown at the May 2019 Public Information Meeting versus the graphics prepared for the 2020 Public Hearing, the interchange has the same number of proposed ramps and the same configuration. The only modification of note was that the alignment of the proposed ramp from the northbound I-495 Express Lanes to the eastbound GWMP was shifted slightly to the south in response to coordination with the National Park Service regarding the location of the ramp tie-in at their park boundary.

The *I-495 NEXT Noise Technical Report* (February 2020) was prepared based on preliminary designs as of Fall 2019, which were consistent with designs used for other impact calculations summarized in the February 2020 EA. A final noise analysis, which would be documented in a Final Design Highway Traffic Noise Report, would be conducted during the final design phase, and would incorporate any design revisions between the Fall 2019 preliminary design (as shown in the Public Hearings) and the final design.

Noise mitigation ("abatement") is determined using a three-phased approach. Phase 1 is to determine if highway traffic abatement consideration is warranted for the affected receptors. Phase 2 is to determine if a noise abatement measure is feasible, which requires consideration of both acoustical conditions (that 50% or more of impacted receptors experience 5 dB(A) or more of insertion loss is feasible) and engineering conditions (it is possible to design and construct the abatement measure). Phase 3 is to determine if a noise abatement measure is reasonable by meeting three criteria: to reduce noise by at least 7 dB(A) for at least one impacted receptor, to have an approved cost based on a minimum value of 1,600 square feet per benefitted receptor, and for 50% or more of benefitted residents and owners who respond to the outreach questionnaire to vote in favor of the noise abatement measure.

May 2019 Public Information Meeting Design Plan Board – Sheet 5:

[http://www.495northernextension.org/documents/pim052019/pim052019\\_07designyeardraft.pdf](http://www.495northernextension.org/documents/pim052019/pim052019_07designyeardraft.pdf)



Response continued on next page



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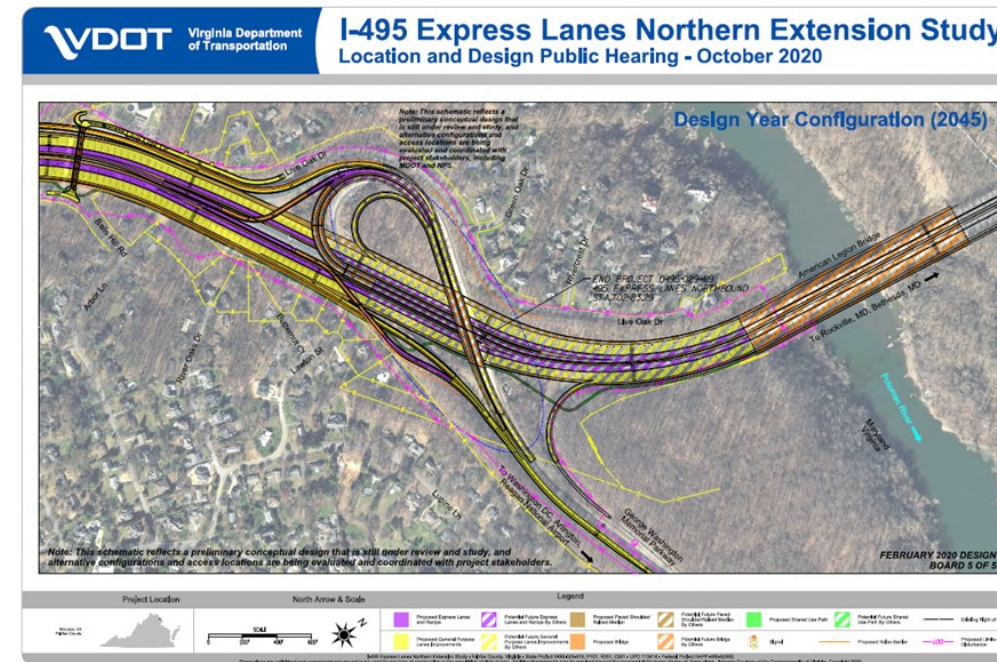
Responses provided on next page

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- With the Build Alternative, there are approximately 29 acres across 50 properties that would be converted to public right-of way consistent with local plans to provide Express Lanes on I-495 and improve interchanges in the study area, and while property owners may already have been compensated, there is no requirement to evaluate environmental impact on these properties, including tree loss.
- A total of 3.21 acres of land in Scott's Run Nature Preserve will be impacted by the project: 1.20 acres are proposed for construction, and 2.01 acres are to be used for a temporary grading and construction easement. (ref P 22 sos Section 4f and 6d, p 164 in EA).
- There are potential adverse impacts to natural resources within Scott's Run watershed and potential changes to the outer limits of the Nature Preserve due to increased impervious areas. (ref EA 4-8)

## 22 Continued

February 2020 Public Information Meeting Design Plan Board – Sheet 5:

[http://www.495northernextension.org/documents/pim102020/project\\_next\\_-\\_ph\\_boards\\_2020-10-02-2045.pdf](http://www.495northernextension.org/documents/pim102020/project_next_-_ph_boards_2020-10-02-2045.pdf)





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- With the Build Alternative, there are approximately 29 acres across 50 properties that would be converted to public right-of way consistent with local plans to provide Express Lanes on I-495 and improve interchanges in the study area, and while property owners may already have been compensated, there is no requirement to evaluate environmental impact on these properties, including tree loss.
- A total of 3.21 acres of land in Scott's Run Nature Preserve will be impacted by the project: 1.20 acres are proposed for construction, and 2.01 acres are to be used for a temporary grading and construction easement. (ref P 22 sos Section 4f and 6d, p 164 in EA).
- There are potential adverse impacts to natural resources within Scott's Run watershed and potential changes to the outer limits of the Nature Preserve due to increased impervious areas. (ref EA 4-8)

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Response provided on next page

**23** Impacts to jurisdictional wetlands and waters of the US (WOUS), including those resulting from temporary construction easements, will be included in the Section 404 permit application submitted to the US Corps of Engineers and the Section 401 permit application submitted to the Virginia Department of Environmental Quality. If the project would result in impacts that would raise the 100-year floodplain elevation, a Letter of Map Amendment or Revision (LOMR) would be submitted to the Federal Emergency Management Agency (FEMA); the LOMR would include both permanent and temporary construction easements that would increase the 100-year floodplain elevation.

**24** All anticipated impacts have been calculated and summarized in the EA, including impacts within private properties and within the existing public right-of-way. These impacts include stream and wetland impacts, loss of trees and habitat, and floodplain impacts. Details on the specific types of impacts for various type of land cover are provided in the *I-495 NEXT Natural Resources Technical Report*.

**25** Scott's Run Nature Preserve was developed with money from the Land and Water Conservation Fund, and therefore is afforded additional protection under Section 6(f) of the Land and Water Conservation Fund of 1965 (Public Law 88-578). Mitigation measures within Scott's Run Nature Preserve are summarized in Appendix A of the EA, and include the following:

- Avoid impacts to the recreational use of the property
- Stabilize areas of land disturbance using a native seed mix as specified by Fairfax County Park Authority
- Minimize potential encroachment by staying within utility easement to the extent possible
- Include connections between the Preserve and the proposed 3.1-mile, 10-foot-wide shared use path, consistent with the County's Trails Plan Map

Additional mitigation measures developed through ongoing coordination with FCPA are included in the Revised EA.

Section 6(f) land replacement has been identified through with the FCPA, the Virginia Department of Conservation and Recreation (VDCR), and the National Park Service-Department of the Interior (NPS-DOI). The replacement land parcel is located at the corner of Balls Hill Road and Georgetown Pike and is approximately 1.48 acres in size. Currently, the parcel is owned by VDOT, used as an unpaved maintenance staging area with access provided off of Balls Hill Road. VDOT proposes to transfer ownership of the parcel to the FCPA for future use as additional parking for individuals visiting the Scott's Run Nature Preserve. (FCPA had indicated that the existing east parking lot frequently overflows during high demand, with visitors parking along the side of Georgetown Pike.)

would be impossible. If noise is not mitigated, these Flyover Ramps/ Bridges must be omitted from 495NEXT.

- Also, a total of 49 streams, 45 acres of wetlands, and 91 acres of 100-year floodplains associated with the three waterways are located in the study area. (P 3-8 Chart) And the EA notes that there are 89 properties that could be impacted by the project. Commonwealth of Virginia Law has no requirement for publicly identifying the location of or mitigating the impacts of temporary construction easements (staging areas) for transportation projects on adjacent or nearby properties. These impacts include tree removal, storm water management and erosion, and machine noise, and resulting air pollution.
- With the Build Alternative, there are approximately 29 acres across 50 properties that would be converted to public right-of way consistent with local plans to provide Express Lanes on I-495 and improve interchanges in the study area, and while property owners may already have been compensated, there is no requirement to evaluate environmental impact on these properties, including tree loss.
- A total of 3.21 acres of land in Scott's Run Nature Preserve will be impacted by the project: 1.20 acres are proposed for construction, and 2.01 acres are to be used for a temporary grading and construction easement. (ref P 22 sos Section 4f and 6d, p 164 in EA).
- There are potential adverse impacts to natural resources within Scott's Run watershed and potential changes to the outer limits of the Nature Preserve due to increased impervious areas. (ref EA 4-8)

**26** Watershed Impacts: The study area lies within the Middle Potomac-Catoctin watershed, and is within the Potomac River-Difficult Run subwatershed and the Potomac River-Nicholas Run-Scott Run subwatershed. During final design and permitting, the impacts to streams and wetlands would be avoided and minimized to the greatest extent practicable through strategies such as bridging, minor alignment shifts in localized areas to avoid lateral encroachments, and adjustments in construction means and methods to reduce the length of permanent and temporary stream impacts. Potential compensatory mitigation credits have been identified, as noted in Table 3-8 of the EA. Impacts and potential mitigation measures will continue to be refined through final design and coordination with permitting agencies.

Scott's Run Nature Preserve Impacts: The project is anticipated to result in approximately 1.10 acres of permanent impact on Scott's Run Nature Preserve and 3.01 acres of temporary easement within (a worst-case estimate based on the current Limits of Disturbance). Scott's Run Nature Preserve was developed with money from the Land and Water Conservation Fund Act of 1965, and therefore is afforded additional protection under 6 (f) of the Act. Under the I-495 NEXT Project's Build Alternative, a conversion of Section 6(f) land is anticipated to occur. The 3.01 acres of land requiring a temporary easement would be subject to a temporary conversion to a non-recreational use lasting less than six months. The remaining 1.10 acres that would be permanently impacted would require replacement in accordance with Section 6(f).

Land that would be permanently converted from the Scott's Run Nature Preserve abuts existing I-495 right-of-way and is currently wooded with no pedestrian or recreational use. Therefore, no changes to the current trail network configuration within the Preserve are anticipated. Minor changes in noise levels and visual quality could occur. Access to the Preserve would not be impacted by the proposed project and will remain as it currently exists.

A search of available replacement land near the existing Scott's Run Nature Preserve has been conducted to identify Section 6(f) replacement property. Potential replacement land has been identified at the corner of Balls Hill Road and Georgetown Pike and is approximately 1.48 acres in size. Currently, the parcel is owned by VDOT, used as an unpaved maintenance staging area with access provided off of Balls Hill Road. VDOT proposes to transfer ownership of the parcel to the FCPA for future use as additional parking for individuals visiting the Scott's Run Nature Preserve. During the coordination process, FCPA had indicated that the existing east parking lot frequently overflows during high demand, with visitors parking along the side of Georgetown Pike. The transfer of ownership of the property would occur as part of the I-495 NEXT project, and the construction of improvements on the property to create a parking lot and supporting infrastructure (drainage, sidewalks, etc.) would be performed by others. Sidewalk connections along Georgetown Pike, proposed as part of the I-495 NEXT Build Alternative, will connect the parking lot directly to the Scott's Run Nature Preserve east entrance.

Prior to the transfer of ownership from VDOT to the FCPA, VDCR and NPS must both agree that the replacement land is adequate for permanent impacts related to the Scott's Run Nature Preserve. This process is on-going and will be completed following the NEPA decision document.



• Under Environmental Resources, the EA report is silent on total number of treed acres within the Limits of Disturbance (LOD) and on private property that would be converted to public ROW. (ref Table 3-1 p 3-3)

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• Adverse health impacts include potential risk to water. While the Virginia Department of Health Office of Drinking Water notes that there are no surface water intakes within a 5-mile radius of the project area and that there are “no apparent impacts to public drinking water sources due to the project, “Fairfax Water noted the potential for contamination of public water supply [that] include spills from vehicles using the highway and application of de-icing chemicals, indicating a potential threat to McLean’s drinking water, and Virginia Department of Environmental Quality (DEQ) Division of Land Protection and Revitalization (DLPR) recommended further evaluation of the risks to water resources associated with 21 petroleum releases within the project area, and further evaluation of the potential health risks to the drinking water supply resulting from the project must be identified and recommended by Fairfax Water and DEQ DLPR.

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• Adverse health impacts include potential risk to air. The Air Quality Analysis conducted for the EA acknowledged possible temporary increases in emissions during construction and does not include (1) a health risk assessment of the impacts of the proposed project on the residential neighborhoods surrounding the proposed project, and (2) air quality impacts of potential increased truck traffic.

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• The public must be provided with a proposed mitigation plan for any such risks, and opportunity to comment on such plan, despite the lack of enforceable legal commitments to mitigate and remediate these impacts.

- 80% of the damage will have to be offset with credits

Response provided on next page

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**27** Section 3.15.2 of the EA states “There would be approximately 118 acres of tree clearing associated with the construction of the project due to the widening of the roadway, ramps and interchange re-configurations, noise walls, stormwater management facilities, and all other appurtenant structures.” Habitat that would be affected by the project is primarily edge habitat along the highway in the right-of-way, in interchange loops, and the area in the median. Culverts connecting streams under roadways offer limited passage, and the habitat fragments result in low quality edge habitat. Habitat in these areas also is typically poor quality due to access restrictions posed by the travel lanes. Increasing the width of the roadway corridor would not likely increase habitat fragmentation as forested land would not be newly separated from contiguous forest. A revegetation plan would be developed, following FHWA’s NEPA decision, during final design to identify replacement vegetation locations and types where feasible following construction.

**28** The hazardous materials study conducted for the project identified four Moderate Priority sites and two High Priority sites within the Limit of Disturbance (LOD). Further assessment of Moderate and High Priority sites and the correlation to the final design limits of disturbance would be conducted during the final design phase including applicable environmental site assessments for hazardous materials.

**29** For the air quality analysis, and specifically for carbon monoxide (CO), the study evaluated the “worst-case” locations in the project corridor. If the study shows that the project would not violate the air quality standard at the “worst-case” locations in the project corridor, then it can be assumed that the project would not violate the air quality standard anywhere else within the project corridor. Therefore, only worst-case locations were evaluated, which were chosen based on having worst-case traffic volumes, level of service, and/or delay. The modeling analysis also included numerous “worst-case” assumptions, including receptor locations along the right-of-way edge, and fully loaded roadway volumes for all lanes, which greatly exceeds forecasted traffic volumes. Even with all these worst-case assumptions, the analysis found that the project would not cause or contribute to a violation of the CO standard.

The worst-case intersections evaluated were:

- Route 123 and Tysons Boulevard
- Route 123 and Capital One Tower Drive/Old Meadow Drive
- Route 123 and Scotts Crossing Blvd/Colshire Drive

The worst-case interchange evaluated was:

- I-495 and Dulles Toll Road

The Environmental Protection Agency (EPA) performs health risk assessments when they set air quality standards. The air quality study demonstrated that the I-495 NEXT project would meet EPA’s air quality standards at the worst-case locations in the corridor. Therefore, the conclusion is that the health risk is minimal everywhere in the corridor as well. More detail on the air quality analysis is in the I-495 NEXT Air Quality Report.

The air quality analysis utilizes the 2045 I-495 NEXT traffic forecast volumes, which projects traffic volumes for all vehicles, including trucks, in both the general purpose lanes and Express Lanes.

- No noise studies for flyovers have been undertaken
- MD DEIS shows greater environmental harm than the VDOT (inadequate) EA has shown, including cancerous silica dust that will poison Parks, schools, churches, residents, hikers, Langley Club, et al
- VDOT has stated it does not meet water quality; this is the Potomac Watershed
- Far too numerous environmental, health, social justice issues have been noted in BOS letter, Public Commentary, MCA Letter, among many others (and too numerous to include here)
- We require additional Build Alternatives. Agencies and citizens have questioned why there hasn't been a 2nd build alternative as mandated, and have requested such.
- Officials have indicated that the Secretary of Transportation states "nothing is off the table" A true 2nd Build Alternative should be undertaken for the betterment of the project, and the community. Why not get it right?

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- Finally, Maryland's more in-depth DEIS has demonstrated that this project will throw off significant silica dust. With the proximity to parks filled with hikers, several local schools and playgrounds, Scott's Run Nature Preserve, Langley Swim and Tennis Club, and surrounding neighborhoods, it is alarmingly dangerous that no consideration was given to citizen health in VDOT's inadequate EA. We petition the BOS and elected officials to demand an EIS immediately.

31

**6. VDOT has not provided adequate due process (procedurally and legally) to the community given the very limited number of public hearings, inadequate**

*Response provided on next page*

*Comment continued on next page*

**30** Further studies will be conducted during the final design phase, as noted in the EA. Mitigation will be identified for each applicable resource as part of the permitting process. The comparison of impacts from the Maryland I-495 Managed Lanes project identified in the Draft Environmental Impact Statement (DEIS) versus the impacts identified in the I-495 NEXT EA are not appropriate because they are two distinct projects of differing size, scope, and area of impact. The number of build alternatives considered for I-495 NEXT has been addressed in Comment Response #20 above.

**31** The Occupational Safety and Health Administration (OSHA) has published a silica fact sheet (<https://www.osha.gov/Publications/OSHA3681.pdf>) consistent with standard 29 CFR 1926.1153 (<https://www.osha.gov/silica/SilicaConstructionRegText.pdf>). Table 1 in 29 CFR 1926.1153 provides effective dust control methods for a list of 18 common construction tasks. The OSHA fact sheet lists alternative exposure control methods for employers who do not fully implement the control methods on Table 1 of 29 CFR 1926.1153.

The I-495 NEXT project will follow all state and federal regulations, including on-site regulations for workers related to silica dust. With these measures in place, it is not expected that silica dust would migrate to areas where the public frequents, including adjacent residential areas. All construction activities would be required to adhere to VDEQ's fugitive dust regulation (9 VAC 5-50, Article 1, et seq.), which would have the effect of minimizing all fugitive construction dust, including silica. Mitigation measures to be used during construction could include:

- Use water trucks to minimize dust
- Cover trucks when hauling soil, stone, and debris
- Minimize land disturbance
- Use dust suppressants if environmentally acceptable
- Stabilize or cover stockpiles
- Construct stabilized construction entrances per construction standard specifications
- Regularly sweep all paved areas including public roads
- Stabilize onsite haul roads using stone
- Temporarily stabilize disturbed areas per VDOT erosion and sediment standards



**information made available to the public and pressure on all constituencies, including the BOS, to approve the Project.**

- The Project has been devoid of required public information, outreach and transparency. Citizens have requested meeting, studies, data all unanswered. The VDOT May 20, 2019 (transcript available) was contentious and left many unanswered questions. The next meeting proposed in March 2020 was designated a hearing, and only after outrage was the meeting postponed on the morning of as people threatened to attend in spite of being exposed to Covid-19. The atmosphere around the Project rising to the level of absurd. The list goes on and on (extensive documentation available). Top line points from the BOS Transportation Meeting (11/10/20) meeting illuminate this lack of information and transparency:

32

- When asked what was plan B, there was a long pause...finally the senior VDOT official stated there was none. When asked was there any reason why this project should move ahead before Maryland, there was "independent utility." When asked why there was a rush to move forward, there was no answer. When Chairman McKay asked "Is there any harm if we put this project on hold"....silence came over the room. VDOT leadership and staff looked at each other, and the Transurban lobbyist, suggesting that they would "have to look into that and come back with answers." Chairman McKay graciously deferred.

33

- To date, VDOT has not met neither the Governance Document – Public Involvement, nor the P3 Public Involvement Manual
- 30,000 households in Greater McLean Community, 168 HOA

Responses  
provided  
on next  
page

**32** VDOT has held three public meetings, two question and answer sessions for the general public, two public hearings, 23 meetings with elected officials, 109 meetings with stakeholders and agencies, 22 meetings with homeowners and business associations, and 22 one-on-one meetings with property owners. Prior to public involvement meetings, VDOT advertised the meetings in local newspapers, as well as on social media, and project notification postcards were sent out in the mail to over eight thousand households in Fairfax County, as well as to citizens via mass e-mail distributions. The Public Hearings held on October 5 and 8, 2020, provided both in-person, as well as virtual opportunities for the public to engage in the process. Prior to the Public Hearings, VDOT held two Public Information Meetings / Question-&-Answer Sessions virtually with the public. In addition, the materials have been available online and in hard copy in several locations since February 2020, and the project team has been available for questions and comments via phone throughout the planning and design process. VDOT has been proactive in its engagement with the public through meetings, as described above, with numerous local citizen groups and residential organizations. VDOT is continuing to meet with HOAs on a regular basis to provide updates and provide opportunities for additional input and dialogue. Additionally, VDOT is committed to continuing to engage with the community through the final design and construction phases. These public involvement opportunities exceed both FHWA and VDOT policy for this type of NEPA study.

**33** Chapter 1 of the EA documents the Purpose and Need for the study and the analysis included in the EA and supporting technical reports illustrate how the Build Alternative is needed and would benefit the study area prior to the construction of the Maryland project. These benefits to the Virginia study area roadway network include an overall increase in person throughput resulting from additional capacity, providing new travel choices, improved arterial operations resulting from a shift in travel demand off of congested arterials, travel time reductions in the southbound direction of I-495, improved safety on residential streets and the general purpose lanes, and a decrease in traffic delays on local and neighborhood roads, especially at intersections. Although VDOT has identified potential future operational degradation in the northbound General Purpose Lanes prior to the widening of the American Legion Bridge, VDOT is working on development and evaluation of a range of mitigation options to be put in place until the American Legion Bridge is widened. VDOT also continues to work in coordination with MDOT to move the American Legion Bridge widening forward. MDOT has selected a Phase 1 Project Developer for advancing their separate project, and anticipates entering into an agreement with the selected concessionaire team in 2021. Details on these benefits are in Chapters 2 and 3 of the EA, and in the *I-495 Traffic and Transportation Technical Report*.

**information made available to the public and pressure on all constituencies, including the BOS, to approve the Project.**

*Responses provided on previous page*

- The Project has been devoid of required public information, outreach and transparency. Citizens have requested meeting, studies, data all unanswered. The VDOT May 20, 2019 (transcript available) was contentious and left many unanswered questions. The next meeting proposed in March 2020 was designated a hearing, and only after outrage was the meeting postponed on the morning of as people threatened to attend in spite of being exposed to Covid-19. The atmosphere around the Project rising to the level of absurd. The list goes on and on (extensive documentation available). Top line points from the BOS Transportation Meeting (11/10/20) meeting illuminate this lack of information and transparency:
- When asked what was plan B, there was a long pause...finally the senior VDOT official stated there was none. When asked was there any reason why this project should move ahead before Maryland, there was "independent utility." When asked why there was a rush to move forward, there was no answer. When Chairman McKay asked "Is there any harm if we put this project on hold"...silence came over the room. VDOT leadership and staff looked at each other, and the Transurban lobbyist, suggesting that they would "have to look into that and come back with answers." Chairman McKay graciously deferred.

- To date, VDOT has not met neither the Governance Document – Public Involvement, nor the P3 Public Involvement Manual
- 30,000 households in Greater McLean Community, 168 HOA

**34**

**34** VDOT's guiding document for public involvement in transportation projects is the VDOT Public Involvement Policy Manual for Public Participation in Transportation Projects. This policy is in accordance with Federal Regulation 23 CFR 771.111(h) and 23 USC 128, Section 33.2-208 of the Highway Laws of Virginia, Virginia Department of Transportation Policy Memorandum DPM 1-11 and shall apply to all proposed highway projects of VDOT, regardless of the system or funding involved. The FHWA has endorsed this policy for use on all Federal-aid highway projects. The policies and procedures explained in this manual are intended to give full opportunity for coordination and participation by the public before the final approval of highway locations and designs.

In accordance with this Public Involvement Manual, VDOT scheduled a public hearing on the environmental assessment (EA) and draft design plans for its 495 NEXT project on March 12, 2020. As required, information and materials related to the EA and design plans were made available to the public on February 26, 2020 (15 days prior to the originally scheduled hearing) on the 495 NEXT project website and as hard copies at designated public locations including VDOT's Northern Virginia District Office, Fairfax County's Department of Transportation, Fairfax County Supervisor Foust's Office, and at three nearby libraries (Dolley Madison Library, Great Falls Library, and Tysons-Pimmit Library).

Per VDOT's public involvement requirements, ads were placed to notify the public in advance of the originally-scheduled public hearing on March 12, 30 days prior to the scheduled hearing, and again five to twelve days prior. In addition, VDOT notified the public and directly-affected stakeholders, elected officials, and local media outlets of the public hearings and availability of information, 30 days in advance of the public hearings, through other required methods including direct mail postcards; letters; notices posted in the local courthouse, libraries and governmental offices; press releases; email blasts; and information on the project and VDOT websites. Additional outreach efforts, which exceed VDOT's requirements, included sending notifications via multiple email blasts, distributing additional press releases, and sharing information on VDOT's social media channels including Twitter, Facebook and Instagram.

The March 12 hearing was cancelled and postponed due to the Covid-19 pandemic. Despite this postponement, the public was still invited to review the EA and design plans, and provide comments to be included in the public hearing comment record. With the exception of a brief period from approximately March 16 until July 13, when public buildings were closed due to COVID-19, hard copies of the EA and design plans could be accessed for public review. The EA and design plans remained available continuously on the project website. The formal comment period remained open.

In order to continue engaging with and seeking input from the public on the proposed 495 NEXT project, while complying with the restrictions that continued to exist in the Northern Virginia and greater Washington, D.C. region as a result of the Covid-19 pandemic, it was determined that VDOT would hold a virtual public hearing on October 5, 2020, followed by a small, by-appointment, in-person hearing on October 8, 2020. VDOT received concurrence and approval on the combined approach of a virtual and smaller, in-person hearing by VDOT's Central Office, as well as Federal Highway Administration.

*Response continued on next page*



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Response continued from previous page

**34 Continued**

In accordance with VDOT's Public Involvement Policy Manual, notification of the scheduled public hearing and the availability of EA and draft design plans took place through the required methods listed below. Many efforts exceeded VDOT standards, but are considered standard practice on megaprojects within Northern Virginia. Notifications included:

- Print ads in targeted local newspapers 30 days prior to the scheduled hearing and again five to twelve days prior.
- Direct mail postcards sent to 9,345 residential and business addresses within and near the study area 30 days in advance (Fourth project direct mail postcard since 2018.)
- Letters to federal and state agencies, agency partners, elected officials and key stakeholders 30 days prior to the public hearing.
- Notice posted in courthouses and other public places and buildings 30 days prior to the public hearing.
- Press releases and notices distributed to local media, elected officials, and project stakeholder list of more than 700 starting 30 days prior to the public hearing, and followed up by multiple reminders throughout the hearing process.
- Social media messaging on VDOT's Northern Virginia Twitter, reaching an audience of 38,353 subscribers.
- Geo-targeted paid ads and shared ads on VDOT Facebook and Instagram accounts reaching 36,223 people.
- Continued availability of the project's EA, and design plans and maps, on the project website

Prior to the two public hearings on October 5 and 8, 2020, VDOT hosted two virtual Question and Answer Sessions for the public. These sessions were intended to allow the public opportunities to listen to a presentation about the project, ask questions and provide input, and interact with project leadership and subject-matter experts. These sessions were not required, but were intended to provide additional outreach and information to the public in advance of the hearings.

The October 5 virtual public hearing was attended by more than 180 attendees, followed by 49 views of the hearing's video recording. The October 8 in-person hearing was held at nearby McLean Community Center, and was attended by 25 people. Both hearings provided formal presentations by VDOT staff, opportunities to provide verbal and written comments, and time for questions and answers.

VDOT extended the formal comment period from October 23, 2020 until December 4, 2020, allowing extra time for VDOT to engage with elected officials and surrounding communities to provide project information and seek input. Additional outreach included meetings with: elected officials, individual property owners, agency partners, homeowners or community associations, and briefings to industry groups. More than 700 public comments were received as part of the public hearing formal comment period, showing extensive interest and awareness from the public.

**35** In addition to the three public information meetings held by VDOT for the project, as well as two question and answer sessions for the general public, two public hearings, 23 meetings with elected officials, and 109 meetings with stakeholders and agencies, VDOT has held 22 meetings with homeowners and business associations, and 22 one-on-one meetings with property owners. The Public Hearings held on October 5 and 8, 2020, provided both in-person, as well as virtual opportunities for the public to engage in the process. Prior to the Public Hearings, VDOT held two Public Information Meetings / Question-&-Answer Sessions virtually with the public. In addition, the materials have been available online and in hard copy in several locations since February 2020, and the project team has been available for questions and comments via phone throughout the planning and design process. VDOT has been proactive in its engagement with the public through meetings, as described above, with numerous local citizen groups and residential organizations. VDOT is continuing to meet with HOAs on a regular basis to provide updates and provide opportunities for additional input and dialogue. Additionally, VDOT is committed to continuing to engage with the community through the final design and construction phases.

VDOT kicked off project outreach with two, large-scale, public information meetings held on June 11, 2018 and May 20, 2019, attended by approximately 76 people and 225 people respectively. VDOT held two virtual question and answer sessions, with the first session on September 28, 2020 (96 attendees and 214 views of recorded video), and the second session on September 30, 2020 (67 attendees and 103 views of recorded video). Following these question and answer sessions, VDOT held the Location and Design Public Hearing for the project in a virtual format on October 5, 2020 (more than 180 attendees and 49 views of recorded video), as well as an in-person, by -appointment-only, public hearing on October 8, 2020 at nearby McLean Community Center (25 attendees). VDOT also participated with Virginia's Department of Rail and Public Transportation in a virtual public meeting on November 18, 2020 to share the preliminary findings of the separate transit study, further discuss the 495 NEXT project, and answer questions about these efforts (about 87 people participated or viewed the meeting).

An extended deadline of December 4, 2020 for public hearing comments far exceeded the normal federally-required 30-day public comment period on projects for which an Environmental Assessment is prepared, and allowed VDOT and its local agency partners to continue to engage with and gather valuable input from members of directly-affected communities.

VDOT is continuing to meet with local communities and neighborhoods on a regular basis to provide updates and provide opportunities for additional input and dialogue. Additionally, VDOT is committed to continuing to engage with these communities through the project's final design and construction phases. These public involvement opportunities exceed both FHWA and VDOT policy for this type of environmental study.

- VDOT advises 9,000 post cards set out for Public Hearing, has had 21 individual meetings, and only begun direct outreach to impacted HOAs in October, after the Public Hearing
- Oct to date, has met with only 2 of the immediately impacted 20 HOAs and Civic Associations
- Approximately only 100 citizens have attended virtually meetings due to lack of awareness, for example and comparison:
- Two virtual meetings were added September 22, for the 28th and 30th, not meeting the criteria for proper notification and public transparency. One meeting was scheduled on a religious holiday suggesting a rush to hold these meeting before the scheduled public hearing
- 5 projects that were advertised in the Local Living Section, The Washington Post, Thursday October 1, 2020.
  - Loudon County Metrorail Bicycle & Pedestrian Improvements, 10/22 information meeting
  - Shreve Road Corridor Study, 10/7 information meeting
  - Springvale Road Over Piney Run Bridge Replacement, 10/21 information meeting
  - Boundary Channel Drive at I-395 Interchange Improvements, 11/5 design public hearing
  - Proposed Limited Access Control Changes I-95 Express Lanes Fredericksburg Extension, Public Notice Willingness for Public Comment
  - The 495Next Public Hearing, the largest transportation project in a decade was woefully missing from key announcements

**35**

*Responses provided on next page*



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Responses provided on next page

**36** More than 340 people are confirmed to have attended the virtual meetings hosted by VDOT for the 495 NEXT project, and more than 365 views are confirmed of the recorded videos of these meetings. The virtual format was instituted in response to Covid-19 safety restrictions that eliminated and/or vastly limited in-person gatherings; however, this format resulted in VDOT reaching a significant number of people and expanding its reach to individuals who previously may not have been able to attend in-person meetings. The number of people reached by the virtual meetings held for the 495 NEXT project are:

- Virtual Question and Answer Session on September 28, 2020: 96 attendees and 214 views of recorded video
- Virtual Question and Answer Session on September 30, 2020: 67 attendees and 103 views of recorded video
- Virtual Public Hearing on October 5, 2020: More than 180 attendees and 49 views of recorded video

In addition, since March 2020 when Covid-19 restrictions began, VDOT has participated virtually in 13 meetings with directly-affected community groups including homeowners' associations, citizen's groups, and neighborhoods.

**37** VDOT hosted two virtual question and answer sessions on September 28 and September 30, in an effort to provide two additional opportunities for the public to ask questions about the I-495 Express Lanes Northern Extension (495 NEXT) Project in advance of public hearings scheduled in October 2020. These informal sessions, which first were announced on September 22, 2020, provided individuals with a structured opportunity to hear a presentation, ask questions, and interact with project leaders and subject-matter experts. These sessions were not required by VDOT's Governance Document: *Public Involvement Policy Manual for Public Participation in Transportation Projects*, but were held in an effort to supplement other public outreach efforts, and provide added opportunities for the public to obtain information and ask questions in advance of the public hearings scheduled for October 5 and October 8, 2020.

VDOT worked diligently to notify the public about these sessions by distributing multiple email blasts to a stakeholder list of more than 700 people. Notices were emailed on September 22 with 42 percent of recipients opening the notice; September 25 with 38 percent of recipients opening the notice, and September 30 with 36 percent of recipients opening the notice (Note: Average open rates for email marketing is about 18 percent). Additionally, notices of the question and answer sessions were tweeted through VDOT's Northern Virginia Twitter account, reaching 38.2K followers, and then retweeted by local officials and partners. VDOT also sponsored ads on its Facebook and Instagram accounts, and ran paid Facebook ads that were geographically targeted to affected zip codes.

Two meetings were held because VDOT wanted to give the public the opportunity to attend at least one of the question and answer sessions, recognizing that some attendees may be unable to participate immediately after the religious holiday on September 28, 2020.

**38** Announcements regarding the 495 NEXT Location and Design Public Hearing, and availability of the Environmental Assessment and draft design plans, were published in targeted local newspapers 30 days ahead, and again five to twelve days ahead, of the scheduled hearings. The timing of these announcements are in accordance with VDOT’s Governance Document: *Public Involvement Policy Manual for Public Participation in Transportation Projects*.

Advertisements were placed in the following print publications on the dates indicated below to notify the public in advance of the virtual public hearing on October 5, 2020, and the in-person public hearing on October 8, 2020.

Publications	Dates
Connection – Fairfax County North edition (publishes Wednesdays)	9/2, 9/16
Washington Post – VA Local Living (Thursdays)	9/3, 9/17
El Tiempo Latino (Fridays)	9/4, 9/18

Advertisements were also placed to notify the public in advance of the originally-scheduled public hearing on March 12, 2020, which was subsequently postponed due to Covid-19 pandemic safety restrictions. Ads were placed in the following print publications on the dates indicated below.

Publications	Dates
Connection – McLean edition (publishes Wednesdays)	2/5, 2/26
Washington Post – VA Local Living (Thursdays)	2/6, 2/20
El Tiempo Latino (Fridays)	2/7, 2/21

In addition to print advertisements, VDOT notified the public and directly-affected stakeholders, elected officials, and local media outlets of the public hearings and availability of information, 30 days in advance of the public hearings, through other methods including direct mail postcards; letters; notices posted in the local courthouse, libraries and governmental offices; press releases; email blasts; and information on the project and VDOT websites. Notifications were reinforced through multiple email blasts, additional press releases, and information shared on VDOT’s social media channels including Twitter, Facebook and Instagram.

- VDOT advises 9,000 post cards set out for Public Hearing, has had 21 individual meetings, and only begun direct outreach to impacted HOAs in October, after the Public Hearing
- Oct to date, has met with only 2 of the immediately impacted 20 HOAs and Civic Associations
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Responses provided on previous pages

**38**



- May 20<sup>th</sup> 2019 meeting presented preliminary plans, a Fall meeting with more complete plans, studies was to be scheduled, the Fall 2019 Public Meeting was cancel right before the election. The next action moved immediately to a March Public Hearing - 2 weeks before, and then 1 week before plan changes were posted, flyover ramps, up/under/over

39

**7. The Financial Scenario around the project is secret and indicates that it will cost taxpayers in numerous ways, contrary to claims**

40

- The VDOT presentation from May 20, 2019 states that they have signed the agreement with Transurban to extend the 495 Express Lanes as a concessionaire's enhancement under the ARCA. As noted in our discussion, it was determined from a number of documents that the legal termination point of
- the 2005 ARCA is at Old Dominion Drive and the ARCA says with respect to concessionaire's enhancements, that they can proceed only in their own ROW. Therefore Transurban cannot build beyond Old Dominion Drive unless they do so as a stand-alone project which initiates the need to do the High Level Screening Report to show public benefit, as well as an Environmental Impact Study.
- Since the I-66 Express Lanes Project was required to go through a thorough public benefit study, it is surprising that VDOT or the P3
- Office did not require a similar study of the original I-495 Express Lane Project since the I-495 NEXT project is being proposed 15 years after the original agreement - if only to gauge if the project had lived up to its financial goals
- for the state before embarking on the construction of the I-495 NEXT project. To subject just a piece of the whole Virginia Beltway Express Lanes project to a public benefit study seems absurd when they should really be looking at the entirety.
- The original project was advertised as "no Commonwealth funding" as is this.
- The following is the financial breakdown of how the original project was funded. It was over 50% subsidized. And this is why questions should be asked about public benefit.

41

Responses provided on next page

**39** The statement indicating that changes were made one week before the March Public Hearing is not correct. The configuration of the proposed interchange ramp connections was not modified one week before the public hearing, per the previous comment response in Comment # 22 above.

Providing opportunities for the public to learn about and express their viewpoints about the proposed 495 NEXT project has been and continues to be a key priority to VDOT and its partnering agencies. VDOT's outreach efforts began with informing the public and stakeholders about the proposed project, while coordinating closely with partnering and coordinating agencies on the project's environmental study and development of preliminary design plans.

VDOT scheduled a Location and Design Public Hearing, in accordance with federal and state guidelines, for the 495 NEXT project. This hearing, which originally was scheduled for March 12, 2020, but later cancelled and postponed due to the Covid-19 pandemic, was intended to formally present and obtain public input on the project's Environmental Assessment findings and draft design plans.

The Environmental Assessment findings and draft design plans, on which the public was invited to formally provide input or comments, were not modified or changed after becoming available on February 26. An extended comment deadline of December 4, 2020, far exceeded the normal federally-required 30-day public comment period on projects for which an Environmental Assessment is prepared. More importantly, this extended period allowed VDOT and its local agency partners to continue to engage with and gather valuable input from the public on the proposed project.

**40** Because requested financial records approach and scenarios all contain VDOT's confidential valuation of aspects of 495 NEXT currently under negotiation, it would adversely affect VDOT's bargaining position if such information were made public at this time. (See, Va. Code § 2.2-3705.6(11)(a)).

**41** VDOT and Transurban are free to modify the existing 495 ARCA to include the 495 NEXT enhancements and that 495 NEXT need not be undertaken as a standalone project. It is well-established that, under the common law of Virginia, a written contract may be modified by express mutual agreement. *See, e.g., Amchem Prods., Inc. v. Asbestos Cases Plaintiffs*, 563 S.E.2d 739, 743—44 (Va. 2002). Furthermore, the 495 ARCA was awarded under the Public-Private Transportation Act of 1995 ("PPTA"), and the PPTA clearly anticipates contract modifications. For example, the PPTA includes a provision requiring mutually-agreed contract modifications to be memorialized in a written agreement. In addition, the language of the 495 ARCA plainly contemplates subsequent amendments and/or modifications, including modifications that extend the 495 HOT Lanes. Because changes to the original 495 project are anticipated both by the underlying ARCA and the PPTA, and because parties are free to modify existing contracts by express mutual agreement, VDOT and Transurban may make the modifications of the 495 HOT Lanes to include 495 NEXT through a contract modification, and without going through a competitive procurement process.

**42** The 495 NEXT Project is being developed as a Concessionaire Project Enhancement in accordance with the existing 495 Amended and Restated Comprehensive Agreement (the "ARCA") signed between VDOT and Capital Beltway Express, LLC (CBE). The ARCA, executed pursuant to the Public-Private Transportation Act of 1995, as amended ("PPTA"), provides for project enhancements and the process to carry forward such enhancements, as the 495 NEXT Project.

- May 20<sup>th</sup> 2019 meeting presented preliminary plans, a Fall meeting with more complete plans, studies was to be scheduled, the Fall 2019 Public Meeting was cancel right before the election. The next action moved immediately to a March Public Hearing - 2 weeks before, and then 1 week before plan changes were posted, flyover ramps, up/under/over

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- What exactly are we paying for with the forthcoming project? In addition to below framework, Susan Shaw has explained that Virginia is responsible for the maintenance of the HOT Lanes...Transurban collects revenue, and Virginia citizens pay through tolls, subsidies, and taxes to maintain Transurban's roads? And Transurban is utilizing the deal to dump their interest in
- \$589 million in Private Activity Bonds (state funds)
- \$589 million in TIFIA Loans (federal funds)
- \$409 million grant from the Commonwealth of Virginia (state fund)
- \$86 million from VDOT change-order funding (state funds)
- \$47 million in interest income
- \$348 million in private equity

43

**8. Current DRPT Transit Study with Maryland is currently on going...and should have happened before the EA.**

- This Transit Study went forward without citizen input and may be being backed into as the 2nd Build Alternative (as required by law) that is lacking in both the EA and the DEIS, and as robustly asked for by EPA, Army Corp, Parks, Department of the Navy (MD), et. al
- At the Nov BOS meeting, Rob Cary stated that the I-495 NEXXT Study & the Transit Study were tied closely and that the I-495 NEXT was dependent on those conclusions...after the public hearing?
- Insufficient time to study and give in put on this but immediate indications are that it has been rushed. For example, the major bus line/route that VDOT presented as "transit that will move more people because it would go Bethesda stop at Rt. 355 (Wisconsin Ave) then to Tysons" is actually not in place. According to MD DEIS there is no stop at, or planned at, Rt. 355.
- Metro, Busing just announced (today) heavy cutbacks (until 2022) and threatens transit. Without buses, even more GP lane traffic will result

44

**9. There has been inadequate Public Outreach, Procedurally**

45

**43** VDOT would not be responsible for the maintenance of the HOT Lanes. If the final proposal from Transurban is acceptable to VDOT, Transurban would then be responsible for design, construction, finance, operations and maintenance of the Express Lanes.

**44** Under a separate but parallel study being coordinated with VDOT, The Virginia Department of Rail and Public Transportation is conducting the I-495 American Legion Bridge Transit and TDM Study in coordination with the Maryland Department of Transportation's Maryland Transit Administration (MTA). The recommendations resulting from this separate study are aimed to work in concert with Virginia's proposed northern extension of the I-495 Express Lanes and Maryland's separately proposed managed lanes program for the American Legion Bridge, I-495, and I-270. Study information is available at <http://drpt.virginia.gov/transit/major-initiatives/i-495american-legion-bridge-transit-and-tdm-study/>.

The Virginia Department of Rail and Public Transportation (DRPT) held a virtual public meeting for the separate Transit and TDM Study at the Northern Virginia Transportation Authority (NVTA) on November 12, 2020. Additionally, DRPT gave a presentation to the Transportation Committee of the Fairfax County Board of Supervisors on December 8, 2020. The project team held a public meeting to discuss the findings and recommendations of the separate study on January 12, 2021. The Transit and TDM Study is expected to be completed in spring of 2021.

Because this study is a separate effort, the findings and recommendations from the Transit and TDM Study are not being included in the NEPA document. However, VDOT is reviewing the recommendations of the study to help develop a Transportation Management Plan (TMP) that would help improve traffic operations during construction. Based on the recommendations of the transit and TDM study, the TMP may include the implementation of a new route or new routes between Virginia and Maryland.

**45** See response to comment numbers 32 and 34.

- To date, VDOT has not met neither the Governance Document – Public Involvement, nor the P3 Public Involvement Manual
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For the reasons set forth above, and further detailed in the NOVA 495 Express Lanes Northern Extension White Paper, available upon request through email to [president@novacitizensassociation.org](mailto:president@novacitizensassociation.org), we oppose the current Project as it stands. Respectfully the Northern Virginia Citizens Association (NOVA Citizens Association) assert that the 495 Express Lanes Northern Extension Project should not go forward in its current form. Additionally, we assert that the project should be under independent review by the appropriate agencies and elected officials.

December 4, 2020

The Northern Virginia Citizens Association Board  
Executive Committee  
Members  
Debra Butler, President  
c/o 7012 Green Drive, McLean VA 22101

cc: Abraham Lerner, Virginia Department of Transportation  
Susan Shaw, Virginia Department of Transportation  
Allison Richter, Virginia Department of Transportation  
Jeff McKay, Fairfax County Board of Supervisors  
John Foust, Dranesville District  
Supervisor Barbara Favola, State Senator, 31st District  
Kathleen Murphy, State House of Representatives, 34th  
District Tom Biesiadny, Director, Fairfax County Department of  
Transportation Mary H. Hynes, Commonwealth Transportation Board  
Rob Carey, Virginia Department of Transportation  
Secretary Shannon Valentine, Virginia DOT  
Governor Ralph Northam, Commonwealth of Virginia



September 30, 2020

VDOT Northern Virginia District Office  
Attn: Abi Lerner, P.E.  
4975 Alliance Drive  
Fairfax, VA 22030

RE: 495 Express Lanes Northern Extension Project

Dear Mr. Lerner:

On behalf of the Northern Virginia Transportation Alliance's members and Board of Directors, I am writing today to express our strong support for the I-495 NEXT project.

This project is critical to Northern Virginia's transportation future. In addition to expanding travel capacity, creating new travel options, and relieving congestion at one of the area's worst bottlenecks, it is an essential component of an integrated express lanes network – one of this area's top long-range transportation priorities.

The Transportation Planning Board's regional express lanes network's performance analysis concluded that congestion managed lanes provide the greatest increase in regional transportation network reliability. The TPB then endorsed inclusion of the express lanes network in the region's long-range transportation plan – Visualize 2045.

Furthermore, the 495 NEXT Project will dramatically reduce congestion and delays for both managed lane users and the general-purpose lanes compared to the No Build option.

Expanding the region's HOT Lanes Network helps all modes of transportation in the 495 corridor. HOT Lanes incentivize more carpooling and transit ridership by dramatically increasing the reliability of both modes for free. To maximize this advantage, VDOT and MDOT are already studying bus rapid transit improvements using the new lanes. Additionally, this project's 3-mile shared use path will connect to local trails and greatly enhance bicycle and pedestrian travel.

At a time when our region is struggling to cope with the economic consequences of the COVID-19 pandemic, this 100% privately funded project will create thousands of new jobs and inject hundreds of millions of new dollars into our economy.

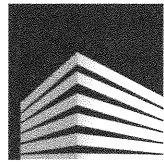
Now is the time to move forward with this regionally significant project that will benefit our transportation network, economy, and community for many years to come.

Sincerely,

A handwritten signature in black ink that reads "Jason Stanford". The signature is written in a cursive, flowing style.

Jason Stanford  
President  
Northern Virginia Transportation Alliance





PRINCE WILLIAM  
CHAMBER  
OF COMMERCE

March 11, 2020

9720 Capital Court ▪ Suite 203 ▪ Manassas, VA 20110 ▪ 703.368.6600

Abi Lerner, PE  
Virginia Department of Transportation  
4975 Alliance Drive  
Fairfax, Virginia 22030

Dear Mr. Abi:

On behalf of the Prince William Chamber of Commerce, I am writing to provide comments on the I-495 NEXT project. As you know, the 495 and 95 Express Lanes have been very successful in Northern Virginia and reduced commute times for thousands of Prince William County residents along the I-95 corridor.

It is important that we continue to develop a robust network of express lanes, and the Interstate 495 NEXT project is an important one for the Northern Virginia region. We encourage the Commonwealth to advance bold solutions like 495 NEXT. The project not only provides near term congestion relief and safety improvements to commuters on the Capital Beltway, but also lays the groundwork for a future connection to Maryland's Traffic Relief Plan. By connecting the 495 Express Lanes to the Dulles Toll Road and George Washington Memorial Parkway, motorists who choose the Express Lanes will see their commute times halved, allowing them to spend more time with their families.

Another important reason to support the 495 NEXT project is that it will allow the Commonwealth to continue to grow its economy while providing substantial quality of life improvements to residents at zero cost to taxpayers. Additionally, the project will add thousands of jobs to the Commonwealth and generate hundreds of millions of dollars in economic activity. This is an important project to maintaining the region's competitiveness, and must be advanced to remedy regional congestion.

Finally, the 495 NEXT project will provide further enhance transportation choices such as HOV service and transit along the corridor. This is important as our region continues to look to reduce greenhouse gas emissions and reduce the amount of cars on the roads.

The Prince William Chamber of Commerce endorses the I-495 NEXT project because it is critical for the Northern Virginia region. We encourage the approval of this project and hope the Commonwealth will move forward without delay. By approving this project, the Commonwealth could finally move forward with a project that has been delayed for many years.

Sincerely,

Deborah L. Jones, President & CEO  
Prince William Chamber of Commerce

SAIGON CITIZENS' ASSOCIATION  
7419 SPENCER COURT  
MCLEAN, VA 22102-21265

April 15, 2020

To: 495NorthernExtension@VDOT.virginia.gov  
From: Saigon Citizens' Association

Subj: Reference "I-495 Express Lanes Northern Extension Study"

We understand that April 15<sup>th</sup> is the last date to submit comments related to plans to extend the 495 Express Lanes by approximately three miles from the I-495 and Dulles Toll Road interchange to the vicinity of the American Legion Bridge and Maryland line.

The Saigon Citizens' Association sent the attached letter on June 19, 2019, expressing the community's concern regarding the encroachment of the new sound wall into our neighborhood after construction of the expanded Beltway. We send this second letter today at the request of a Saigon resident to support his latest letter on the same subject.

Requests:

1. Honor the promise conveyed by Abi Lerner that VDOT will "straighten out" the Beltway sound wall behind 987 Spencer Road rather than continue its current indented profile at that point. (See map at Attachment 1.) The properties at 987 and 989 Spencer Road are less than 150 feet from the current sound wall, and the residents wish to maintain as much distance as possible from the sound wall.
2. We question if building the trail in conjunction with the Beltway Expansion meets the standards for eminent domain specified in Virginia Code § 1-219.1. Limitations on eminent domain (Attachment 2). We question whether the installation of the paved trail was a requirement of VDOT or whether it was added by Fairfax County, and if the trail meets Virginia's definition of a park.
3. If the paved trail is peculiar to this neighborhood and the trail will not be built to parallel the entire three-mile stretch of expanded Beltway, then we request that you retain the small mulched trail that currently parallels the Beltway sound wall in their backyards rather than build a paved trail for the following reasons:
  - a. The neighborhood wishes to avoid ATVs, motorcycles, and electric bicycles from using a paved trail. The mulched trail allows current hikers to use the trail but does not invite extensive use, but a paved trail would invite vehicles. We wish to avoid the noise, maintain privacy and security, and prevent neighborhood burglaries by those who would use such vehicles to commit crimes.

**1** The preliminary noise wall plans indicate that the future noise wall is not anticipated to have the same indentation as the existing wall.

There is an existing noise barrier adjacent to this property. Portions of this existing barrier (including the portion in front of the noted homes) would be impacted by the project and therefore would need to be relocated to avoid conflict with the proposed additional lanes. The current location of the proposed noise barrier shown on the plans are considered preliminary. The noise barrier location and parameters would be finalized during the detailed design phase. VDOT would make every effort to 'straighten out' the relocated noise barrier and maximize the distance between the relocated barrier and the noted homes following the appropriate guidelines for noise barrier design.

**2** The paved trail is being constructed to make the project consistent with the trail facility included in the Fairfax County Comprehensive Plan. It is being constructed parallel to I-495 within the sections where the roadway project is being constructed.

**3** The paved trail is expected to be built along the entire section of I-495 within the study area.

b. Retention of the mulched trail would preserve expensive, beautiful, and sound insulating landscaping, such as tall oak and tulip poplar trees, flowering dogwood and cherry trees, and mature azaleas and rhododendron. This would preserve the beauty, privacy, and value of these properties. A paved trail would destroy the privacy of these properties since any trail user would stare directly into large windows of their houses. Felling a tall, mature tree is the very definition of irremediable damage because it cannot be replaced as it is.

4. If VDOT persists in building a paved trail, then we request that VDOT and its private partner provide the following exceptions for 987 and 989 Spencer Road:

a. Waive the right of way required by VDOT for the trail for 150 feet on either side of these properties.

4

b. Reduce the width of the planned ten-foot-wide paved asphalt trail to a width of six feet and reduce the cleared shoulders from seven feet on each side to three feet on each side. That would reduce the total cleared width of the trail and its shoulders from 24 to 12 feet and save valuable landscaping.

5

c. Just compensation for property taken for a trail is considered to be the difference of a property's value before the taking less what the value is after the taking. We request that the VDOT appraisers itemize the components of just compensation to include: the portion attributable to the land taken; land improvements taken; and residual damages in order to provide sufficient funds to restore privacy by building an 8-foot-tall wooden fence between the houses and the trail.

6

Thank you for your time and consideration.

Sincerely Yours,

Patricia Foley  
Secretary,  
Saigon Citizens' Association

Attachments:  
As Stated

CC:  
Dranesville Supervisor  
Saigon Citizens' Association Board of Directors  
Residents of 987, 989, and 1010 Spencer Road

4 Compensation would be negotiated with the property owners during the right-of-way phase of the project. In most cases, VDOT reaches an agreement with affected property owners. In those cases where agreement cannot be reached, the final compensation would be determined by the courts.

5 The 10-foot minimum pavement width standard helps ensure the safety of pedestrians and bicyclists using the shared-use path.

6 The amount of proper compensation will be negotiated with the property owners during the right-of-way phase of the project. In most cases, VDOT reaches an agreement with affected property owners. In those cases where agreement cannot be reached, the final compensation would be determined by the courts.





201 West Main Street, Suite 14  
 Charlottesville, VA 22902-5065  
 434-977-4090  
 Fax 434-977-1483  
 SouthernEnvironment.org

Mr. Abi Lerner, P.E.  
 VDOT Northern Virginia District  
 4975 Alliance Drive  
 Fairfax, VA 22030  
[495NorthernExtension@vdot.virginia.gov](mailto:495NorthernExtension@vdot.virginia.gov)

BY EMAIL

**Re: I-495 Express Lanes Northern Extension Project**

Dear Mr. Lerner,

The Southern Environmental Law Center (SELC) appreciates this opportunity to comment on the Virginia Department of Transportation’s (VDOT) Environmental Assessment (EA) and draft design plans for the I-495 Express Lanes Northern Extension project (495 NEXT). SELC is a non-partisan, non-profit organization that works throughout Virginia to promote transportation and land use decisions that strengthen our communities, protect our natural resources, and improve our quality of life.

We have previously provided written comments on this project in letters dated July 11, 2018 and June 10, 2019, both of which we are resubmitting with this letter for your reference. We appreciate the additional work VDOT has done over the past year to inform the EA, including providing more information about the shared-use path proposed as part of the project. However, we are disappointed by the ongoing lack of any commitment to invest in transit service along or near the project corridor as part of the project, as well as the continued limitation of the analysis to a single build alternative in the EA. Additionally, although we are glad to see that the EA includes at least a brief discussion of the project’s impact on greenhouse gas (GHG) emissions, one of the key, underlying assumptions that discussion relies upon needs to be revised so that it offers decision-makers and the public a more valid assessment of the potential impacts of this project. We also continue to have questions and concerns about the extent of stormwater treatment that is proposed, and those concerns are heightened by the EA’s insufficient analysis of the impacts the proposal would have on water quality in the Potomac River and other waters affected by runoff from this project.

Committing to a Direct Investment in Transit

Our prior comment letters have emphasized the importance of including significant funding for improving and expanding transit service through and near the project area as part of this proposal, and we are concerned that no such commitment has been made.

The EA points to the indirect transit-related benefits the project would provide by allowing transit vehicles to travel in the express lanes free of charge,<sup>1</sup> and we certainly acknowledge those benefits and the value they can provide. However, we believe the Commonwealth must do much more to advance transit *directly* with the HOT lane projects it is

<sup>1</sup> EA, 2-15.

**1** The proposed action would accommodate transit on I-495 by providing additional capacity for buses with new managed lanes in each direction. The Express Lanes would directly encourage carpooling and transit usage by providing reliable, faster, toll-free trips for transit HOV-3+ vehicles and buses. In a November 30, 2020 letter, the Virginia Secretary of Transportation Virginia statedd that Virginia is committed to providing dedicated, ongoing support for transit services along this corridor as part of the I-495 NEXT project, and committed to investing funding generated from toll revenues toward the benefit of the users of this corridor. This commitment creates the opportunity for future transit expansion along the corridor.

Details of the Secretary’s proposal would be developed in 2021. This would be addressed following VDOT’s request for a NEPA decision by Federal Highway Administration (FHWA).

In a separate but parallel study, the Virginia Department of Rail and Public Transportation (DRPT) and Maryland Transit Administration (MTA) are currently studying new transit options along the I-495 corridor to understand the potential for enhanced transit service in the corridor.

Overall, vehicle miles traveled in the 2045 Build scenario is anticipated to be lower than in the 2045 No Build scenario (see response 8 for more detail).

As documented in the *I-495 NEXT Indirect and Cumulative Effects Technical Report* and EA, proposed right-of-way acquisition would not change overall land use in the area, and the Build Alternative is not anticipated to encourage or accelerate land use changes that are not already expected by the localities within the study area. The corridor is highly developed, and the Build Alternative does not introduce new interchanges.

The transportation improvements would positively impact all communities, including those which contain low-income populations. Since the tolled lanes are being added and not converted from existing general-purpose use, the project is anticipated to benefit users of both the Express Lanes and general purpose lanes. Transit users along the corridor may experience additional benefits since local transit authorities would have the opportunity to provide reliable transit options, toll free, along the Express Lanes, which could not be provided under the No Build scenario.

**1**



pursuing in this region and other areas of the state—both to help counter these projects’ potential to increase vehicle miles traveled (VMT) and spur sprawl, and to address some of the significant equity concerns they raise.

To its credit, the Commonwealth has demonstrated the ability to structure HOT lane projects in ways that meaningfully advance transit. The two “Transform 66” HOT lane projects (Inside the Beltway and Outside the Beltway) both ensured significant investment of toll revenues into transit enhancements along and near I-66, and SELC strongly supported that investment. To date, however, the I-495 HOT lane projects have not coupled with any direct investment in transit, even though transit enhancements are sorely needed along and near the corridor.<sup>2</sup>

One of the public comment responses included in Appendix C to the EA notes that the Development Framework Agreement between VDOT and Transurban for this project “includes provisions where revenues beyond a certain threshold are shared with the state.”<sup>3</sup> We strongly urge the Commonwealth to include a clear and express commitment to dedicate a significant portion of any such “surplus” revenues toward enhancing transit service in and near the corridor as part of the 495 NEXT project.<sup>4</sup> Moreover, we urge the Commonwealth to include as part of this project a commitment to enhanced transit service benefitting the corridor even if “surplus” revenues are not realized. In either case, this could include financial support for the establishment of express bus service along the I-495 corridor, as well as for providing connections between key population centers in the corridor such as connecting the Silver and Red lines of the Metro system.

#### Evaluating a Broader Array of Build Alternatives

As expressed in our prior comment letters on this project, VDOT needs to evaluate more than a single build alternative. We have previously noted that we understand why VDOT might be predisposed toward simply extending the configuration of express lanes that is currently in place along the portion of I-495 to the immediate south of the project area (two express lanes in each direction). However, the National Environmental Policy Act (NEPA)<sup>5</sup> requires that a range of reasonable alternatives be considered in EAs,<sup>6</sup> and achieving design consistency with adjoining highway sections is not sufficient to justify including only one build alternative in the EA. Notably, in the summary of agency scoping responses provided in Section 4.2, the EA notes

<sup>2</sup> As pointed out on page 2-15 of the EA, no regional bus transit service is currently offered along I-495 through the study area and across the American Legion Memorial Bridge.

<sup>3</sup> EA, Appendix C (Responses to Comments Received), Response to Question/Comment #71.

<sup>4</sup> Another of the responses to public comments included in Appendix C notes that “VDOT will compare implementing this project under both public and private (P3) delivery methods and will determine which delivery method is in the best interests of the Commonwealth.” *Id.*, Response to Question/Comment 66. Regardless of whether the project proceeds as a P3 (either with Transurban or with another concessionaire) or as a public project, it should include a requirement to invest a significant portion of the tolling revenue into transit improvements.

<sup>5</sup> 42 U.S.C § 4321 *et seq.*

<sup>6</sup> Under section 102(2)(E) of NEPA, 42 U.S.C. §4332(2)(E), agencies must consider alternatives to the proposed action. The courts have interpreted this provision to require full and meaningful consideration of all reasonable alternatives, regardless of whether an EIS or an EA is being prepared. *See, e.g., Env’tl. Prot. Info. Ctr. v. United States Forest Serv.*, 234 Fed. Appx. 440, 442-43 (9th Cir. 2007); *Bob Marshall Alliance v. Hodel*, 852 F.2d 1223, 1228-29 (9th Cir. 1988).

See Comment 1 response on previous page for response to this comment

2

See Comment 1 response on previous page for response to this comment

3

**2** The Transform 66 Outside the Beltway project was the result of a joint-led tiered Environmental Impact Statement (EIS) between Federal Highway Administration (FHWA), VDOT, and the Virginia Department of Rail and Public Transportation (DRPT). The result of this collaboration was the ability for the study to make commitments to transit that are outside the purview of FHWA or VDOT. The I-66 Inside the Beltway Environmental Assessment (EA) was prepared after the EIS and these commitments, and therefore the commitments could be included in the EA. However, FHWA and VDOT did not approve the transit program through the associated National Environmental Policy Act (NEPA) documents. For the I-495 NEXT project, the Build Alternative analyzed in the EA does not preclude such decisions from being made within the study corridor, either during the planning and design phases of this project (by those with the purview to do so) or after project completion.

**3** VDOT, in coordination with FHWA, local governments, and stakeholders identified an alternative that would meet the project purpose and needs: reduce congestion, provide new travel choices, and improve travel reliability along I-495. The build alternative described in Section 2.2.2 of the Environmental Assessment was identified as the only reasonable alternative to advance based on the Purpose and Need for the study. For this alternative, VDOT considered a range of design options at several interchanges to meet the needs at those locations. The I-495 NEXT Environmental Assessment (EA) identified one build alternative in detail which is acceptable under FHWA’s Technical Advisory T 6640.8A *Guidance for Preparing and Processing Environmental and Section 4(f) Documents* (FHWA, 1987). These decisions were presented to state and federal permitting agencies through project-specific agency meetings and coordination as the study developed. The Advisory states that “An EA does not need to evaluate in detail all reasonable alternatives for the project and may be prepared for one or more build alternatives.” The single build alternative leaves ample flexibility for different designs to be considered when the project advances to permitting and more detailed phases of design following an FHWA NEPA decision.

The I-495 NEXT project does not include improvements to the ALMB, which would be constructed as part of Maryland’s separately proposed I-495 Managed Lane project. The Maryland Managed Lane project would provide access to the movements from GWMP to northbound I-495 Express and from southbound I-495 Express to GWMP. The I-495 NEXT project has independent utility since it would provide a usable facility and be a reasonable expenditure of funds even if no additional transportation improvements in the area are made, including to the ALMB.



that the Environmental Protection Agency (EPA) asserted that “the alternatives analysis should explain why only one build alternative is being evaluated.”<sup>7</sup>

This is not just an academic request. As noted in our June 10, 2019 comment letter, the data on peak period travel times provided as part of the preliminary traffic analysis information appeared to indicate considerably less need for additional capacity on I-495 in the southbound direction than in the northbound direction during the PM peak period. Traffic data now included in the EA points to a similar conclusion. The EA notes that, during the PM peak period, travel times in the Build condition along the southbound general purpose lanes between the American Legion Memorial Bridge and Route 123 remain “generally consistent” with travel times in the 2045 No Build condition, and that travel times on the southbound express lanes are only about one minute less than travel times on the general purpose lanes in the No Build condition.<sup>8</sup> Further, although AM peak period travel times along the southbound general purpose lanes decrease by approximately four minutes when compared to the 2045 No Build conditions, Figure 2-4 suggests that there is little to no difference south of Georgetown Pike.<sup>9</sup>

As a result, the need for two (or even one) southbound express lanes along the entirety of the approximately 3-mile corridor evaluated for this project seems highly debatable, making it prudent to evaluate alternatives that include only one (or even zero) southbound express lanes along the project corridor or a significant portion thereof. In addition to assessing the ability of such an alternative to meet reasonable transportation needs along this portion of the corridor, the EA should also assess how the environmental impacts of such an alternative would differ from the one build alternative evaluated in the EA.

It is also worth pointing out that the “Sensitivity Analysis” discussed in Appendix I to the EA’s Traffic and Transportation Technical Report demonstrates that the project would actually make various traffic conditions on the general purpose lanes *worse* in both directions—and considerably so in the northbound direction (adding up to four minutes to travel times)—if Maryland does not build managed lanes on I-495 across the American Legion Memorial Bridge and continuing north.<sup>10</sup> This is important information that decision-makers should be aware of, particularly in light of significant reductions anticipated in federal and state transportation budgets due to the economic damage caused by the coronavirus pandemic. However, this information appears to only be included in Appendix I to the Traffic and Transportation Technical Report; we were not able to find a discussion of the results of the Sensitivity Analysis in the EA itself or even in the main Traffic and Transportation Technical Report. We urge you to revise the EA to incorporate summaries of the key findings from the Sensitivity Analysis into the discussion of the Build Alternative’s ability to address the project purpose and need in Section 2.3.

<sup>7</sup> EA, 4-5.

<sup>8</sup> EA, 2-8 to 2-9.

<sup>9</sup> EA, 2-10.

<sup>10</sup> See Appendix I (Sensitivity Analysis) to Traffic and Technical Report, 7-14; 24-29.

**4** The traffic analysis presented in the EA studied the roadway network up to and including the American Legion Memorial Bridge (ALMB). In the EA, the travel times in the southbound direction in the No Build scenarios reflect an upstream bottleneck effect resulting from constraints at the ALMB which are alleviated in the Build scenario. This bottleneck occurs on the southbound GP lanes in the No Build scenarios, which assumes the Maryland managed lane system is in place but the I-495 NEXT project is not constructed (see Figures 2-4 and 2-5 in the EA for illustration of this bottleneck). This bottleneck in the No Build scenario severely meters traffic at the ALMB, resulting in substantial congestion upstream in Maryland and higher speeds downstream in Virginia.

An expanded traffic analysis, presented in the *I-495 NEXT Traffic and Transportation Technical Report*, studied the roadway network further north, up to just south of the River Road (MD-190) interchange. As shown in this analysis, southbound travel times from River Road to Route 123 are anticipated to be reduced from 15 minutes in the No Build scenario to 8 minutes in the Build scenario due to the continuous network of managed/Express lanes provided in the Build scenario (see Figures ES-14 and ES-16 and Table ES-5 of the technical report). In addition, the southbound and northbound lanes provide travel choices that would encourage carpooling and vanpooling, and allow for reliable transit options in the future.

**5** The need for two express lanes in the southbound direction was demonstrated in the traffic analysis for the EA. The No Build scenario studied an option for no new express lanes, and was demonstrated not to meet the project purpose and need. The provision of two lanes would eliminate future bottlenecks at the ALMB in the southbound direction and discourage cut-through traffic from using local roads to avoid using the Capital Beltway. Two managed lanes in each direction would have a similar footprint to one managed lane because a single managed lane would require a wider paved shoulder for safety concerns and emergency access. Therefore, the 2045 Build scenario evaluated two managed lanes in each direction, as well as various interchange design options. Adding two managed lanes in each direction is also consistent with the typical section on the adjacent southern section of I-495. The Build Alternative would meet the project purpose and need. Additional detail regarding the southbound traffic output is provided in the previous response. See the *I-495 NEXT Traffic and Transportation Technical Report* for more detail.

**6** As demonstrated by the analysis, northbound general purpose travel times on I-495 would worsen if Maryland does not build managed lanes across the American Legion Memorial Bridge (ALMB). The difference in the southbound general purpose travel time would be negligible (5:06 in the No Build scenario compared to 5:11 in the Build scenario). However, other benefits of the I-495 NEXT project would be recognized throughout the Virginia roadway network including an overall increase in person throughput resulting from additional capacity, and improved arterial operations resulting from a shift in travel demand off congested arterials. The I-495 NEXT project has independent utility regardless of the separate Maryland Managed Lane project; additional detail is provided in response 3 on the previous page.



Providing a Meaningful Analysis of Greenhouse Gas Impacts

VDOT's current guidelines<sup>11</sup> that only call for a *qualitative* assessment of a project's greenhouse gas emissions (GHG) in environmental impact statements—and do not call for *any* assessment of GHG emissions in environmental assessments—diminish both the urgency of the threat that climate change poses, as well as the extent to which our transportation systems are contributing to it. With the transportation sector being the largest source of GHG emissions in Virginia (as well as nationwide),<sup>12</sup> and with privately-owned vehicles contributing a major share of those emissions,<sup>13</sup> it is crucial that Virginia's transportation agencies use the NEPA process to provide decision-makers and the public with information and estimates on the GHG emissions of transportation proposals that, like the 495 NEXT proposal, would add significant regional highway-lane capacity. For that reason, we appreciate that VDOT has provided at least some project-specific assessment of the GHG impacts of the 495 NEXT proposal in the EA.<sup>14</sup> However, we urge the agency to go further than the cursory, qualitative discussion included in the EA, and to use readily available tools such as the U.S. Environmental Protection Agency's MOVES model and the Federal Highway Administration's Infrastructure Carbon Estimator (ICE) tool to provide a more quantitative estimate of how the project will impact GHG emissions.

At the very least, VDOT should make changes to improve the qualitative GHG discussion provided in the EA. First, it should incorporate more project-specific analysis of the GHG emissions that would result from any changes in travel patterns, mode choice, land use, and traffic congestion predicted to occur because of the proposal. Simply assessing—in the broadest terms—the change in VMT on the I-495 corridor over the life of the project is of limited value in assessing its overall impact on GHG emissions, and in evaluating any changes to the project that might help reduce that impact (such as a more direct investment in transit service, or a more limited lane expansion).

Further, additional explanation is needed of how the project is expected to result in a lower increase in VMT than the No Build condition. Specifically, the EA's Air Quality Technical Report states that “the build [alternative] will increase affected 2045 VMT by 22.4% over 2018, while the no-build [alternative] increases VMT by 28.9% over the same period.”<sup>15</sup> The discussion of GHG impacts in the EA suggests that the express lanes would increase the use of carpooling and vanpooling and potential future bus service in the corridor, and that the increased use of these modes would “reduc[e] VMT and result[] in a decrease in GHG emissions.”<sup>16</sup> However, it is difficult to see how a project that adds four express lanes to an interstate highway could possibly result in a lower increase in VMT than the No Build condition, even if the express lanes do promote greater use of alternative modes—particularly in light of decades of experience with increased highway capacity in the Washington metro area resulting in increased VMT.

<sup>11</sup> See, VDOT, *Project-Level Air Quality Analysis Resource Document* 33 (Dec. 2018).

<sup>12</sup> See <https://www.epa.gov/greenvehicles/fast-facts-transportation-greenhouse-gas-emissions>.

<sup>13</sup> *Id.*

<sup>14</sup> See EA, 3-36; Air Quality Technical Report, 8, 60.

<sup>15</sup> Air Quality Technical Report, 8.

<sup>16</sup> EA, 3-36.

7

7 There are currently no explicit federal requirements pertaining to transportation project-related greenhouse gas (GHG) emissions, although a qualitative GHG assessment was completed in 2019 to help support an informed decision. In the absence of federal requirements, VDOT is currently evaluating options to address GHG emissions and climate change impacts in environmental documents. Virginia's participation in the Transportation and Climate Initiative may also result in future GHG emission reductions.

8

8 Although vehicle miles traveled (VMT) is anticipated to increase between 2018 and 2045 (consistent with national and local trends over the past several decades), VMT is expected to be lower in the 2045 Build scenario compared to the 2045 No Build scenario. This is attributed to a number of factors. The Express Lanes would directly encourage carpooling and improve I-495 bus operations (see response 1 for more detail on transit benefits), both of which are anticipated to reduce VMT and GHG emissions. While the I-495 NEXT project would result in some localized re-routing of traffic due to the new Express Lanes being available (e.g., from the local arterial network back onto I-495), it is not anticipated to induce much new demand upstream or downstream of the project. The project is also anticipated to shift demand in Virginia from parallel arterial facilities to the freeway network, which would result in more direct (shorter-distance) trips being taken. The managed lane system in Maryland is assumed to be in place for the future No Build and Build scenarios, including managed lanes across the ALMB, and this represents a more substantial capacity improvement to the overall regional roadway network than Virginia's I-495 NEXT project. The qualitative GHG analysis, conducted in 2019, relied on the same traffic used in the quantitative mobile source air toxic (MSAT) analysis, which generally focuses on roadways where ADT is expected to change by +/- 5% as a result of the project, consistent with FHWA guidance.



We also wish to point out that the qualitative discussion included in the EA relies on 2019 Energy Information Administration (EIA) projections of future fuel economy to support the assertion that the “improvement in vehicle emission rates is more than sufficient to offset the increase in VMT” attributable to the project.<sup>17</sup> These EIA projections, however, do not take into account the Trump administration’s recent major rollback of the nation’s Corporate Average Fuel Economy (CAFE) standards.<sup>18</sup> This means the emissions reduction rates relied upon in the EA are not likely to be as significant as the EA predicts, and that will reduce the extent to which they will mitigate the GHG emissions that result from the project. As a result, the EA’s GHG assessment should be revised to reflect the current state of the CAFE standards and to explain how the new standards will influence GHG emissions from the project.

9

Addressing Water Quality Impacts through Enhanced Stormwater Management

As noted in one of the responses to the “FAQs” included on VDOT’s website for this project, this segment of the I-495 corridor currently does not have stormwater management facilities.<sup>19</sup> We have emphasized in our prior comments that this project presents a valuable opportunity to capture and treat stormwater runoff not just from the new areas of impervious surface this proposal would generate, but from the existing lanes as well. Others involved in the NEPA process have made a similar point, with the Fairfax County Board of Supervisors strongly recommending “upholding stormwater management and water quality controls above the minimum requirements,”<sup>20</sup> and with the Army Corps of Engineers recommending that “improved stormwater management should be considered as the study is developed.”<sup>21</sup>

Unfortunately, we still see no clear explanation of whether the project will be designed to address runoff from the existing lanes in addition to the new impervious surface it would add. Further, the benefits such an approach would provide to receiving waters in the area are obscured by the EA’s insufficient analysis of the project’s water quality impacts. In section 3.13, for instance, the EA notes that the Potomac River is already impaired due to excess nutrient and sediment input, but it then summarily concludes that the project will not impact the river because it is not located within the project’s “limits of disturbance.” This conclusion overlooks the fact that there are tributaries of the Potomac that are located within the limits of disturbance and would convey polluted stormwater runoff from the project to the impaired river.

10

The EA’s analysis of indirect effects to water quality does not cure the deficiency. It does acknowledge that the increase in impervious surface from the project could increase runoff volume and velocity, and that runoff typically conveys nutrients and sediments that contribute to water quality impairments in waters like the Potomac that have excessive amounts of both pollutants. It then states that implementation of stormwater management measures would help “minimize potential degradation of water quality due to increased impervious surface” and

Comment continued on next page

<sup>17</sup> EA, 3-36.

<sup>18</sup> U.S. Energy Info. Admin., *Summary of Legislation and Regulations included in the Annual Energy Outlook 2019*, 27 (Mar. 2019).

<sup>19</sup> See <http://www.495northernextension.org/faq/default.asp>.

<sup>20</sup> EA, 4-7.

<sup>21</sup> EA, 4-3.

9 A major factor in mitigating the increase in VMT between 2018 and 2045 is EPA’s GHG emission standards, implemented in concert with national fuel economy standards. The Energy Information Administration (EIA) estimated that fuel economy will improve by 65% between 2018 and 2050 for all light-duty vehicles. This improvement in vehicle emissions rates is more than sufficient to offset the increase in VMT over this period. Thus, the project area would see a net reduction in GHG emissions under the 2045 Build Alternative compared to the 2045 No Build Alternative or the 2018 existing conditions. The recent rollback of some light-duty vehicle fuel economy standards may reduce the EIA’s projections of future fuel economy benefits, but improvements in GHG emission rates are still planned for light, medium, and heavy-duty vehicles in the coming years. Therefore, the recent rollback is not reasonably expected to change the conclusions of the qualitative GHG analysis in the *Air Quality Technical Report*. The impacts of the recent rollback would not be able to be adequately quantified until the EPA releases a MOVES model update that incorporates the new light-duty vehicle GHG emission rates.

10 I-495 NEXT is required to comply with the administration, implementation, and enforcement of the Virginia Stormwater Management Act through permits issued by a Virginia Stormwater Management Program (VSMP) authority. In accordance with the Virginia Administrative Code (9VAC25-870), stormwater management infrastructure would be provided to address runoff from new impervious surfaces. Water quality best management practices (BMP) would mitigate the nutrient impact from the new impervious surfaces. Water quantity would be addressed through the implementation of stormwater management facilities, adequate outfall, and channel and flood protection requirements. Stormwater management facilities would be designed to address runoff capacity and velocity, and receiving waters would be analyzed for outfall adequacy.

Stormwater BMPs for water quality and water quantity for the existing impervious area within the limits of disturbance are not required in accordance with I-495 NEXT’s specific project requirements as outlined in 9VAC25-870. Runoff for the existing impervious surface is being addressed through VDOT’s Municipal Separate Storm Sewer System (MS4).

VDOT presented stormwater management (SWM) options to the Virginia Department of Environmental Quality (VDEQ) to provide a holistic view of impacts to the surrounding properties should the project meet County requirements. VDEQ agreed with VDOT’s assessment that the impact to residences and loss of natural habitat were too great to follow more stringent regulations. This documentation has also been shared with Fairfax County. The current SWM approach for the I-495 NEXT project satisfies meeting the requirements to the maximum extent practicable with the application of both onsite SWM facilities and nutrient credits. This approach was confirmed after 18 months of coordination between VDEQ, VDOT and Fairfax County to identify a balanced solution.

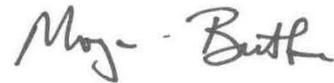


“remove many pollutants before discharging into the receiving impaired water.”<sup>22</sup> Implicit within these statements, however, are acknowledgments that there will still be some degradation of water quality and discharge of pollutants into receiving waters even with full compliance with current stormwater requirements. This implicit acknowledgement highlights the fact that VDOT will need to go beyond the bare minimum of treating only the impervious surface the project would add to the I-495 corridor, and instead also treat a significant portion of the existing impervious surface along the highway, to avoid this project further degrading the Potomac River. The EA should explicitly address this issue and the stormwater management control measures to be taken.

*Comment  
continued  
from  
previous  
page*

Thank you for your consideration of our comments, and please do not hesitate to contact me to discuss any of these issues in more detail.

Sincerely,



Morgan Butler  
Senior Attorney

---

<sup>22</sup> EA, 3-66.

# SENATE OF VIRGINIA

**JANET D. HOWELL**  
32ND SENATORIAL DISTRICT  
POST OFFICE BOX 2608  
RESTON, VIRGINIA 20195  
PHONE: (703) 709-8283  
SENHOWELL@GMAIL.COM



COMMITTEE ASSIGNMENTS:  
FINANCE AND APPROPRIATIONS, CHAIR  
EDUCATION AND HEALTH  
LOCAL GOVERNMENT  
PRIVILEGES AND ELECTIONS  
RULES

March 11, 2020

Virginia Department of Transportation  
Attention: Abi Lerner, P.E.  
4975 Alliance Drive  
Fairfax, Virginia 22030

Dear Mr. Lerner:

Transurban has been a good partner for the Commonwealth of Virginia. As P3s have been pursued in Northern Virginia, their projects have significantly improved our transportation system and reduced congestion. Congestion near the American Legion Bridge is some of the worst in our region. While significant progress has been made to reduce congestion along many of Northern Virginia's interstate corridors, we must do more to address the remaining problem areas. The 495 NEXT project will improve the quality of life for thousands of commuters who rely on I-495 for their daily commute by reducing congestion near the American Legion Bridge.

I have seen the benefits of the 495 Express Lanes for my constituents. This project has been a major success and is moving thousands of commuters through a busy corridor, and providing transportation choices such as carpooling and transit. The 495 NEXT project can bring these same benefits to this corridor and relieve congestion. As Chairman of the Senate Finance and Appropriations Committee, I recognize the importance of relieving congestion to the economy in Northern Virginia which drives the Commonwealth's economy. I understand that this project will deliver over \$800 million in economic impact to the region and support over 6,000 jobs during the construction. The long term benefits are even more significant as the project will substantially improve the ability for our citizens to get to and from work on time and to move goods through this corridor. This project is important to making our region economically competitive for decades to come.

I urge that the 495 NEXT project move forward without delay. The extension of these express lanes and the widening of the American Legion Bridge is vital to our continued economic growth.

Sincerely,

A handwritten signature in cursive script that reads "Janet Howell".

Janet D. Howell  
Senator

# SENATE OF VIRGINIA

**DAVID W. MARSDEN**  
37TH SENATORIAL DISTRICT  
PART OF FAIRFAX COUNTY  
P. O. Box 10889  
BURKE, VIRGINIA 22009



COMMITTEE ASSIGNMENTS:  
AGRICULTURE, CONSERVATION AND  
NATURAL RESOURCES  
LOCAL GOVERNMENT  
TRANSPORTATION

Secretary of Transportation  
Shannon Valentine  
P.O. Box 1475  
Richmond, VA 23218

As the Chairman of Senate Transportation and a legislator from Northern Virginia, I write this letter to urge the Commonwealth to advance the “495 NEXT Project”, a project that will dramatically reduce congestion and improve safety on I-495 near the American Legion Bridge.

495 NEXT will extend existing Express Lanes in one of the most trafficked and congested corridors in the state: from the Dulles Toll Road to the George Washington Memorial Parkway. By extending Express Lanes, 495 NEXT will significantly reduce commute times, decrease the average number of accidents per day, and provide additional transit options.

In addition to roadway improvements, the 495 NEXT Project offers clear economic incentives. As a *privately funded* project, 495 NEXT will not only cost nothing to Virginia taxpayers, but also generate thousands of new jobs and millions in economic activity for the Commonwealth. This project also establishes the groundwork for the Capital Beltway Accord.

I encourage expeditious approval of the 495 NEXT project. It undoubtedly advances Virginia’s multimodal network and strengthens Virginia’s position as a transportation leader. I appreciate your consideration.

Thank you,

A handwritten signature in black ink that reads "David Marsden".

Senator Dave Marsden  
Virginia Senate, 37<sup>th</sup> District

# SENATE OF VIRGINIA

RICHARD L. SASLAW  
Majority Leader  
35th Senatorial District  
Post Office Box 1856  
Springfield, Virginia 22151



Committee Assignments:  
Chair, Commerce and Labor  
Education and Health  
Judiciary  
Finance & Appropriations  
Rules

October 5, 2020

To Whom It May Concern:

Northern Virginia is home to nearly 30% of the population in the Commonwealth. Economic opportunity coupled with its proximity to DC have brought exponential growth as well as major congestion to the region. Enhancing our transportation infrastructure is essential to both our quality of life and the ability to move people and goods in the most efficient manner. The 495 NEXT Project will do just that. This project will provide much needed improvements within the I-495 and Potomac River transportation corridor.

Extending the Express Lanes from Tyson's Corner to the GW Memorial Parkway near the American Legion Bridge is long overdue. Reducing the average commute, providing alternative transit options for daily travelers and minimizing the number of accidents is a major goal for the 495 Next Project. I believe this is achievable.

Virginia has the opportunity to constructively advance its transportation network. The benefits from 495 Next Project include economic growth, bike and pedestrian options as well as eliminating neighborhood cut through traffic. This clearly is a win/win for the region and the Commonwealth. I urge you to move this project forward in a timely manner.

Sincerely,

*Richard L. Saslaw*



April 17, 2020

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

Dear I-495 Express Lanes Northern Expansion Team,

We are writing to express the importance of making public transit the top priority of the I-495 Northern Expansion project. 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 and improvements, the lack of transit in the VDOT's I-495 Northern Expansion is shortsighted, ignores the ongoing process to identify transit options via the I-495/American Legion Bridge Transit Study/TDM study<sup>1</sup>, 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 and State of Virginia 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. This approach has repeatedly been proven not to provide long-term congestion relief, is not in harmony with Fairfax County's plans for Tysons, and will increase greenhouse gas emissions.

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 the CECAP goals of reducing emissions. 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 Plan. 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

<sup>1</sup> Starting at p. 19

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

1

The Build Alternative described in Section 2.2.2 of the EA would result in a transit enhancement. Express Lanes provide a dedicated running way for buses (which is shared with HOV-3+ vehicles and toll paying vehicles). Buses and HOV-3+ vehicles do not have to pay to use of the facility. Through the use of dynamic tolls, the operator can manage traffic flows to allow buses to travel at higher desired speeds and to provide better travel time reliability for transit trips. With the provision of the dedicated running way, transit operators are able to run transit routes that provide a travel time advantage to potential passengers. This is a condition similar to the operation that may be provided with the implementation of a Bus Rapid Transit facility. The provision of fast and reliable transit service serves as an incentive for drivers to shift to transit rather than use their automobiles.

As indicated in the November 30, 2020 letter from Secretary Valentine to the Chairman of the Fairfax County Board of Supervisors, the Commonwealth of Virginia is committed to provide dedicated, ongoing support for transit services along the corridor as part of the I-495 NEXT project. This commitment ensures that the I-495 NEXT project, together with the existing I495 Express Lanes, provide multimodal solutions to move more people through the corridor.

Under a separate but parallel study that is being coordinated with VDOT, the Virginia Department of Rail and Public Transportation (DRPT) is conducting its I-495 American Legion Bridge Transit and TDM Study in coordination with the Maryland Department of Transportation's Maryland Transit Administration (MTA). The recommendations resulting from this separate study are aimed to work in concert with Virginia's proposed northern extension of the I-495 Express Lanes and Maryland's separately proposed managed lanes program for the American Legion Bridge, I-495, and I-270. More details on this study and recent updates may be found on the project website:

<http://drpt.virginia.gov/transit/major-initiatives/i-495american-legion-bridge-transit-and-tdm-study/>

1

service; for example, expansion of the Purple Line from Tysons to Bethesda.<sup>2</sup> 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.

The project should include dedicated right-of-way and dedicated funding for transit. Adding transit would help achieve VDOT's own goals for the I-495 expansion, which include providing additional travel choices, and improving travel reliability. Giving people the choice of driving in either regular lanes or HOT lanes excludes those seeking public transit as well as those without cars. 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 on transit to connect them to where they need to go. HOT lanes alone do not provide additional travel choices for everyone.

Transportation is the leading contributor to climate change in Virginia. As growing numbers of communities and individuals demand solutions to combat climate change, it is crucial to include sustainable transportation options such as public transit, bicycle/pedestrian connections in all transportation proposals. Climate change, public health, and a vibrant economy are inextricably linked. Reducing greenhouse gas emissions via solutions like public transit benefits all of us.

Sincerely,

Cheri Conca  
Conservation Program Coordinator, Northern Virginia  
Sierra Club Virginia Chapter

Stewart Schwartz  
Executive Director  
Coalition for Smarter Growth

Renee Grebe  
Northern Virginia Conservation Advocate  
Audubon Naturalist Society

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<sup>2</sup> We will be submitting separate comments regarding the American Legion Bridge transit and TDM study and Maryland's 495/270 study seeking analysis of potential rail connections between Tysons and Bethesda (Silver Line and Red Line) as well as engineering for the American Legion Bridge to support heavy rail, as was included in the Woodrow Wilson Bridge.

2

Travel benefits to the region include additional interstate capacity, the provision of a facility to enhance transit service, new travel choices, decreased travel time during peak periods, and reduced length of rush hours. For drivers using the American Legion Memorial Bridge (ALMB), this project would add capacity, improve the existing bottleneck, provide new travel choices, reduce congestion on the existing lanes, and improve travel time reliability across the bridge. For drivers using the George Washington Memorial Parkway (GWMP), this project would add capacity, improve the existing bottleneck at the on-ramps for the I-495 interchange, and reduce the weaving needed to access the GWMP from I-495. For drivers using local and neighborhood roads, this project would reduce cut-through traffic by rerouting vehicles to I-495, and reduce delay and congestion at intersections along adjacent local roads.

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The analysis indicates that the implementation of the project would have no adverse impacts to air quality; no violation of the National Ambient Air Quality Standards. The project includes the construction of a shared-use path behind the noise wall between Lewinsville Road and Live Oak Drive.

August 27, 2020

Hon. Ralph Northam  
Governor of Virginia  
P.O. Box 1475  
Richmond, VA 23218

Hon. Larry Hogan  
Governor of Maryland  
100 State Circle  
Annapolis, MD 21401

Douglas Stewart  
Transportation Co-Chair, VA Sierra Club  
10822 Maple St.  
Fairfax, VA 22030

TRAN



Re: Capital Beltway Accord project

Dear Governor Northam and Governor Hogan:

As Maryland and Virginia work together to develop plans to expand capacity on the Capital Beltway from the George Washington Memorial Parkway to River Road (“Capital Beltway Accord project”), the undersigned groups believe any project that is advanced must be designed to substantially expand transportation choices and align with both states’ goals for reducing greenhouse gas emissions and other air pollutants. We recognize the need to rehabilitate the American Legion Bridge and expand its capability to carry more people, but it is imperative that the project plans be developed with full transparency and public input to ensure that these goals are met and that public benefits are maximized.

In contrast, we believe a conclusions-first approach was used in the development of Maryland’s Beltway/I-495 and I-270 Managed Lanes proposal<sup>1</sup> (“495-270 proposal”) and Virginia’s I-495 Express Lanes Northern Expansion (“495 NEXT”) project. As a result, the proposals that have emerged from those processes are overwhelmingly focused on facilitating only one travel mode—single occupancy vehicles (SOVs)—and miss a major opportunity to reduce air and climate pollution. We strongly urge you to take a very different and far more holistic approach with the Capital Beltway Accord project, as discussed further below.

Specific shortcomings of Maryland’s 495-270 proposal and Virginia’s 495 NEXT project include:

- Inadequate support for transit: Neither project provides adequate funding for transit enhancements despite a demonstrated need for better transit along the Beltway corridor. This is inconsistent with local land use plans. For example, Fairfax County’s comprehensive plan recognizes that high-quality transit service on dedicated or express

<sup>1</sup> Some of the signatories to this letter will be submitting a more detailed response to the Draft Environmental Impact Statement on this project in Maryland.



lanes is essential to the growth of Tysons.<sup>2</sup> Similarly, Montgomery's land use and transportation consistently calls for the integration of bus rapid transit and other transit modes into the county and region's transportation system.

- **Insufficient alternatives analysis:** Any effort to determine the most beneficial and environmentally responsible options for improving I-495 through Maryland and Virginia should evaluate a scenario focused on transit improvements with supportive land uses, as recommended as one of the most cost-effective scenarios in the Metropolitan Washington Council of Governments' Visualize2045 Long-Range Transportation Plan.<sup>3</sup> The addition of improved and supported telework could enhance such alternatives. Yet the reviews for both of these proposals under the National Environmental Policy Act ("NEPA") have failed to assess a robust range of alternatives and instead have focused too heavily on expanding SOV travel capacity. Highway expansion has repeatedly been proven to fail in reducing congestion, and it results in increases in greenhouse gas emissions and other pollution over time.<sup>4</sup>
- **Insufficient transparency:** Virginia has, in recent years, strengthened its Public-Private Transportation Act to improve transparency. However, in both states there are ongoing communications with potential concessionaires that are shrouded from public view, and these can result in projects like the 495-270 proposal and 495 NEXT being predicated on maximizing toll revenue to meet financing assumptions rather than prioritizing public and environmental benefits.
- **Undermining of air quality and greenhouse gas emissions goals:** Transportation is the leading contributor to greenhouse gas emissions in Virginia and Maryland, driven largely by private auto travel. Further, the D.C metropolitan area is currently in non-attainment of Federal ozone standards, and the health costs of highway-related particulate matter (PM 2.5) pollution are increasingly apparent. To reduce greenhouse gas emissions and other air pollution, state governments must promote more transit, bicycling, walking, and transit-oriented development (TOD) rather than facilitating and encouraging more driving. Yet the 495-270 proposal and 495 NEXT project both promote and facilitate SOV travel, undermining both states' efforts to reduce greenhouse gas emissions and improve air quality.
- **Economic and social inequity:** It costs an average of \$9,282 a year to own and maintain a car, according to 2019 AAA figures (<https://newsroom.aaa.com/auto/your-driving-costs/>), and many in the workforce earn less than \$50,000 a year. These two projects based on

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<sup>2</sup> See Comprehensive Plan-Tysons Corner Urban Center, "Public Transportation Goals," ppg. 42-43, at [https://www.fairfaxcounty.gov/tysons/sites/tysons/files/assets/documents/pdf/comprehensive\\_plan/fc\\_comp\\_plan2017ed\\_tysons\\_amended04\\_04\\_2017.pdf](https://www.fairfaxcounty.gov/tysons/sites/tysons/files/assets/documents/pdf/comprehensive_plan/fc_comp_plan2017ed_tysons_amended04_04_2017.pdf)

<sup>3</sup> See Metropolitan Washington Transportation Planning Board Visualize 2045 Long-Range Plan (approved 2018), Chapter 4 (Aspirational Element), [https://www.mwcog.org/assets/1/6/Final\\_Visualize\\_2045\\_-\\_Chapter\\_4.pdf](https://www.mwcog.org/assets/1/6/Final_Visualize_2045_-_Chapter_4.pdf). The balanced jobs-housing scenario was found to be one of the cost-effective ways to mitigate congestion.

<sup>4</sup> For a recent study of the ineffectiveness of road capacity expansion to provide long-term congestion relief, see Todd Litman, *Generated Traffic and Induced Travel: Implications for Transport Planning*, Victoria Transport Policy Institute, 2020. <https://www.vtpi.org/gentraf.pdf>



variably-priced express lanes that will be too expensive for many workers to use will do too little to expand access to jobs and services for residents who cannot afford the high costs of owning a car. Construction of the proposed Maryland 495-270 managed lanes will directly impact areas where 60% of the population is minority (African-Americans, Latinx, and Asian), according to the Draft Environmental Impact Statement.<sup>5</sup>

- **Negative impacts to national, state and local parks in both states, and notable environmental impacts:** As currently proposed, these two projects will directly or indirectly damage six national parks and acres of regional park sites. The reviews of these projects under NEPA, Section 4(f) of the Department of Transportation Act, and Section 106 of the National Historic Preservation Act have failed to result in sufficient avoidance and minimization of impacts to parkland and historic resources. The environmental impacts of both projects are significant, as documented in their environmental analyses. The 495-270 project will result in the loss of some 1,500 acres of tree canopy, 16 acres of wetlands, approximately 50 acres of wetland buffers, and will have direct and indirect impacts on 30 miles of streams.<sup>6</sup> The 495 NEXT project will result in loss of 118 acres of tree canopy, and have direct impacts on 19.8 acres of wetlands and more than two miles of streams.<sup>7</sup>

### **Strengthening the Capital Beltway Accord**

Many of the undersigned groups are working to address these and other flaws with the Maryland 495-270 and Virginia 495 NEXT proposals within our respective jurisdictions. However, because Maryland and Virginia are proceeding with planning the Capital Beltway Accord project, and because that project implicates the interests of all of our groups, we are jointly sending this letter to request that your efforts to develop plans for the Capital Beltway Accord project avoid the mistakes listed above by including the following elements:

- **Commitment to a transparent project review process that includes a full analysis of alternatives.** Virginia's experience with using public-private partnerships to advance transportation proposals has shown the review processes must be structured very carefully and transparently to deliver maximum public benefits, and that rigorous NEPA reviews can help officials avoid wasting public money and resources on flawed and environmentally destructive projects. Any public-private partnership pursued for the Capital Beltway Accord project must not short-circuit important aspects of transportation project planning and approval under the NEPA process. The alternatives studied must

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<sup>5</sup> Draft Environmental Impact Statement, I-270 and I-495 managed lanes study, Section 4.2.2 on p. 4-10. [https://495-270-p3.com/wp-content/uploads/2020/07/DEIS\\_Ch4\\_Environmental.pdf](https://495-270-p3.com/wp-content/uploads/2020/07/DEIS_Ch4_Environmental.pdf)

<sup>6</sup> Ibid., Table 4-1 on p. 4-3.

<sup>7</sup> Draft Environmental Assessment, Natural Resources Technical Report, 495-NEXT, p. 11 (stream impacts); p. 20 (wetlands impacts); p. 39 (tree loss). [www.495northernextension.org/documents/pim032020/i-495\\_next\\_7\\_natural\\_resources\\_tech\\_report\\_final.pdf](http://www.495northernextension.org/documents/pim032020/i-495_next_7_natural_resources_tech_report_final.pdf)

include integrated land use (transit-oriented development and jobs/housing balance), expanded transit options, and travel demand management (including telecommuting and park & ride expansion). Estimates of likely greenhouse gas emissions should be provided for each of the different alternatives.

One viable alternative to study would be to combine expanded telecommuting with new transit. Over the last six months, hundreds of thousands of the region's erstwhile commuters successfully and efficiently worked from home. While the region's workers may not all be able to make this a permanent condition, if a significant proportion of telecommuting continued into the future, even if combined with regular in-office meetings and off-peak in-office work commuting, it could well eliminate the need for a significant amount of new investment in SOV access. Instead of investment in hundreds of new lane-miles, vastly improved high-speed internet capacity and access -- especially for those who do not currently have it -- might provide an effective substitute, with substantially lower environmental impacts and costs.

- **A significant contribution to expanded transit.** As noted above, both the 495-270 project and 495 NEXT provide inadequate funding for transit. The Capital Beltway Accord project provides an opportunity to remedy this by funding enhanced transit service along the Beltway corridor between Virginia and Maryland as well as on neighboring roads. The I-66 Outside the Beltway concession includes annual dedicated funding for enhanced transit. A similar funding commitment should be part of the Capital Beltway Accord project to activate high-quality transit on 495.
- **Full evaluation of accommodations for heavy rail on the American Legion Bridge.** In order to achieve climate goals and meet the travel needs of future populations in the Tysons-Bethesda corridor, evaluation of alternatives for bridge rehabilitation or expansion must fully analyze accommodation of heavy rail, such as expansion of the Purple Line into Virginia. The design for the Woodrow Wilson Bridge provides a good example, as it allows for future rail or other high-capacity transit on two of that bridge's twelve lanes.
- **Grade-separated bicycle and pedestrian facilities that connect with trail systems in Maryland and Virginia.** Including bicycle and pedestrian facilities across the American Legion Bridge is essential to overcoming its current barriers to active transportation and providing a much-needed connection to a regional multi-use trail network. Ensuring these facilities are provided and take the form of grade-separated interchanges would provide maximum safety to all trail users. These should be designed in full coordination with the National Park Service and local park authorities to ensure they avoid park resources and maximize protection of environmental resources.

Thank you for your consideration of our comments and concerns. We look forward to being involved in the planning process for the Capital Beltway Accord project. Please note that some of the signatories to this letter will be submitting in October a detailed analysis of the DEIS for Maryland's 495-270 proposal.

Sincerely,

Karen Campblin and Douglas Stewart  
Transportation Co-Chairs, Virginia Sierra Club

Josh Tulkin  
Director, Maryland Sierra Club

Shruti Bhatnagar  
Chair, Montgomery County Sierra Club Group

Stewart Schwartz  
Executive Director, Coalition for Smarter Growth

Morgan Butler, Senior Attorney  
Southern Environmental Law Center

Denisse Guitarra  
Maryland Conservation Advocate  
Audubon Naturalist Society

Renee Grebe  
Northern Virginia Conservation Advocate  
Audubon Naturalist Society

Pamela Goddard  
Senior Program Director, Mid-Atlantic Region, National Parks Conservation Association

Alison Prost, Esq.  
Vice President for Environmental Protection and Restoration  
Chesapeake Bay Foundation

Brad German  
Citizens Against Beltway Expansion, Maryland

cc: Shannon Valentine, Virginia Secretary of Transportation  
Nick Donohue, Virginia Deputy Secretary of Transportation  
Gregory Slater, Maryland Secretary of Transportation  
Peter Franchot, Maryland Comptroller  
Nancy K. Kopp, Maryland Treasurer





495 Northern Extension, rr &lt;495northernextension@vdot.virginia.gov&gt;

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## 495 Express Lanes Northern Extension Project

1 message

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**Cheri Conca** <cheri.conca@sierraclub.org>  
To: 495NorthernExtension@vdot.virginia.gov

Thu, Dec 3, 2020 at 1:06 PM

Dear VDOT,

The following comments were compiled by ten organizations and submitted this past fall to the Governors of Virginia and Maryland. The Sierra Club Virginia Chapter is submitting these comments for the public record during the public comment period regarding the 495 NEXT project's environmental assessment and proposed design.

As Maryland and Virginia work together to develop plans to expand capacity on the Capital Beltway from the George Washington Memorial Parkway to River Road ("Capital Beltway Accord project"), the undersigned groups believe any project that is advanced must be designed to substantially expand transportation choices and align with both states' goals for reducing greenhouse gas emissions and other air pollutants. We recognize the need to rehabilitate the American Legion Bridge and expand its capability to carry more people, but it is imperative that the project plans be developed with full transparency and public input to ensure that these goals are met and that public benefits are maximized.

In contrast, we believe a conclusions-first approach was used in the development of Maryland's Beltway/I-495 and I-270 Managed Lanes proposal<sup>1</sup> ("495-270 proposal") and Virginia's I-495 Express Lanes Northern Expansion ("495 NEXT") project. As a result, the proposals that have emerged from those processes are overwhelmingly focused on facilitating only one travel mode—single occupancy vehicles (SOVs)—and miss a major opportunity to reduce air and climate pollution. We strongly urge you to take a very different and far more holistic approach with the Capital Beltway Accord project, as discussed further below.

Specific shortcomings of Maryland's 495-270 proposal and Virginia's 495 NEXT project include:

- **Inadequate support for transit:** Neither project provides adequate funding for transit enhancements despite a demonstrated need for better transit along the Beltway corridor. This is inconsistent with local land use plans. For example, Fairfax County's comprehensive plan recognizes that high-quality transit service on dedicated or express lanes is essential to the growth of Tysons.<sup>2</sup> Similarly, Montgomery's land use and transportation consistently calls for the integration of bus rapid transit and other transit modes into the county and region's transportation system.
- **Insufficient alternatives analysis:** Any effort to determine the most beneficial and environmentally responsible options for improving I-495 through Maryland and Virginia should evaluate a scenario focused on transit improvements with supportive land uses, as recommended as one of the most cost-effective scenarios in the Metropolitan Washington Council of Governments' Visualize2045 Long-Range Transportation Plan.<sup>3</sup> The addition of improved and supported telework could enhance such alternatives. Yet the reviews for both of these proposals under the National Environmental

Policy Act (“NEPA”) have failed to assess a robust range of alternatives and instead have focused too heavily on expanding SOV travel capacity. Highway expansion has repeatedly been proven to fail in reducing congestion, and it results in increases in greenhouse gas emissions and other pollution over time.<sup>4</sup>

- Insufficient transparency: Virginia has, in recent years, strengthened its Public-Private Transportation Act to improve transparency. However, in both states there are ongoing communications with potential concessionaires that are shrouded from public view, and these can result in projects like the 495-270 proposal and 495 NEXT being predicated on maximizing toll revenue to meet financing assumptions rather than prioritizing public and environmental benefits.

- Undermining of air quality and greenhouse gas emissions goals: Transportation is the leading contributor to greenhouse gas emissions in Virginia and Maryland, driven largely by private auto travel. Further, the D.C metropolitan area is currently in non-attainment of Federal ozone standards, and the health costs of highway-related particulate matter (PM 2.5) pollution are increasingly apparent. To reduce greenhouse gas emissions and other air pollution, state governments must promote more transit, bicycling, walking, and transit-oriented development (TOD) rather than facilitating and encouraging more driving. Yet the 495-270 proposal and 495 NEXT project both promote and facilitate SOV travel, undermining both states’ efforts to reduce greenhouse gas emissions and improve air quality.

- Economic and social inequity: It costs an average of \$9,282 a year to own and maintain a car, according to 2019 AAA figures (<https://newsroom.aaa.com/auto/your-driving-costs/>), and many in the workforce earn less than \$50,000 a year. These two projects based on variably-priced express lanes that will be too expensive for many workers to use will do too little to expand access to jobs and services for residents who cannot afford the high costs of owning a car. Construction of the proposed Maryland 495-270 managed lanes will directly impact areas where 60% of the population is minority (African-Americans, Latinx, and Asian), according to the Draft Environmental Impact Statement.<sup>5</sup>

- Negative impacts to national, state and local parks in both states, and notable environmental impacts: As currently proposed, these two projects will directly or indirectly damage six national parks and acres of regional park sites. The reviews of these projects under NEPA, Section 4(f) of the Department of Transportation Act, and Section 106 of the National Historic Preservation Act have failed to result in sufficient avoidance and minimization of impacts to parkland and historic resources. The environmental impacts of both projects are significant, as documented in their environmental analyses. The 495-270 project will result in the loss of some 1,500 acres of tree canopy, 16 acres of wetlands, approximately 50 acres of wetland buffers, and will have direct and indirect impacts on 30 miles of streams.<sup>6</sup> The 495 NEXT project will result in loss of 118 acres of tree canopy, and have direct impacts on 19.8 acres of wetlands and more than two miles of streams.<sup>7</sup>

## Strengthening the Capital Beltway Accord

Many of the undersigned groups are working to address these and other flaws with the Maryland 495-270 and Virginia 495 NEXT proposals within our respective jurisdictions. However, because Maryland and Virginia are proceeding with planning the Capital Beltway Accord project, and because that project implicates the interests of all of our groups, we are jointly sending this letter to request that your efforts to develop plans for the Capital Beltway Accord project avoid the mistakes listed above by including the following elements:

• **Commitment to a transparent project review process that includes a full analysis of alternatives.** Virginia's experience with using public-private partnerships to advance transportation proposals has shown the review processes must be structured very carefully and transparently to deliver maximum public benefits, and that rigorous NEPA reviews can help officials avoid wasting public money and resources on flawed and environmentally destructive projects. Any public-private partnership pursued for the Capital Beltway Accord project must not short-circuit important aspects of transportation project planning and approval under the NEPA process. The alternatives studied must include integrated land use (transit-oriented development and jobs/housing balance), expanded transit options, and travel demand management (including telecommuting and park & ride expansion). Estimates of likely greenhouse gas emissions should be provided for each of the different alternatives.

One viable alternative to study would be to combine expanded telecommuting with new transit. Over the last six months, hundreds of thousands of the region's erstwhile commuters successfully and efficiently worked from home. While the region's workers may not all be able to make this a permanent condition, if a significant proportion of telecommuting continued into the future, even if combined with regular in-office meetings and off-peak in-office work commuting, it could well eliminate the need for a significant amount of new investment in SOV access. Instead of investment in hundreds of new lane-miles, vastly improved high-speed internet capacity and access -- especially for those who do not currently have it -- might provide an effective substitute, with substantially lower environmental impacts and costs.

• **A significant contribution to expanded transit.** As noted above, both the 495-270 project and 495 NEXT provide inadequate funding for transit. The Capital Beltway Accord project provides an opportunity to remedy this by funding enhanced transit service along the Beltway corridor between Virginia and Maryland as well as on neighboring roads. The I-66 Outside the Beltway concession includes annual dedicated funding for enhanced transit. A similar funding commitment should be part of the Capital Beltway Accord project to activate high-quality transit on 495.

• **Full evaluation of accommodations for heavy rail on the American Legion Bridge.** In order to achieve climate goals and meet the travel needs of future populations in the Tysons-Bethesda corridor, evaluation of alternatives for bridge rehabilitation or expansion must fully analyze accommodation of heavy rail, such as expansion of the Purple Line into Virginia. The design for the Woodrow Wilson Bridge provides a good example, as it allows for future rail or other high-capacity transit on two of that bridge's twelve lanes.

• **Grade-separated bicycle and pedestrian facilities that connect with trail systems in Maryland and Virginia.** Including bicycle and pedestrian facilities across the American Legion Bridge is essential to overcoming its current barriers to active transportation and providing a much-needed connection to a regional multi-use trail network. Ensuring these facilities are provided and take the form of grade-separated interchanges would provide maximum safety to all trail users. These should be designed in full coordination with the National Park Service and local park authorities to ensure they avoid park resources and maximize protection of environmental resources.

Thank you for your consideration of our comments and concerns. We look forward to being involved in the planning process for the Capital Beltway Accord project.

<sup>1</sup> Some of the signatories to this letter will be submitting a more detailed response to the Draft Environmental Impact Statement on this project in Maryland.

<sup>2</sup> See Comprehensive Plan-Tysons Corner Urban Center, “Public Transportation Goals,” ppg. 42-43, at [https://www.fairfaxcounty.gov/tysons/sites/tysons/files/assets/documents/pdf/comprehensive\\_plan/fc\\_comp\\_plan2017ed\\_tysons\\_amended04\\_04\\_2017.pdf](https://www.fairfaxcounty.gov/tysons/sites/tysons/files/assets/documents/pdf/comprehensive_plan/fc_comp_plan2017ed_tysons_amended04_04_2017.pdf)

<sup>3</sup> See Metropolitan Washington Transportation Planning Board Visualize 2045 Long-Range Plan (approved 2018), Chapter 4 (Aspirational Element), [https://www.mwcog.org/assets/1/6/Final\\_Visualize\\_2045\\_-\\_Chapter\\_4.pdf](https://www.mwcog.org/assets/1/6/Final_Visualize_2045_-_Chapter_4.pdf). The balanced jobs-housing scenario was found to be one of the cost-effective ways to mitigate congestion.

<sup>4</sup> For a recent study of the ineffectiveness of road capacity expansion to provide long-term congestion relief, see Todd Litman, *Generated Traffic and Induced Travel: Implications for Transport Planning*, Victoria Transport Policy Institute, 2020. <https://www.vtpi.org/gentraf.pdf>

<sup>5</sup> Draft Environmental Impact Statement, I-270 and I-495 managed lanes study, Section 4.2.2 on p. 4-10. [https://495-270-p3.com/wp-content/uploads/2020/07/DEIS\\_Ch4\\_Environmental.pdf](https://495-270-p3.com/wp-content/uploads/2020/07/DEIS_Ch4_Environmental.pdf)

<sup>6</sup> Ibid., Table 4-1 on p. 4-3.

<sup>7</sup> Draft Environmental Assessment, Natural Resources Technical Report, 495-NEXT, p. 11 (stream impacts); p. 20 (wetlands impacts); p. 39 (tree loss). [www.495northernextension.org/documents/pim032020/i\\_495\\_next\\_7\\_natural\\_resources\\_tech\\_report\\_final.pdf](http://www.495northernextension.org/documents/pim032020/i_495_next_7_natural_resources_tech_report_final.pdf)

Sincerely,

Karen Campblin and Douglas Stewart  
Transportation Co-Chairs, Virginia Sierra Club



**Cheri Conca**  
**Conservation Program Coordinator**

Pronouns: she, her, hers  
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**Important Notice:** All Sierra Club offices are closed due to concerns with COVID-19. Staff are scheduled to work remotely until February 21.





October 21, 2020

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Mr. Douglas Stewart  
Virginia Sierra Club's Transportation and Smart Growth Co-Chair  
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Dear Ms. Campblin and Mr. Stewart:

Thank you for your thoughtful letter to Governors Northam and Hogan highlighting the significance of environmental priorities as the Capital Beltway Accord is developed. Building on the agreement in principle made between our two Governors to replace the aging American Legion Bridge and relieve congestion at one of the country's worst traffic chokepoints, Maryland and Virginia are committed to delivering multimodal network options that offer more seamless mobility throughout the region by integrating land use strategies and transit alternatives and more fully incorporating innovation and technology across the transportation system.

The Capital Beltway Accord will outline how Virginia's I-495 Northern Extension (495 NEXT) and Maryland's I-495 and I-270 Managed Lanes Study (MLS) will interface. The Capital Beltway Accord includes replacement of the existing bridge across the Potomac River, a focus on minimizing impacts to right-of-way, neighborhoods, and the environment, and a new bicycle and pedestrian access connecting trails on both sides of the Potomac.

Significant efforts are underway, jointly and independently, to evaluate alternatives that will influence overall transportation solutions within the region. An I-495 American Legion Bridge Transit and Transportation Demand Management (TDM) study is being conducted jointly by the Virginia Department of Rail and Public Transportation (DRPT) and Maryland Department of Transportation Maryland Transit Administration (MDOT MTA). This study is being performed separately from the environmental review processes related to 495 NEXT and the MLS, and is intended to complement those efforts, lending an independent evaluation of transit demand in the corridor.

Ms. Karen Campblin  
Mr. Douglas Stewart  
October 21, 2020  
Page 2

The American Legion Bridge Transit and TDM Study will include strategies to assist individuals seeking opportunities to save money, save time, and/or avoid traffic congestion by using options other than driving alone to reach their destinations. Recommendations will be made for the services that will utilize the American Legion Bridge and I-495 between I-395/95 in Virginia and I-95 in Maryland, connecting major activity centers and regional transit services in the corridor. These recommendations will focus on bus and rideshare (carpool/vanpool) solutions. The study will inform potential future investments in transit in the I-495/American Legion Bridge corridor.

A survey focused on commuters and commuting patterns in the I-495/American Legion Bridge corridor has been conducted, and a stakeholder group meets monthly. This group includes representatives of WMATA, MDOT MTA, other local transit agencies, transportation demand management groups, and local jurisdictions in the project corridor. We will also continue to seek additional public input through future 495 NEXT public meetings.

As you noted, commuting patterns have changed tremendously over the past six months. The Virginia Department of Transportation and DRPT launched the Virginia Commuter Survey, a statewide effort to gauge the COVID-19 impacts to commuting around the Commonwealth. The survey results will help us better understand how commuting practices have changed and support ways to identify short- and long-term opportunities and improvements during and after the COVID-19 pandemic.

Maryland is similarly committed to ensuring that transportation improvements are being developed to meet the region's needs not only for today but for the future. Part of this commitment includes the efforts conducted through the transit work group convened as part of the I-495 & I-270 Public-Private Partnership (P3) Program. The transit work group includes local and regional transit service providers and stakeholders tasked with collaboratively identifying opportunities to enhance transit services on the proposed managed lands on I-495 and I-270, and create an interconnected transit/highway system in the National Capital Region.

The transit work group focused on review of existing and planned transit services, review of proposed managed lane access points, analysis of casual carpooling, van pooling, and other ridesharing methods, evaluation of park and ride locations near the I-495 and I-270 corridors, potential markets for express bus service that would benefit from a managed lane network, and new or modified potential transit routes. The result of this effort was the Transit Service Coordination Report that outlines 11 potential transit services supported or indirectly benefited by the proposed managed lanes. This work will assist in identifying potential regional transit service improvements to be developed collaboratively with the affected counties as part of the P3 Program. Transit services are an integral component of the National Capital Region's economic performance. Maryland is committed to providing regional transit service improvements as part of the P3 Program at defined and predictable times.

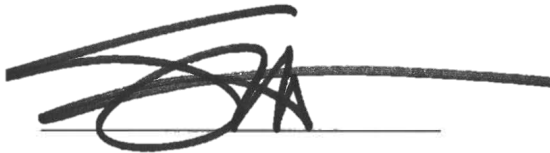
Additionally, Maryland's Statewide Transit Plan (STP) will provide a 50-year vision of coordinated local, regional, and intercity transit across the state. This plan will define public transportation goals and strategies for Maryland's rural, suburban, and urban regions with a vision toward increasingly coordinated, equitable, and innovative mobility.

Ms. Karen Campblin  
Mr. Douglas Stewart  
November 2, 2020  
Page 3

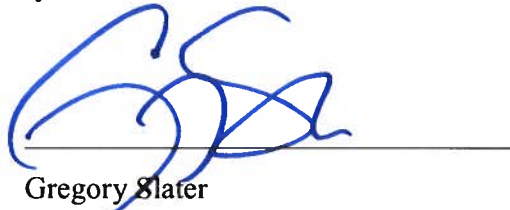
In the Commonwealth, strategic planning to meet the diverse needs of a growing regional population is focused on fostering multimodal transportation solutions and building upon coordination successes, including SMART SCALE and the use of toll funding to support integrated corridor planning in the I-66 and I-95 corridors. Virginia's transit program is reinforced by a commitment to strong planning, prioritization, and performance measurement. Through the establishment of the MERIT (Making Efficient and Responsible Investments in Transit) transit prioritization methodology, the development of coordinated urban transit strategic plans, and a strong innovation program, Virginia is keenly focused on investing in multimodal solutions that provide equitable access to all.

It is our belief that there is no single solution to addressing the regional mobility issues created by the constraints of the Potomac River. As we strive to build upon lessons learned and to provide the best possible transportation solutions, we welcome your thoughts, insights, and recommendations while we continue to develop 495 NEXT and the MLS.

Sincerely,



Shannon Valentine  
Virginia Secretary of Transportation



Gregory Slater  
Secretary, Maryland Department of Transportation

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## 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 study<sup>1</sup>, 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.<sup>2</sup>

<sup>1</sup> “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>

<sup>2</sup> 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.

**1** The Federal Highway Administration (FHWA) and Virginia Department of Transportation (VDOT) have identified I-495 NEXT as a priority project with the specific goals of reducing congestion, providing additional travel choices, and improving travel reliability in an area that is one of the most congested travel areas in the Washington, D.C. metropolitan region. As noted in FHWA’s *The Importance of Purpose and Need in Environmental Documents* (September 1990), the larger transportation planning process—including regional, sub-area, and corridor planning—can serve as the primary source of information for establishing purpose and need for individual projects. Purpose and need for a project are intended to be comprehensive but specific. The purpose and need must be well defined so it can then be used to determine which alternatives are “reasonable, prudent, and practicable” (see [https://www.environment.fhwa.dot.gov/legislation/nepa/guidance\\_purpose\\_need.aspx](https://www.environment.fhwa.dot.gov/legislation/nepa/guidance_purpose_need.aspx)). A letter from the Council on Environmental Governments in May 2003 emphasizes that the lead federal agency (in this case FHWA) “has the authority for and responsibility to define the ‘purpose and need’ for purposes of NEPA analysis.” (see [https://ceq.doe.gov/docs/ceq-regulations-and-guidance/CEQ-DOT\\_PurposeNeed\\_May-2013.pdf](https://ceq.doe.gov/docs/ceq-regulations-and-guidance/CEQ-DOT_PurposeNeed_May-2013.pdf)). FHWA’s guidance notes “While it is entirely appropriate for other agencies to comment on the purpose and need statement, both during early coordination and in response to the draft environmental impact document, other agencies cannot require FHWA...to alter the purpose and need statement.” (See [https://www.environment.fhwa.dot.gov/legislation/nepa/memo\\_purpose\\_need.aspx](https://www.environment.fhwa.dot.gov/legislation/nepa/memo_purpose_need.aspx).)

Although the project purposes do not specifically include reducing greenhouse gases (GHG) and increasing transit options, the I-495 NEXT project would also result in benefits to both of these resources. See response 3 for more information on GHG emissions and response 4 for more information on proposed transit improvements.

VDOT, in coordination with FHWA, local governments, and stakeholders identified an alternative that would meet the project purpose and needs: reduce congestion, provide new travel choices, and improve travel reliability along I-495. The build alternative described in Section 2.2.2 of the Environmental Assessment (EA) was identified as the only reasonable alternative to advance based on the Purpose and Need for the study. For this alternative, VDOT considered a range of design options at several interchanges to meet the needs at those locations. The I-495 NEXT Environmental Assessment (EA) identified one build alternative in detail which is acceptable under FHWA’s Technical Advisory T 6640.8A *Guidance for Preparing and Processing Environmental and Section 4(f) Documents* (FHWA, 1987). These decisions were presented to state and federal permitting agencies through project-specific agency meetings and coordination as the study developed. Under Technical Advisory T6640.8A, it states that “An EA does not need to evaluate in detail all reasonable alternatives for the project and may be prepared for one or more build alternatives.” The single build alternative leaves ample flexibility for different designs to be considered when the project advances to permitting and more detailed phases of design following an FHWA NEPA decision.

**1**



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%.<sup>3</sup> 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.

2

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.<sup>4</sup> 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.

3

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 Plan<sup>5</sup>. 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

See next page for response to this comment

<sup>3</sup>“ COVID-19: Transportation Impacts and Opportunities,” AECOM presentation to NVTA, July 9 2020, [https://thenovaaauthority.org/wp-content/uploads/2020/07/5.NVTA\\_R2S-Scenario-Planning\\_Draft-Presentation\\_7-8-20\\_v3.pdf](https://thenovaaauthority.org/wp-content/uploads/2020/07/5.NVTA_R2S-Scenario-Planning_Draft-Presentation_7-8-20_v3.pdf)  
<sup>4</sup> 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>  
<sup>5</sup> 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](https://www.fairfaxcounty.gov/tysons/sites/tysons/files/assets/documents/pdf/comprehensive_plan/fc_comp_pl_an2017ed_tysons_amended04_04_2017.pdf)

2 The 2018 conditions evaluated in the study are representative of typical conditions in the corridor. The current traffic conditions associated with COVID-19 are anticipated to be temporary, as compared with the ultimate design year used to design the project, which is required to be a minimum of 20 years out. Moreover, the analysis of future conditions is based on 2025 and 2045 models. Daily traffic volumes across Northern Virginia have recovered on average to approximately 80% of pre-COVID-19 volumes, and VDOT traffic data for segments of I-495 shows that daily traffic volumes have recovered to nearly 90% of pre-COVID-19 volumes. Traffic volumes are anticipated to return to pre-COVID-19 levels by the time the project is constructed and operational. In order to understand the potential impacts of reduced traffic demand on the network and the proposed project, VDOT has conducted a sensitivity analysis of impacts to traffic forecast volumes and traffic operations under a conservative scenario where impacts of COVID-19 were long-lasting into the future horizon years, with reductions in traffic volumes.

3 There are currently no explicit federal requirements pertaining to transportation project-related greenhouse gas (GHG) emissions, although a qualitative GHG assessment was completed in 2019 to help support an informed decision. In the absence of federal requirements, VDOT is currently evaluating options to address GHG emissions and climate change impacts in environmental documents. Virginia’s participation in the Transportation and Climate Initiative may also result in future GHG emission reductions.

Although regional vehicle miles traveled (VMT) is anticipated to increase between 2018 and 2045 (consistent with national and local trends over the past several decades), VMT is expected to be lower in the 2045 Build scenario compared to the 2045 No Build scenario, due to fewer circuitous cut-through trips avoiding the Capital Beltway, as observed today. A major factor in mitigating potential increases in VMT between 2018 and 2045 is EPA’s GHG emission standards, implemented in concert with national fuel economy standards. The Energy Information Administration (EIA) estimated that fuel economy will improve by 65% between 2018 and 2050 for all light-duty vehicles. This improvement in vehicle emissions rates is more than sufficient to offset the increase in VMT over this period. Thus, the project area would see a net reduction in GHG emissions under the 2045 Build Alternative compared to the 2045 No Build Alternative or the 2018 existing conditions. The recent rollback of some light-duty vehicle fuel economy standards may reduce the EIA’s projections of future fuel economy benefits, but improvements in GHG emission rates are still planned for light, medium, and heavy-duty vehicles in the coming years. Therefore, the recent rollback is not reasonably expected to change the conclusions of the qualitative GHG analysis in the *I-495 Air Quality Technical Report*. The impacts of the recent rollback would not be able to be adequately quantified until the EPA releases a MOVES model update that incorporates the new light-duty vehicle GHG emission rates.



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%.<sup>3</sup> 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.<sup>4</sup> 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.

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<sup>3</sup>“ COVID-19: Transportation Impacts and Opportunities,” AECOM presentation to NVTA, July 9 2020, [https://thenovaaauthority.org/wp-content/uploads/2020/07/5.NVTA\\_R2S-Scenario-Planning\\_Draft-Presentation\\_7-8-20\\_v3.pdf](https://thenovaaauthority.org/wp-content/uploads/2020/07/5.NVTA_R2S-Scenario-Planning_Draft-Presentation_7-8-20_v3.pdf)

<sup>4</sup> 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>

<sup>5</sup> 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](https://www.fairfaxcounty.gov/tysons/sites/tysons/files/assets/documents/pdf/comprehensive_plan/fc_comp_pl_an2017ed_tysons_amended04_04_2017.pdf)

See previous page for responses to these comments

4

**4** The Build Alternative described in Section 2.2.2 of the EA would result in a transit enhancement. Express Lanes provide a dedicated running way for buses (which is shared with HOV-3+ vehicles and toll paying vehicles). Buses and HOV-3+ vehicles do not have to pay to use of the facility. Through the use of dynamic tolls, the operator can manage traffic flows to allow buses to travel at higher desired speeds and to provide better travel time reliability for transit trips. With the provision of the dedicated running way, transit operators are able to run transit routes that provide a travel time advantage to potential passengers. This is a condition similar to the operation that may be provided with the implementation of a Bus Rapid Transit facility. The provision of fast and reliable transit service serves as an incentive for drivers to shift to transit rather than use their automobiles.

As indicated in the November 30, 2020 letter from Secretary Valentine to the Chairman of the Fairfax County Board of Supervisors, the Commonwealth of Virginia is committed to provide dedicated, ongoing support for transit services along the corridor as part of the I-495 NEXT project. This commitment ensures that the I-495 NEXT project, together with the existing I495 Express Lanes, provide multimodal solutions to move more people through the corridor.

Under a separate but parallel study that is being coordinated with VDOT, the Virginia Department of Rail and Public Transportation (DRPT) is conducting its I-495 American Legion Bridge Transit and TDM Study in coordination with the Maryland Department of Transportation’s Maryland Transit Administration (MTA). The recommendations resulting from this separate study are aimed to work in concert with Virginia’s proposed northern extension of the I-495 Express Lanes and Maryland’s separately proposed managed lanes program for the American Legion Bridge, I-495, and I-270. More details on this study and recent updates may be found on the project website:

<http://drpt.virginia.gov/transit/major-initiatives/i-495american-legion-bridge-transit-and-tdm-study/>

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

5

5 Travel benefits to the region include additional interstate capacity, the provision of a facility to enhance transit service, new travel choices, decreased travel time during peak periods, and reduced length of rush hours. For drivers using the American Legion Memorial Bridge (ALMB), this project would add capacity, improve the existing bottleneck, provide new travel choices, reduce congestion on the existing lanes, and improve travel time reliability across the bridge. For drivers using the George Washington Memorial Parkway (GWMP), this project would add capacity, improve the existing bottleneck at the on-ramps for the I-495 interchange, and reduce the weaving needed to access the GWMP from I-495. For drivers using local and neighborhood roads, this project would reduce cut-through traffic by rerouting vehicles to I-495, and reduce delay and congestion at intersections along adjacent local roads.

The I-495 NEXT EA identified one build alternative which is acceptable under FHWA’s Technical Advisory T 6640.8A. The I-495 NEXT Build Alternative was identified as the only reasonable alternative to advance based on the Purpose and Need for the study. The single build alternative leaves ample flexibility for different designs to be considered when the project advances to permitting and more detailed phases of design following an FHWA NEPA decision. The I-495 NEXT project has independent utility since it would provide a usable facility and be a reasonable expenditure of funds even if no additional transportation improvements in the area are made, including to the ALMB. Reference response 1 for more detail on the alternative process.

The proposed action would encourage carpooling and improve transit on I-495. Reference response 4 for more detail on the transit benefits.



Eric and Meredith Craven  
1326 Timberly Lane  
McLean, VA 22102

October 5, 2020

Abi Lerner, P.E.  
VA Dept of Transportation  
4975 Alliance Drive  
Fairfax, VA 22030

**Re: I-495 Express Lanes Northern Extension Project**

Dear Mr. Lerner:

I am a McLean resident who lives in the **Timberly South** neighborhood. Our community of 84 homes borders the proposed expansion of Interstate 495 as well as the addition of the mixed-used path along the sound wall on our side of the Beltway. I have significant concerns regarding this project.

First, I believe that the circumstances that prompted the plan for the extension of these Express lanes have changed drastically because of Covid, and VDOT needs to go back to the drawing board and assess their necessity. If this project is developed as proposed, the lanes and the mixed-use path will have a dramatic negative impact on the neighborhood in a number of areas.

**Beltway Expansion**

- The proposed beltway widening will encourage increased traffic flow with corresponding increases in tire and engine noise to say nothing of air pollution. The height of the current and proposed sound wall, which we had to pressure VDOT for during the last expansion, is less than the elevation / total height of sound walls along similar portions of I-495 and I-66. Unless the height of the sound wall is increased to a uniform level from the Dulles Access Road to Old Dominion Drive, there will be an increased negative environmental impact on our entire community.
- In addition, expansion of the interstate from the Dulles Access Road to the Legion Bridge without a widening of that bridge and I-495 in Maryland will cause more even more accidents and traffic congestion at the bridge. A postponement of the project until Maryland has finished its plan seems logical and feasible given current traffic demands.

1

2

**Placement of a 10-foot paved path in the Dominion Virginia Power easement**

What does the mixed-use path add to our surrounding neighborhood? Placement of the path along our community's side of the sound wall as well as a 60-foot section that connects the new path to Timberly

*Comment continued on next page*

**1** The height of the noise walls is determined by the noise study. A Final Noise Analysis would be conducted during the final design phase, using the latest design plans, to determine appropriate heights that are required to mitigate noise impacts. The preliminary noise study which took into effect project traffic volumes in the Design Year, showed that the existing noise barrier is adequately providing noise abatement to meet VDOT standards and noise abatement policy requirements, and no modifications have been proposed at the southern end of the noise barrier. Farther to the north, the existing noise wall would need to be replaced to accommodate the proposed design. All proposed replacement barriers are required to meet or exceed the height (top elevation) of the existing noise barriers.

**2** Traffic studies show that the I-495 NEXT project , without the separate Maryland project, would have beneficial impacts:

- Move up to 2,500 more people per hour in both directions combined
- Better accommodate future travel demand
- Reduce cut-through traffic demand on local, neighborhood roads
- Reduce weaving needed to access the George Washington Memorial Parkway

Prior to Maryland's separate project opening, it is projected that there would be:

- A 5 to 24 minute decrease in travel time on the northbound I-495 express lanes during peak periods
- A 4 to 6 minute increase in travel time on the northbound general purpose lanes during peak periods
- The same or better travel times for all Southbound lanes, and for Northbound Lanes during off-peak periods

Maryland is moving forward with their separate environmental study and with their procurement of a separate Developer to design and construct the express/managed lanes in Maryland.



*Comment continued from previous page*

Lane near Lewinsville Road disrupts the current landscape and does not appear to link up with other paths at this time. Such action will:

- Destroy existing wildlife habitat. The Dominion Power easement connects the few remaining patches of parkland in Fairfax County and serves as an avenue along which a variety of wildlife including deer, foxes, raccoons, box turtles, woodchucks and blacksnakes live and travel and avian raptors hunt for food.
- Require the destruction of mature trees, bushes and other native plant species.
- Require substantial storm water management measures to level the proposed trail bed with no discernable benefit to the TSHOA community or potential hikers, bikers or runners.
- Invite nonresidents with motives other than walking, running or cycling to peruse our community for vandalism and theft targets of opportunity. As a bustling and family-oriented neighborhood, Timberly South presents an attractive target.
- Surrounds trail users with high voltage electrical fields with undetermined effects on health and wellness from the three 230 KV lines overhead hanging off of the pylons and also the three buried power lines in the easement.

3

#### Entrance to Timberly South

We question the benefit of the path, other than to satisfy one small element in the overall Fairfax County Trail Plan versus the negative impact on the Timberly South neighborhood.

Construction of the mixed-use path will:

- Destroy the existing entrance to Timberly South, which the TSHOA recently improved by expensive investments in lighting and landscaping.
- Reportedly create a need for a water collection basin approximately 100 feet by 15 feet near the entrance to the Timberly South community.
- Increase the potential for nonresident parking on Timberly Lane. This could mirror the current Scott's Run parking dilemma and hazard.
- Raise the probability of serious accidents on Lewinsville Road as increased traffic try to exit from or onto Lewinsville Road. The entrance onto Lewinsville Road from Timberly Lane is already dangerous, with limited visibility in both directions.

4

Given the above concerns, if VDOT proceeds with the project, I would like answers to the following questions:

1. What are VDOT's plans for the impact on traffic on entry and exit from Timberly Lane onto Lewinsville Road with the addition of construction traffic and interruptions and use of the mixed-use path upon completion?

*Response to this comment is combined with the response to Question 2 on the next page*

2

**3** This multimodal path would be built to be in compliance with the Fairfax County comprehensive plan. Shared-use paths are an integral part of a multimodal transportation system and this portion of trail would help extend the Fairfax County trail network. Shared-use paths in some other portions of Fairfax County also use utility corridors which help to minimize tree loss, since these areas are already required to be clear of trees. The project includes a revegetation program to replace trees lost due to the construction of the project where feasible following construction. In addition, VDOT has committed to providing a tree survey for impacted areas during the design and construction phase of the project, once more detailed plans are available. The tree survey would be used to further document tree impacts and to inform the revegetation plan.

**4** The proposed design does not change the roadway entrance to Timberly Lane from Lewinsville Road. Efforts would be made within the final design and right-of-way process to minimize impacts to the HOA's landscaping at the entrance and compensate the HOA accordingly for any damages or direct impacts to the existing features (lighting, landscaping, etc.) should the land be acquired for the project. In the next phase of the project design, VDOT would refine the stormwater design to continue to try to minimize impacts to the community.

The 495 NEXT project and shared-use path are not expected to increase vehicle traffic on Lewinsville Road or Timberly Lane.

If parking issues arise as a result of the provision of the trail, the community would be able to work with Fairfax County to establish measures to mitigate this issue. For example, the community would be able to request the establishment of a Residential Permit Parking program for this neighborhood.

VDOT is currently working with the Fairfax County Park Authority to provide land at the intersection of Georgetown Pike and Balls Hill Road, which could be developed by the Park as a parking area that could be used by park visitors or trail users.



The response to Question 2 is combined with the response to Question 1 on the previous page


- 2. Will there be a construction equipment staging area in or near Timberly South neighborhood? What construction traffic and road detour interruptions should we expect? Will construction vehicle parking be regulated on Timberly Lane and Lewinsville Road? How will VDOT manage the negative impact?
- 3. What noise abatement parameters will be instituted for construction crews to follow during the construction of this project? i.e. work hours, traffic flow in and out of the neighborhood.
- 4. According to VDOT, the new sound wall will be of "improved material." Prior to installation, will VDOT provide residents with details on the material and height and the wall's ability to reduce decibels?
- 5. Will the drainage pond identified in the plans near the current Timberly Lane entrance be filled with water or primarily dry other than when there are large amounts of precipitation? Who maintains it and ensures that it does not become a swamp? Will there be a fence around this drainage pond?
- 6. Does the new path run the full length of the sound wall without interruption?
- 7. What purpose does the mixed-use path serve that is not already satisfied by other such paths? Where are the users expected to be coming from/going to? Where will users park if they come by automobile? Has the county announced a plan assist the neighborhood with traffic problems?
- 8. How many trees will be removed to create the path? How many of these trees are located in or adjacent to the Timberly South neighborhood? How many trees will replace those lost?
- 9. The TSHOA community is concerned about privacy and security along the new mixed-use path. How will the county ensure maintenance / trash pick-up along the path and security for properties near the path? Will a fence be erected along the path, bordering the Huntmaster Lane lots? What other safeguards for the community will the county provide?
- 10. How will VDOT replace the wall, landscaping, and lighting at the entrance to Timberly South? When will plans be available for review?
- 11. How many acres of TSHOA property will VDOT need to acquire? When will the TSHOA be provided an offer letter for the HOA-owned common area that is needed for this project? What is the process for reviewing and responding to this letter? What options are available other than accepting the offer?
- 12. When will the individual property owners be provided an offer letter for any proposed easements of property required for the project? What options are available other than accepting the offer?

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- 11

Responses to these comments are on the next page

To conclude, our community of 84 homes and 250 voting constituents are greatly disturbed by the fact this project is moving quickly in an unprecedented time with seemingly little on-going direct communication. As individuals and as a neighborhood, we have many questions and concerns about the impact of this project that currently have not been answered. We ask that this project, at minimum, be put on hold until all these questions and concerns are addressed to our satisfaction.

Respectfully,



3 *Meredith Crow*

**5** The Design-Build contractor would be required to work within VDOT-owned land, and to minimize their impact during construction. The contractor would hold Pardon Our Dust or other public meetings prior to major stages of construction to communicate with affected communities how the construction would proceed. Where the sound wall is being impacted and replaced, construction access is expected to be primarily from the highway side of the project.

**6** The contractor is required to work with Fairfax County regarding construction noise, and to seek noise waivers. Access to all driveways and entrances would generally be maintained at all times.

**7** Wall heights and material specifications would be developed as part of the Final Noise Analysis, which would be completed as design is finalized. The final noise analysis would be made available on VDOT's project website. As part of the voting process for new noise wall locations, benefited receptors would have details provided about the height and location of the wall and its expected reduction in decibels.

Noise barriers are generally constructed of concrete panels with an absorptive finish on the roadway side. On bridges or other retaining structures, those noise barrier panels could be a lightweight fiberglass or vinyl panels with baffles.

**8** The stormwater facility at Timberly Lane is preliminarily proposed to be a dry swale. It would fill with stormwater during rain events, but would be designed to infiltrate water into the soil within 24 hours. Note that this facility is subject to change as the design is progressed. VDOT would be responsible to maintain it. It would be fenced.

**9** This section of shared-use path would be continuous between Lewinsville Road and Old Dominion Drive.

**10** The shared-use path would run from Lewinsville Road to Live Oak Drive north of Georgetown Pike, providing off-road connections between neighborhoods, parks, and schools, as well as existing roads. A future connection would be possible to Maryland via the planned American Legion Bridge replacement.

For residential communities with parking issues, Fairfax County has a Residential Permit Parking program that allows for the establishment of parking restrictions in the neighborhood. The establishment of a Residential Permit Parking must be requested by the residential community to Fairfax County.

**11** Efforts would be made in final design to minimize the number of trees that would need to be removed for construction of shared-use path, replacement noise wall, and other project features. The assessment of trees for the purpose of determining revegetation needs would be conducted during final design.



2. Will there be a construction equipment staging area in or near Timberly South neighborhood? What construction traffic and road detour interruptions should we expect? Will construction vehicle parking be regulated on Timberly Lane and Lewinsville Road? How will VDOT manage the negative impact?
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Responses  
to these  
comments  
are on the  
previous  
page

12

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To conclude, our community of 84 homes and 250 voting constituents are greatly disturbed by the fact this project is moving quickly in an unprecedented time with seemingly little on-going direct communication. As individuals and as a neighborhood, we have many questions and concerns about the impact of this project that currently have not been answered. We ask that this project, at minimum, be put on hold until all these questions and concerns are addressed to our satisfaction.

Respectfully,



3 *Meredith Crow*

**12** As the project advances to final design, VDOT would work with the community as it relates to separation and screening of path to identify mitigation strategies. These elements would be addressed as project design and the right-of-way process advance and include discussion with the HOA.

**13** If these features are directly impacted by the project and they are located on private property (or HOA property), then through the right of way acquisition process, damages to those features would be valued in the appraisal and included in the offer to the property owner (or HOA) and negotiated through the right-of-way process. Typically, the contractor would not be making improvements on private property.

**14** The Public Hearing Plans indicate that 0.954 acres of HOA property would need to be acquired (fee simple) and a permanent easement of 0.761 acres would be needed. Efforts would be made during final design to reduce these impacts to the extent practical. VDOT's guide to the right of way process is available online at [https://www.virginiadot.org/business/resources/Right\\_of\\_way/A\\_Guide\\_for\\_Property\\_Owners\\_and\\_Tenants.pdf](https://www.virginiadot.org/business/resources/Right_of_way/A_Guide_for_Property_Owners_and_Tenants.pdf)

**15** The right-of-way acquisition process would begin after the Federal Highway Administration issues a final NEPA decision, and following VDOT approval of the final plans. It is currently anticipated that this process would not begin until early 2022, when an agreement is finalized with VDOT's private partner. VDOT would work with property owners to reach an agreement. In most cases, an agreement is reached. If an agreement is not reached, the courts would determine the compensation.

**16** VDOT has provided responses to the comments from the Timberly South HOA. These responses are posted on the project website and are included in the environmental document. Where possible, VDOT would modify the plans to address these comments. VDOT would continue to stay engaged with the community during the design and construction process to address issues as expeditiously as possible.

Dear Mr. Lerner,

The Tysons Partnership represents a diversified mix of stakeholders in Tysons, Virginia as an emerging urban destination, including employers, residents, workers, and visitors. As an employment center of over 100,000 people, Tysons is an economic powerhouse for Fairfax County and for the region. Consistent with that reality, we are also a regional locus for commuter and other vehicular traffic.

Like most of the Commonwealth, commuting patterns have been significantly disrupted by the COVID-19 pandemic and subsequent rise in telework. However, per VDOT's report in September to the Commonwealth Transportation Board, all of Virginia began to see a rebound in car commutes several months into the pandemic, and that trend continues. Though telework will surely play a role in all our futures, Tysons is designed to be a 24-7 live work play urban center, where people come and go regularly, not virtually. By 2050, Tysons is planned to have 100,000 residents and 200,000 employees. Those residents and employees, as well as tourists, shoppers, business travelers and others, will need flexible, reliable transportation options.

Although the urbanizing future of Tysons is anchored by its four Silver Line Metro stations, the Tysons Comprehensive Plan calls for a multitude of transportation options to benefit both Tysons and the regional economy. Tysons Partnership supports expansion of the transportation network and the increase in travel options that will result from a successful I-495 Express Lanes Northern Extension Project ("495 NEXT") on the Capital Beltway between Tysons and the George Washington Parkway.

These include:

- Express lanes that incentivize carpools, vanpools and bus ridership
- A three-mile shared use path connecting Tysons to local trails and providing more opportunities for pedestrian and cycling commutes into Tysons
- Groundwork for bus rapid transit connections between Virginia and Maryland.

The Partnership asks that VDOT enable realization of the full potential offered by the shared use path through good wayfinding and world class bike/ped infrastructure. We also encourage VDOT to dedicate 495 NEXT toll revenue to transit.

As detailed by the Fairfax County Board of Supervisors in a December 1 letter addressed to Secretary Valentine, completion of the managed lanes on the Maryland side of the Beltway is critical to the Project's ultimate success. Coordinated execution of construction schedules between Virginia and Maryland authorities is therefore imperative. We share the specific concerns flagged by the Fairfax Board of Supervisors regarding the disruptions to neighborhoods and other harms potentially resulting from unresolved disconnects between approaches and timing pursued by Maryland and those of the Commonwealth. We urge VDOT to work with Fairfax County to resolve these concerns and to address issues such as storm water management, tree canopy and other environmental impacts of the 495 NEXT project. We applaud VDOT for all you are doing through this Project and in collaboration with FCDOT aimed at maximizing transit, walking and biking options.

**1** VDOT and Fairfax County continue to coordinate on development plans for a shared use path parallel to I-495 to serve active transportation modes. The signage plan for the 495 NEXT shared-use path would be coordinated with Fairfax County Department of Transportation (FCDOT) during the detailed design phase of the project.

**2** The proposed action would enhance transit on I-495 by providing additional capacity for transit vehicles with new managed lanes in each direction. The Express Lanes would directly encourage carpooling/vanpooling and transit service by providing reliable, faster, toll-free trips for HOV3+ vehicles and transit buses. With respect to subsidies for transit operations, in a November 30, 2020 letter, the Virginia Secretary of Transportation Virginia stated that Virginia is committed to providing dedicated, ongoing support for transit services along this corridor as part of the I-495 NEXT project, and committed to investing funding generated from toll revenues toward the benefit of the users of this corridor. This commitment creates the opportunity for future transit expansion along the corridor.

Under a separate but parallel study that is being coordinated with VDOT, the Virginia Department of Rail and Public Transportation (DRPT) is conducting its I-495 American Legion Bridge Transit and TDM Study in coordination with the Maryland Department of Transportation's Maryland Transit Administration (MTA) to understand the potential for multimodal transportation options that would reduce congestion, improve trip reliability and regional connections, and enhance existing and planned multimodal mobility and connectivity on I-495 and the American Legion Bridge. The recommendations resulting from this study were aimed to work in concert with Virginia's proposed northern extension of the I-495 Express Lanes and Maryland's proposed managed lanes program for the American Legion Bridge, I-495, and I-270. More details on this study and recent updates may be found on the project website:

<http://drpt.virginia.gov/transit/major-initiatives/i-495american-legion-bridge-transit-and-tdm-study/>

**3** The project team has responded directly to the letter from the Fairfax County Board of Supervisors separately from this letter, elaborating on coordination and timing between the Virginia and Maryland projects as well as stated environmental impact concerns. VDOT has been meeting and collaborating with multiple neighborhoods and citizen associations regarding localized issues for the project and potential future construction phasing with Maryland's project. VDOT has coordinated with Fairfax County on strategies to address stormwater management, as well as tree canopy and environmental impacts associated with the 495 NEXT Project.

1

Shared use path

2

Transit

3



Thank you for this opportunity to comment. We look forward to continuing our work with VDOT and with FCDOT aimed at continued economic growth and quality-of-life improvements through the creation and enhancement of effective transportation and mobility options.

Sincerely,  
Sol Glasner

cc: Fairfax County Board of Supervisors

**Sol Glasner**  
President & CEO, Tysons Partnership

**A** [1961 Chain Bridge Road, Suite C205B, Tysons, VA 22102](#)

**D** [703.738.0072](#)

**M** [571.242.0968](#)

**E** [sglasner@tysonspartnership.org](mailto:sglasner@tysonspartnership.org)

**W** [www.tysonspartnership.org](http://www.tysonspartnership.org)



November 17, 2020

VDOT Northern Virginia District Office  
Attn: Abi Lerner, P.E.  
4975 Alliance Drive  
Fairfax, VA 22030

The Tysons Regional Chamber of Commerce wishes to express support for the benefits that the 495 NEXT Project will bring to the greater Tysons Region.

The Tysons area is widely recognized as a national business growth hub. Last year it was reported that Fairfax County has 116 firms on Inc. 5000 list of fastest-growing firms in the US and more than one-third of those in the D.C.-area total.

Tyson's Regional Chamber of Commerce strives to support the growth and viability of area businesses and non-profits. Our goal is to help our members "Make Connections that Matter". We know that the Tysons Region draws both commerce and employees from DC, Maryland and Virginia. Efficient, effective accessibility by both road and public transit supports our businesses, retail and community engagement. This project will help to alleviate congestion, improve safety and reliability at the multiple 495 interchanges that serve Tysons Corner.

The project itself will bring investment, jobs and additional opportunity to attract new businesses to the area with a modern roadway designed to support the substantial growth planned for Tysons.

Please support us with the infrastructure we need to continue the growth and prosperity of the dynamic Tysons Region.

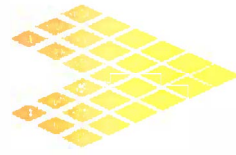
Sincerely,

A handwritten signature in black ink, appearing to be the name "Andrew Clark".

Andrew Clark

Chairman, Tysons Regional Chamber of Commerce

# Virginians for Better Transportation



October 15, 2020

Mr. Abi Lerner, PE  
Virginia Department of Transportation  
Northern Virginia District  
4975 Alliance Drive  
Fairfax, VA 22030

Dear Mr. Lerner:

Virginians for Better Transportation (VBT) is a public education and outreach initiative that advocates for solutions to ensure Virginia's transportation needs are met. VBT was founded in 2005 as a collaboration of business and community leaders concerned about how lack of investment in Virginia's infrastructure was affecting the quality of life for all Virginians and impacting the state's economic stability. VBT has established its reputation as a credible and factual resource for transportation-related issues.

I write today to express our support for the 495 Next Project. This two-mile extension of the current 495 Express Lanes north to the George Washington Memorial Parkway will:

- Dramatically increase safety;
- Reduce travel time;
- Create a viable travel choice that will reduce cut-through traffic on local roads;
- Drive economic development in the area;
- Generate over \$850 million in economic activity during construction; and
- Create over \$6,000 jobs.

Each of these factors alone is important. Combined, the 495 Next Project benefits clearly meet the criteria of responsible and responsive transportation investment for the Northern Virginia region.

Please contact me when VBT can be of further assistance in moving the 495 Next Project forward.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Jeff Perkins', written over a light blue circular stamp.

Jeff Perkins

President – Boxley Materials Company



# COMMONWEALTH of VIRGINIA

## Office of the Governor

Shannon Valentine  
Secretary of Transportation

November 30, 2020

The Honorable Jeffrey C. McKay  
Chairman, Fairfax County Board of Supervisors  
Fairfax County Government Center  
12000 Government Center Parkway, Suite 530  
Fairfax, VA 22035-0079

Dear Chairman McKay,

On behalf of the Commonwealth of Virginia, I offer my sincere appreciation to you and the Fairfax County Board of Supervisors for sharing critical insights and guidance on the development of the I-495 Northern Extension Project (495 NEXT). As the final two and a half miles of I-495 leading up the American Legion Bridge, 495 NEXT is an essential infrastructure project designed to relieve congestion, significantly reduce neighborhood cut-through traffic, and create more seamless mobility in Northern Virginia.

I strongly believe that the value of express lanes to the region is in their ability to move more people and provide reliable, toll-free trips for transit buses and carpoolers. With 495 NEXT improvements, modeling indicates travel time savings of 24 minutes for these users, creating tremendous incentive to adopt these transportation options without regard to when a new American Legion Bridge is built. In January 2020, at my direction, we initiated the I-495/ American Legion Bridge Transit/Transportation Demand Management (TDM) study, which is being conducted jointly by Virginia and Maryland, to identify key transit routes for the 495 corridor. This study is planned to be completed in early 2021.

My purpose today to inform you that Virginia is committed to providing dedicated, ongoing support for transit services along this corridor as a part of the 495 NEXT project. Funding generated from toll revenues will be invested for the benefit of the users of this corridor. This commitment ensures the 495 NEXT project, together with existing 495 Express Lanes, provide multimodal solutions to move more people. I have asked my staff to coordinate with Fairfax County officials in the coming months as we work to finalize the details of this proposal.

This initial commitment creates the opportunity for future transit expansion along the corridor. While integral to Northern Virginia's transportation network, 495 NEXT also serves as the foundation for implementing the Capital Beltway Accord, an agreement in principle made between Governor Northam and Governor Hogan in November 2019 to address one of our



The Honorable Jeffrey C. McKay

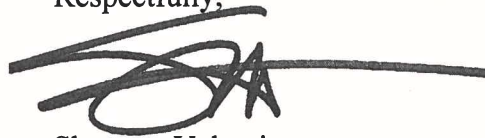
November 30, 2020

Page 2

country's worst traffic chokepoints – the American Legion Bridge. As the Capital Beltway Accord will outline how Virginia's 495 NEXT will interface with Maryland's I-495 and I-270 Managed Lanes project, Secretary Slater and I have also expressed our commitment to delivering transit alternatives across the transportation network.

Recognizing your leadership, the collaboration among the staff of VDOT and Fairfax County, this initial transit investment through Project NEXT, and a sustained commitment to identifying multimodal solutions, we look forward to serving this vital region and our Commonwealth – together.

Respectfully,

A handwritten signature in black ink, appearing to be 'SA', with a long horizontal line extending to the right.

Shannon Valentine

cc: Nick Donohue, Deputy Secretary of Transportation  
John Lawson, Deputy Secretary of Transportation  
Stephen Brich, Commissioner, Virginia Department of Transportation  
Rob Cary, Chief Deputy Commissioner, Virginia Department of Transportation  
Jennifer Mitchell, Director, Virginia Department of Rail and Public Transportation



# COMMONWEALTH of VIRGINIA

DEPARTMENT OF TRANSPORTATION  
1401 EAST BROAD STREET  
RICHMOND, VIRGINIA 23219 2000

**Stephen Brich**  
Commissioner

February 22, 2021

The Honorable Jeffrey C. McKay  
Chairman, Fairfax County Board of Supervisors  
Fairfax County Government Center  
12000 Government Center Parkway, Suite 530  
Fairfax, VA 22035-0079

Dear Chairman McKay,

On behalf of Secretary Valentine and the Virginia Department of Transportation (VDOT), I offer my appreciation to you and the County for providing two comprehensive letters on December 3, 2020 regarding the I-495 Northern Extension Project's Environmental Assessment and Design. Since the October 2020 Public Hearing on this project, and after receiving comments from key stakeholders, neighborhood and community groups, VDOT staff have been actively working with the community and Fairfax County staff to identify solutions.

Additionally, the Commonwealth has been very encouraged by Maryland's progress on their I-270/I-495 Traffic Relief Program. Maryland recently announced their Preferred Alternative, which includes 2 Managed Lanes in each direction on I-495 allowing HOV-3 vehicles to use these managed lanes for free and a new bicycle and pedestrian connection across the American Legion Memorial Bridge. Additionally, on February 19, 2021, Maryland announced the selection of their private development partner. The Commonwealth continues to work closely with Maryland's team to ensure a seamless, regional approach to providing managed lanes in the Washington-Metropolitan region. All of this is welcome news as both states work collaboratively to address the transportation needs in this corridor.

I am pleased with the significant progress on many key issues that has resulted from joint our coordination efforts. Commitments have been made by VDOT, as well as our private development partner, to address many of the items raised in the County's letters. I want to thank Fairfax County staff for their tremendous efforts in working with VDOT to resolve these items. There are a few remaining items that VDOT and County staff continue to collaborate on to finalize. As Secretary Valentine shared with you in her November 30, 2020 letter, I also want to take this opportunity to reiterate that the Commonwealth continues to be committed to providing dedicated, ongoing support for transit services along this corridor as part of the 495 NEXT project.

The issues identified by Fairfax County are important to VDOT, and will continue to be an important part of the dialog as we work together to solve one of the Washington Metropolitan area's most congested transportation links. Through the continued collaboration among the staff of VDOT and Fairfax County, I am confident that a multi-modal transportation solution can be put in place, which will improve travel and make a positive impact on our Commonwealth.

Respectfully,

A handwritten signature in black ink, appearing to read "Robert H. Cary". The signature is fluid and cursive, with the first name "Robert" being the most prominent.

Robert H. Cary, PE, LS  
Chief Deputy Commissioner

Cc: Shannon Valentine, Secretary of Transportation  
Nick Donohue, Deputy Secretary of Transportation  
John Lawson, Deputy Secretary of Transportation  
Stephen Brich, Commissioner, Virginia Department of Transportation  
Tom Biesiadny, Fairfax County  
Martha Coello, Fairfax County  
Helen Cuervo, District Administrator Northern Virginia, Virginia Department of Transportation



THE VOICE of BUSINESS

October 29, 2020

The Honorable Shannon Valentine  
Secretary of Transportation  
P.O. Box 1475  
Richmond, VA 23218

RE: 495 Express Lanes Northern Extension Project

Dear Secretary Valentine:

On behalf of the Virginia Chamber of Commerce, I urge you to support the 495 NEXT project to extend the 495 Express Lanes to the George Washington Memorial Parkway.

The Virginia Chamber of Commerce is the largest business advocacy organization in the Commonwealth, with more than 26,000 members. The Chamber is a non-partisan, business advocacy organization that works in the legislative, regulatory, and political arenas to act as the catalyst for positive change in all areas of economic development and competitiveness for Virginia. In order to maintain our position as a top business destination we must continue to invest in developing a 21st century transportation network aimed at improving our mobility.

That 21st century transportation network requires both public sector investments as well as leveraging private sector investment and innovation. That is why we strongly support the 495 NEXT project that will extend the 495 Express Lanes to the George Washington Memorial Parkway. 495 NEXT will create more than 6,000 jobs and inject more than \$800 million in economic activity into the region. Most importantly, it will help reduce congestion in the region and provide additional travel choices for commuters and travelers.

The 495 NEXT extension will aid the Commonwealth in more efficiently moving people and goods, improve safety and improve the quality of life for all travelers, and lay the groundwork for long term economic growth. We strongly support this project.

Best regards,

A handwritten signature in black ink that reads "Barry E. DuVal". The signature is written in a cursive, flowing style.

Barry E. DuVal  
President and CEO



September 30, 2020

VDOT  
495NorthernExtension@VDOT.virginia.gov

Dear VDOT:

VTA supports ensuring access and funding of multimodal transportation along the 495 Corridor through the 495 NEXT project. Extending the 495 Express Lanes North to the George Washington Memorial Parkway (GWMP) is the logical next step to reduce congestion in the Northern Virginia region. Extending the Express Lanes network will provide a new, more efficient travel choice, add much needed capacity to this section of I-495, reduce crashes in the area, and provide valuable benefits to the region and its transit agencies. Although the Express Lanes are not dedicated transit lanes, they do serve as a form of bus rapid transit lanes as the congestion pricing provides free-flow conditions for buses and HOV travelers at no cost, moving more people in fewer vehicles. The proposed bike/ped trail will also enhance the multimodal options throughout the corridor.

The key to a successful transit line is to provide the riders predictability and reliability. The Express Lanes have introduced (before the COVID-19 pandemic) exponential growth in bus trips on I-495 since the opening of the Express Lanes in late 2012. The ability for buses to skip the congestion and arrive on time has helped transit agencies grow their ridership, add new trips, and streamline their operations. We have every expectation that ridership will continue to grow as employees return to their workplaces.

The 495 NEXT project will help connect two of the most important economic hubs in the Commonwealth, Tysons Corner in Fairfax County and Crystal City in Arlington County. By providing this form of bus rapid transit, the Commonwealth will present Arlington County and Fairfax County the opportunity to introduce new bus routes and increase the frequency on existing bus routes between their localities. Ensuring increased access and on-time arrival for commuters will be a significant step toward restoring our workplace economy.

The Express Lanes also provide valuable environmental benefits. By incentivizing travel by HOV or by transit, the Express Lanes reduce the number of cars on the roads and the number of trips that travel through the corridor. Extending the Express Lanes to this important connection at the GWMP will help move more

---

people in fewer vehicles, thereby reducing greenhouse gases that affect our air quality and subsequently our health and our economy.

The Express Lanes have been a valuable asset for transit agencies in Northern Virginia as the goal of the Express Lanes is to move more people - not more cars. The Express Lanes provide an incentive for people to travel together in HOV and to utilize transit options. Expanding and funding multimodal options in the 495 NEXT project will optimize mobility and improve the region's economy.

Thank you for this opportunity to provide comment.

Sincerely,

A handwritten signature in black ink that reads "Lisa M. Guthrie". The signature is written in a cursive style with a large initial "L" and a distinct "M" and "G".

Lisa Guthrie  
Executive Director



VDOT Northern Virginia District Office  
Attn: Abi Lerner, P.E.  
4975 Alliance Drive  
Fairfax, VA 22030

October 8, 2020

**RE: 495 Express Lanes Northern Extension Project**

Dear Mr. Lerner,

Representing more than 300 companies and tens of thousands of employees, Virginia Transportation Construction Alliance (VTCA) is dedicated to serving the transportation construction interests in the Commonwealth – seeking solutions which benefit the communities in which we work and live.

In Northern Virginia, traffic congestion impacts everyone’s quality of life on a daily basis more so than any other part of the Commonwealth. Utilizing multiple tools is necessary to address this need. One near term solution is the proposed 495 NEXT – extension of the 495 Express Lanes north.

We write to express our support for the extension of the 495 Express Lanes north to the George Washington Memorial Parkway. This effort will allow transit and carpoolers to bypass congestion with a faster toll free trip. This provides an option for faster, more reliable travel that will reduce users and non-users commuting time and cut down on cut-through traffic that now impacts local neighborhoods. We believe 495 Express Lanes will:

1. Set the stage for the Capital Beltway Accord project – the vital rebuild of the American Legion Bridge and extension of the Express Lanes into Maryland
2. Provide an option for faster, more reliable travel – reducing commuting times by 50% during rush hour for those who choose to use the Express Lanes
3. Allow transit and carpools to bypass congestion with a faster toll free experience
4. Improve safety on 495 by reducing the number of accidents by 20%

The benefits outside of traffic congestion relief are also significant. This project’s 3-mile shared use path will connect to local trails and greatly enhance bicycle and pedestrian travel. The economic impact will continue to provide thousands of jobs at all levels of construction design and execution.

Cordially,

A handwritten signature in black ink, appearing to read "Gordon Dixon".

Gordon Dixon  
Executive Vice President

# Washington Airports Task Force



www.washingtonairports.com

## Washington Airports Task Force Comment on the 495 Next Project October 26, 2020

The Washington Airports Task Force (WATF) supports the 495 Next Project as a critical first step to easing traffic congestion in Northern Virginia. The next logical step will be to identify a location for a second Potomac River Crossing. The WATF sees both as absolutely necessary to improve the quality of life for residents who spend way too much time in traffic on the beltway when trying to get to work, our airports, or home.

The WATF is a non-profit, 501(C)(3) organization dedicated to promoting the expansion and enhancement of aviation services for Virginia and the National Capital Region. We support enhanced connectivity in order to drive economic development and job creation. At a time when our region is struggling to cope with the economic consequences of the COVID-19 pandemic, this 100% privately-funded project will create thousands of new jobs and inject hundreds of millions of new dollars into our economy and improve access to our major international airport, Dulles.

The 495 Next Project is critical to Northern Virginia's transportation future. In addition to expanding travel capacity, creating new travel options, and relieving congestion at one of the area's worst bottlenecks, it is an essential component of an integrated express lanes network – one of this area's top long-range transportation priorities.

Expanding the region's HOT Lanes Network improves all modes of transportation in the 495 corridor. In addition to dramatically reducing congestion and delays for both managed lane and general-purpose lane users, HOT Lanes incentivize more carpooling and transit ridership by dramatically increasing the reliability of both modes for free. Additionally, this project's 3-mile shared use path will connect to local trails and greatly enhance bicycle and pedestrian travel.

Thank you,



Keith W. Meurlin, President  
Washington Airports Task Force  
44701 Propeller Court, Suite 100  
Dulles, VA 20166 (703) 572-8714  
[www.washingtonairports.com](http://www.washingtonairports.com)

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**Paul J. Wiedefeld, A.A.E.**  
WMATA

**The Honorable Anthony A. Williams**  
Federal City Council



**Appendix F: Public Hearing Summary, Transcripts, and  
Responses to Public Comments Received following Public  
Hearing**

**495 EXPRESS LANES NORTHERN EXTENSION STUDY  
PUBLIC HEARING SUMMARY AND PUBLIC COMMENT REPORT  
VIRTUAL HEARING: OCTOBER 5, 2020  
IN-PERSON HEARING: OCTOBER 8, 2020  
Federal: NHPP-495-5(095), State: 0495-029-419, UPC: 113414**



The Virginia Department of Transportation (VDOT) held Location and Design Public Hearings on October 5 and 8, 2020, to present the Environmental Assessment and draft design plans to extend the I-495 Express Lanes by approximately three miles from the Dulles Toll Road interchange to the George Washington Memorial Parkway in the vicinity of the American Legion Bridge to reduce congestion, improve safety and travel reliability, and provide additional travel choices. This project will involve a change in limited access control.

Originally, the project's Location and Design Public Hearing was scheduled for March 12, 2020, but was postponed due to the COVID-19 pandemic. The rescheduled Location and Design Public Hearing took place virtually on October 5, 2020, from 7 - 9:30 p.m., featuring a presentation and public comment period. The public joined this virtual hearing through WebEx and telephone, and watched on VDOT's YouTube Live Channel. In addition, an in-person, by-appointment-only, hearing was held on October 8, 2020, from 4 – 8 p.m. at the McLean Community Center. This in-person session offered people the opportunity to meet with project leadership (in-person) and subject matter experts (remotely) to ask questions and provide feedback and official comments on the project. A video presentation was provided, and a court reporter was present at the in-person hearing to receive formal comments from attendees. Health safety measures including mask requirements and social distancing were in place, as recommended by the Center for Disease Control (CDC).

Project materials, including the brochure, comment sheet, presentation and exhibits, were made available for the public hearing initially scheduled on March 12, 2020, on the study's website ([495northernextension.org](http://495northernextension.org)) on February 26, 2020. The public was invited to submit comments by mail, email, or online form, as well as orally or electronically during the virtual public hearing on Oct. 5, 2020, and in writing or individually to the court reporter at the in-person public hearing on Oct. 8, 2020. The deadline for comments to be included in the public hearing summary report was initially set for October 23, 2020, but was extended until December 4, 2020, to allow for additional outreach by VDOT to surrounding communities.

Prior to the hearings, VDOT offered two virtual question-and-answer sessions for the public on September 28 and 30, 2020.

**Virtual Public Hearing Attendance:**

- More than 180 people participated in the virtual public hearings (Note: Exact numbers are unknown due to some individuals joining multiple times and other connections that had multiple people present.)
  - WebEx: approximately 184 participants

- Telephone: approximately 12 participants
- YouTube: approximately 24 people watched live on VDOT's YouTube Live Channel at <https://www.youtube.com/channel/UCrUxlE2IC-oT99lj2X5TGig>. Additionally, there were 79 views of the meeting recording on the 495 NEXT project website and/or VDOT's YouTube Live channel through March 24, 2021.
- Elected officials in attendance included Senator Barbara Favola (District 31), Delegate Kathleen Murphy (District 34), Supervisor John Foust (Fairfax County Board of Supervisors Dranesville District) and Mary Hynes (Commonwealth Transportation Board Northern Virginia District Member), and a representative from the Fairfax County Board of Supervisors Providence District
- No media attended

#### **In-Person Public Hearing Attendance:**

- 25 people attended the in-person public hearing along with limited project team and FCDOT staff (attendance was limited to by appointment only as part of COVID-19 protocols)
- No elected officials attended
- No media attended

#### **Comments Provided during the Public Hearings:**

- 29 people provided comments during the virtual public hearing, including representatives of Southern Environmental Law Center, McLean Citizens Association, Northern Virginia Transportation Alliance, Virginia Sierra Club, Northern Virginia Chamber of Commerce, 495 Matters, Virginia Parks Matter, and Greater McLean Chamber of Commerce
- 4 comment sheets were submitted at the in-person public hearing
- 8 individual comments were provided to the court reporter at the in-person public hearing

#### **Comments Provided by Mail, Email or Online:**

- 720 comments were received by mail, email or online, including:
  - 60 comment sheets and letters were received by mail or in-person
  - 417 comments were received by email
  - 243 comments were submitted online at [495northernextension.org](http://495northernextension.org)
  - Organizations submitting comments included the 2030 Group, Alexandria Chamber of Commerce, Apartment & Office Building Association of Metropolitan Washington, Arlington Chamber of Commerce, Audubon Naturalist Society, Coalition for Smarter Growth, Dulles Area Transportation Association, Fairfax Alliance for Better Bicycling, Great Falls Citizens Association, Greater Reston Chamber of Commerce, Greater Springfield Chamber of Commerce, Greater

- Washington Partnership, McLean Citizens Association, Mount Vernon-Lee Chamber of Commerce, NAIOP, National Parks Conservation Alliance, Northern Virginia Building Industry Association, Northern Virginia Chamber of Commerce, Northern Virginia Citizens Association, Northern Virginia Transportation Alliance, Prince William Chamber of Commerce, Saigon Citizens Association, Sierra Club Virginia Chapter, Southern Environmental Law Center, Timberly South HOA, Tysons Partnership, Tysons Regional Chamber of Commerce, Virginia Chamber of Commerce, Virginia Transit Association, Virginia Transportation Construction Alliance, Virginians for Better Transportation, Washington Airports Task Force, Washington Area New Automobile Dealers Association
- Government agencies included Environmental Protection Agency, Fairfax County Board of Supervisors, Fairfax County Park Authority, National Park Service

### **Summary of Comments and Responses:**

Comments and questions received during the comment period, which was open from February 12, 2020 until December 4, 2020, are summarized and responded to in Attachment A. Attachment B includes the full text of all public comments received. Attachment C is the court reporter's transcript of the public comment session held during the October 5, 2020, virtual public hearing. Attachment D is the court reporter's transcript of the public comment session held during the October 8, 2020, in-person public hearing.

Comments and questions covered a range of topics to include:

- 495 NEXT needs to be coordinated with Maryland Managed Lanes Project and the project should not be built until Maryland upgrades the American Legion Bridge
- Why was an EA done instead of an EIS? Why was only one build alternative studied?
- Questions about traffic impact/benefits prior to Maryland's upgrades to the American Legion Bridge
- The project should be delayed until long-term traffic impact of COVID-19 is known
- Questions about Transurban involvement in 495 NEXT
- Provide transit funding commitment on I-495
- Support for shared-use path, locating it on non-highway side of the noise wall
- Concern about elevated ramps and phasing at Dulles Toll Road, George Washington Memorial Parkway interchanges
- Noise mitigation, new noise walls will be needed
- Concern about stormwater and wetland impacts, including Scotts Run
- Concern about tree clearing and replacement
- Concern about construction-related noise, traffic, and access to residences
- Concerns about local intersection operations near I-495



VIRGINIA DEPARTMENT OF TRANSPORTATION

\* \* \* \* \*

495 EXPRESS LANES  
NORTHERN EXTENSION

Location and Design Public Hearing

October 5, 2020

Virtual Meeting via WebEx

P R E S E N T

(Via WebEx)

**MICHELLE HOLLAND**

Communications Manager, Northern Virginia Megaprojects  
Virginia Department of Transportation

**SUSAN SHAW, P.E.**

Director, Northern Virginia Megaprojects  
Virginia Department of Transportation

**ABI LERNER, P.E.**

495 NEXT Project Manager  
Virginia Department of Transportation

**ROBERT CARY, PE L.S.**

Chief Deputy Commissioner  
Virginia Department of Transportation

**HELEN CUERVO, PE**

Northern Virginia District Engineer  
Virginia Department of Transportation

**MARY HYNES**

Northern Virginia District Member  
Commonwealth Transportation Board

## PRESENTATION

MICHELLE HOLLAND	INTRODUCTION	PAGE 5
SUSAN SHAW		PAGE 7
ABI LERNER		PAGE 9
SUSAN SHAW		PAGE 29
PUBLIC COMMENTS		PAGE 37
SUPERVISOR FOUST		PAGE 117
DELEGATE MURPHY		PAGE 120
ROBERT CARY		PAGE 121
SUSAN SHAW		PAGE 122
MICHELLE HOLLAND	CLOSING	PAGE 123

## P R O C E E D I N G S

1  
2 MS. HOLLAND: Good evening everyone and  
3 welcome to the Virginia Department of Transportation's I-  
4 495 Express Lanes Northern Extension Location and Design  
5 Public Hearing.

6 My name is Michelle Holland. I'm with VDOT's  
7 Northern Virginia Megaprojects Program and I will be  
8 acting as your host at this evenings hearing.

9 Next slide.

10 I'm going to go through what will take place  
11 at tonight's hearing.

12 Next slide, please. Thank you.

13 Tonight's public hearing includes a formal  
14 presentation of the Environmental Assessment findings and  
15 draft design plans for the 495 project.

16 Following the presentation, we will have our  
17 public comment session. We will begin with the  
18 preregistered speakers, followed by others wanting to  
19 provide comments tonight.

20 We are asking speakers to limit their comments  
21 to three minutes if speaking as an individual and five  
22 minutes if you are speaking for a group.

23 If time allows following all public comments,



1 we will open it up to questions and answers.

2 We will go over specific instructions once we  
3 get through our presentation and we start our comment  
4 period, but if you have preregistered to speak, you will  
5 be called upon first to provide your comments.

6 Tonight's hearing is being streamed live and  
7 recorded on VDOT's live YouTube Channel. The recording of  
8 tonight's hearing will be shared after the meeting on our  
9 project website, [495NorthernExtension.org](http://495NorthernExtension.org).

10 I want to make sure that everyone knows that  
11 we are asking all attendees to be muted, to mute your  
12 lines throughout the duration of the meeting. This is to  
13 minimize background noise and ensure that all participants  
14 can hear.

15 If you are having any technical difficulties,  
16 we would ask that you please call 703-691-6715. Again  
17 that number is 703-691-6715 for any technical  
18 difficulties.

19 Before we get started this evening with our  
20 presentation, there are some introductions that I'd like  
21 to make. I'd like to introduce and thank Delegate Murphy  
22 for joining us this evening. Supervisor Foust, thank you  
23 for joining us.

1 I'd like to introduce some officials from  
2 our VDOT team that have joined us tonight. Rob Cary, who  
3 is here. Rob is our Deputy Commissioner for VDOT.

4 MR. CARY: Thank you, Michelle.

5 MS. HOLLAND: Helen Cuervo is VDOT's Northern  
6 Virginia District Administrator. Thank you for joining us  
7 this evening.

8 MS. CUERVO: Thank you.

9 MS. HOLLAND: Susan Shaw is VDOT's  
10 Megaprojects director in Northern Virginia and Abi Lerner,  
11 who is our project manager for the 495 project.

12 I also would like to welcome Mary Hynes, our  
13 Commonwealth Transportation Board member for Northern  
14 Virginia. Thank you for joining us this evening.

15 We also have a representative from Supervisor  
16 Dalia Palchik's office with us this evening.

17 If I've missed elected officials or other  
18 officials that would like to introduce themselves, if you  
19 would please do so at this time.

20 (No response)

21 MS. HOLLAND: Hearing none, we're going to go  
22 ahead and get started.

23 I'd like to go ahead and hand it over to

1 Susan Shaw to kick off our hearing this evening. Thank  
2 you.

3 MS. SHAW: Thank you, Michelle.

4 In this presentation we will provide an  
5 overview of 495 NEXT, a summary of findings from the  
6 project's Environmental Assessment and an update on the  
7 projects produced design and changes to the limited access  
8 line along I-495.

9 We will also cover coordination with local and  
10 regional stakeholders, describe a transit study being  
11 conducted for the corridor, discuss next steps and let you  
12 know how you can provide comments on the project.

13 The 495 NEXT project, as you can see from this  
14 project overview on Slide 4, involves extending the 495  
15 Express Lanes to the north by about three miles from the  
16 current terminus near the Dulles Toll Road to the George  
17 Washington Memorial Parkway in the vicinity of the  
18 American Legion Bridge.

19 The project includes replacing existing  
20 bridges at Live Oak Drive, Georgetown Pike, Old Dominion  
21 Drive and 495 North over the Dulles Toll Road. It  
22 includes widening the I-495 bridge over Scott's Run and  
23 improving the George Washington Memorial Parkway Bridges

1 over 495.

2 The project also includes building new bike  
3 and pedestrian paths along I-495 and on the new  
4 overpasses.

5 Existing noise walls along the corridor will  
6 be replaced and extended and new noise walls will be built  
7 if needed.

8 In addition, storm water management facilities  
9 will be provided to address water runoff from the project.

10 The goals of the project are to reduce  
11 congestion on I-495 and nearby roadways, to provide  
12 additional travel choices on I-495, to improve travel  
13 reliability and also to enhance safety in the project  
14 corridor.

15 New Express Lanes access ramps, represented by  
16 the orange arrows, will be provided at two interchanges.  
17 On the left, at the Dulles Toll Road interchange, there  
18 will be ramps from the Dulles Toll Road and airport access  
19 road or Route 267, to the northbound 495 Express Lanes and  
20 from the southbound 495 Express Lanes to the Dulles  
21 Connector Road.

22 On the right-hand side of the slide you see  
23 the GW Memorial Parkway interchange. There will be ramps



1 from the northbound 495 Express Lanes to the parkway  
2 going towards D.C. and from the westbound parkway to the  
3 southbound 495 Express Lanes.

4 VDOT is coordinating with the State of  
5 Maryland on proposed roadway improvements on the American  
6 Legion Bridge. Maryland is currently completing a study  
7 to add lanes and implement a connected managed lanes  
8 network on the Capitol Beltway from the American Legion  
9 Bridge up to River Road, which is shown in the dashed  
10 line.

11 Maryland is conducting its own project  
12 evaluating the addition of managed lanes on both I-495 and  
13 on I-270.

14 On the next slide we can see the project  
15 benefits. The 495 project will improve travel on I-495  
16 and along other roadways near the project corridor.

17 The map shown here is a screen capture from an  
18 evening rush hour in May 2018 and is typical of roadway  
19 conditions during peak periods on what has been identified  
20 as the most congested segment of the interstate in the  
21 Washington area region.

22 The extended Express Lanes will help move more  
23 people through the I-495 corridor by adding new capacity

1 and providing new travel choices with Express Lanes for  
2 carpools, buses and toll-paying drivers. Additionally,  
3 drivers on I-495 will experience faster and more reliable  
4 travel times during peak periods.

5 Improved travel on I-495 will benefit local  
6 roads as well by reducing cut-through traffic. The  
7 project will enhance safety, both on and off I-495 with  
8 lower travel volumes on local roads and less traffic  
9 weaving on I-495 to access the GW Memorial Parkway.

10 And now I'd like to turn it over to Abi  
11 Lerner, our project manager, who is going to go through  
12 some slides on our environmental process as well as our  
13 traffic analysis.

14 Abi.

15 MR. LERNER: Thank you, Susan.

16 VDOT is following the federally required  
17 process for evaluating environmental impacts for the  
18 project. The National Environmental Policy Act, sometimes  
19 called NEPA, requires that we consider the potential  
20 environmental consequences of the project; document the  
21 environmental analyses; and make the information available  
22 to the public for comment.

23 The purpose of our outreach and public hearing

1 process is to provide information and receive comments  
2 and input on the proposed project and the findings of our  
3 Environmental Assessment.

4 Information related to our Environmental  
5 Assessment has been available on our project website,  
6 495NorthernExtension.org, since February 26, 2020.

7 MALE VOICE: Are you on?

8 FEMALE VOICE: You (Unintelligible) again.

9 MALE VOICE: You just go on the ...

10 MALE VOICE: Abi, please unmute yourself. I  
11 went ahead and muted the people in the background.

12 MR. LERNER: VDOT is following the federally  
13 required process for evaluating environmental impacts of  
14 the project.

15 Did I -- okay, do I need to do this slide  
16 again? Did you hear -- did that come through?

17 MALE VOICE: We hear you now there's --

18 MS. SHAW: No, we heard this -- we heard this  
19 slide. It's when you moved to the next one about the  
20 technical studies.

21 MR. LERNER: Oh, okay. Okay.

22 VDOT conducted an Environmental Assessment,  
23 referred to as an EA, to identify potential impacts the

1 proposed 495 NEXT Project would have on the environmental  
2 resources. We studied natural environment, such as  
3 streams and habitat and the human environment such as air  
4 quality and noise.

5 Shown here are the technical studies that were  
6 completed to support the EA.

7 In April of 2018 the project design team  
8 established a large study area shown by the dashed outline  
9 on the map that you see here. The study area is generally  
10 500 feet on either side of the Beltway and along  
11 intersecting roadways and the adjacent intersections.

12 We then identified and gathered data about  
13 environmental resources within the study area. As the  
14 project design was developed, we anticipated limits of  
15 disturbance, or LOD, which is a smaller area within the  
16 study area was established.

17 Potential project impacts to resources within  
18 the LOD were then quantified. The LOD represents the  
19 largest likely project footprint and impacts within the  
20 LOD are reported in the environmental analysis and are  
21 shown in our design boards and the environmental document,  
22 which are available on the project website.

23 As the project progresses, the goal will be



1 to minimize the project footprint farther within the LOD.

2 Next slide.

3 The potential impacts shown here detailed in  
4 the project's Environmental Assessment forms and technical  
5 reports, which are available on the project website.

6 The 495 NEXT Project is expected to need  
7 partial lawn acquisitions from 89 properties. No  
8 residential or business relocations are expected to be  
9 needed. There are several community facilities along the  
10 corridor and potential impacts are summarized in the EA.

11 The George Washington Memorial Parkway, owned  
12 by the National Park Service, was identified as the only  
13 property within the LOD, the only historic property within  
14 the LOD. The Parkway is known for its landscape  
15 architecture and commemoration of George Washington, and  
16 consists of parks and trails of over 7600 acres.

17 VDOT has been working with the National Park  
18 Service to minimize the impact for the parkway. Rendering  
19 the various options to mitigate impacts are shown in the  
20 George Washington Memorial Parkway visualization booklet,  
21 which is available on our website.

22 VDOT has also coordinated with the Fairfax  
23 County Park Authority on how best to minimize impact to

1 its properties, the Scott's Run Nature Preserve, a 336  
2 Acre preserve located in McLean north of Georgetown Pike  
3 and west of the I-495 corridor. Scott's Run Preserve is  
4 a publically-accessible, recreational area.

5 The 495 Project would have minimal impacts on  
6 these two park properties and VDOT has identified  
7 mitigation strategies for these impacts.

8 A preliminary noise study was completed based  
9 on the project draft design plans. Study results are  
10 available on the project website and will be discussed  
11 later in the presentation.

12 The air quality analysis indicated that the  
13 495 project would not adversely impact air quality. The  
14 project would meet all applicable federal and state  
15 regulatory requirements as well as air quality guidance  
16 under the Federal National Environmental Protection Law.

17 The project would not cause or contribute to a  
18 new violation of the National Ambient Air Quality  
19 Standards established by the U.S. Environmental Protection  
20 Agency.

21 Natural resources, such as wetlands, streams  
22 and wildlife habitat, are located within the LOD and may  
23 be impacted. During the project's preliminary design

1 process, the project's footprint has been refined and  
2 reduced to minimize impact. As the project's design  
3 continues to be refined, the team will work to further  
4 reduce the project footprint and impacts.

5 As far as the Environmental Assessment, a  
6 traffic analysis was conducted. The team studied the  
7 operation impacts of the proposed 495 project looking at  
8 the project footprint shown in yellow, the surrounding  
9 highway network shown in green. Okay, yeah, let's stay  
10 on this slide, shown in green, and local roads shown in  
11 blue.

12 The traffic analysis looked at potential  
13 impacts to thirty nearby intersections. Our traffic  
14 engineers studied the project's impact on those roadways  
15 using the required regional traffic forecasting models  
16 that contains current traffic volumes, as well as traffic  
17 projections that take into account the region's future  
18 land use plans, land use plans and transportation  
19 improvements and change.

20 It's important to note that the Maryland's  
21 proposed project of the two new managed lanes in each  
22 direction on I-495 in Maryland is included in this  
23 regional traffic model.

1 VDOT's traffic analysis is based on two time  
2 horizons, year 2025 or just after the planned opening of  
3 the 495 NEXT Express Lanes, and the future design year of  
4 2045.

5 The interim year of 2025, was analyzed for  
6 two scenarios. One, prior to and one following the  
7 completion of the Maryland's managed lanes project. The  
8 2045 design year was analyzed assuming that the Maryland  
9 project improvements would be in place.

10 For each horizon year, 2025 and 2045, the  
11 project team looked at build versus no-build scenarios.  
12 The build scenario would be building the proposed 495 NEXT  
13 Project to compare travel times, traffic delay, person  
14 throughput and impacts on secondary streets.

15 VDOT's traffic analysis shows that the 495  
16 NEXT Project will move more people compared to existing  
17 conditions and compared to future conditions without the  
18 project.

19 For the design year of 2045, the project is  
20 anticipated to move 7600 more people per hour throughout  
21 the project study area in the northbound and southbound  
22 directions as compared to the 2045 no-build scenario.

23 Similarly, in the interim year of 2025, the



1 project would move 5400 more people than the no-build,  
2 with Maryland's managed lanes project in place and 2500  
3 more people per hour prior to Maryland's project being  
4 implemented.

5 The traffic analysis shows the Express Lanes,  
6 495 Northern Extension Project, will reduce cut-through  
7 traffic on local roads in all three scenarios that were  
8 analyzed. These three scenarios are 2025 with Maryland  
9 managed lanes, 2025 prior to Maryland managed lanes, and  
10 2045 design year.

11 In 2019, heavy congestion on I-495 resulted in  
12 travelers diverting onto parallel roads and local streets  
13 in the northbound and southbound directions. By  
14 increasing the person carrying capacity of I-495 and by  
15 providing a reliable travel option using the I-495 Express  
16 Lanes, drivers will have an incentive -- will have less  
17 incentive to use local cut-through routes.

18 Looking at 2045 and both 2025 scenarios,  
19 building the project will improve level of service and  
20 local street intersections in the study area.

21 Reductions in travel demand will result in  
22 delay reductions on Georgetown Pike. These improvements  
23 on local roads applied to both the 2025 build scenarios

1 with Maryland's managed lanes in place and prior to the  
2 completion of the Maryland project.

3 For example, the number of intersections  
4 operated at level of service A through D, shown in the  
5 first row of the table, increases in the build scenario  
6 compared with not building the project for all three  
7 scenarios.

8 Prior to Maryland's project being in place,  
9 53 percent of the intersections operate at level of  
10 service A through D in the no-build compared to 57 percent  
11 of the intersections in the build scenario. As seen in  
12 the center column once the Maryland Express Lanes are in  
13 place, 60 percent of the intersections operate at level  
14 service D or better.

15 Conversely, the number of intersections that  
16 operate at level of service F decreases in the no-build  
17 condition compare -- decreases in the build condition  
18 compared to the no-build for all three scenarios.

19 As we look at the bottom parts under the  
20 table, the analysis results show that traffic demand on  
21 local streets intersecting with Georgetown Pike decreases  
22 across all three scenarios. In 2025 with Maryland's  
23 project in place, the traffic demand at Georgetown Pike

1 intersections was reduced by 14 percent in the build  
2 scenario compared with the no-build, and prior to  
3 Maryland's project being built the traffic reduction would  
4 be 9 percent in the build scenario.

5 As a result of the reduction in traffic demand  
6 on local streets associated with the 495 NEXT Project, the  
7 build scenario shows notable improvements in the delay  
8 experience at Georgetown Pike intersections.

9 Looking at the bottom row of the table, the  
10 reductions in delay ranges between 40 and 49 percent when  
11 comparing the build versus the no-build for all three  
12 scenarios.

13 MR. CARY: Hey, Abi, this is Rob Cary. Could  
14 you go back to that slide. I just want to -- I know we  
15 have a lot of people on here that are not engineers and I  
16 just simply wanted to mention that this level of service  
17 A through D and level of service E and level of service F,  
18 is really -- it's a measure of how much delay there is to  
19 get through an intersection, how many -- how long you have  
20 to wait to get through and A is good, F is bad and I just  
21 wanted to make sure that was clear.

22 I know everybody on here is clearly not an  
23 engineer and wanted to explain that a little bit, that

1 that's how we measure those intersections function is  
2 the delay that people experience in getting through them.  
3 Thank you.

4 MR. LERNER: Thank you.

5 The graphics on this slide help to further  
6 support the expected reduction of traffic using local  
7 streets to bypass congestion on I-495 as a result of the  
8 495 NEXT Project.

9 As shown in the graphic on the left, our  
10 traffic studies indicate that even without construction  
11 of the Maryland project there would be significant  
12 reductions in traffic volume on local roads, including  
13 Balls Hills Road, Georgetown Pike and Swinks Mill Road  
14 during the peak afternoon travel hour as a result of the  
15 495 NEXT Project.

16 The graphic on the right shows that with the  
17 completion of the Maryland project, which includes  
18 widening of the American Legion Bridge, more traffic would  
19 remain on I-495 rather than using local streets.

20 For example, afternoon traffic on roads west  
21 of the Beltway is reduced. This can be seen most clearly  
22 in the two maps by the change from yellow to green on  
23 Georgetown Pike between Spring Hill Road and Swinks Mill



1 Road.

2 Next slide.

3 The team also evaluated travel time  
4 reliability of 495 general purpose lanes and the 495  
5 Express Lanes prior to and after Maryland's project being  
6 in place.

7 This table shows the travel time comparisons  
8 in the northbound direction between Route 123 and Clara  
9 Barton Parkway. A segment within the project limits  
10 experiences extensive periods of congestion regularly  
11 under existing conditions.

12 Comparisons are shown for both A.M. and P.M.  
13 detail.

14 The first row of numbers from the chart shows  
15 that prior to Maryland's project, the travel time savings  
16 from the northbound 495 Express Lanes are projected to  
17 range from five to 24 minutes, however there would be a  
18 projected increase of four to six minutes in travel time  
19 in the I-495 general purpose lanes prior to the Maryland  
20 project being completed.

21 With Maryland's project in place, shown as the  
22 second and third row of numbers on the chart, travel time  
23 savings ranging from three to eight minutes, are projected

1 for both the I-495 general purpose and I-495 Express  
2 Lanes.

3 This table shows the travel time comparisons  
4 in the southbound direction from Clara Barton Parkway to  
5 Route 123.

6 Prior to Maryland's project the travel time  
7 savings on the southbound express lanes are predicted to  
8 range from one to two minutes and there would be no  
9 difference in travel time for the general purpose lanes.

10 With Maryland's project in place, travel time  
11 savings are projected for both the I-495 general purpose  
12 and 495 Express Lanes ranging from one to eight minutes.

13 The results of a safety analysis performed as  
14 a component of the traffic study indicate that the project  
15 improvements would reduce crashes by 20 percent in 2045.

16 New direct access ramps to the I-495 Express  
17 Lanes at the Dulles Toll Road and at the George Washington  
18 Memorial Parkway would eliminate the need for drivers to  
19 cross four lanes of traffic in order to access the Express  
20 Lane entrances and exits.

21 Additionally, the proposed project includes  
22 design features that would improve safety, including  
23 longer acceleration and deceleration lanes, new auxiliary

1 lanes, and widen and permanent use of shoulders.

2 VDOT is following federal and state policies  
3 for evaluating noise impacts associated with the project.  
4 Sensitive noise receptors were identified along the  
5 corridor, such as churches, recreational areas and outside  
6 residential activity areas and noise measurements were  
7 taken at sample locations.

8 The noise data collected along with terrain  
9 was modeled and noise impacts, including any properties  
10 within the 66 decibel range closer to the highway and the  
11 properties anticipated to experience a noise increase as a  
12 result of the project, were identified. Then noise  
13 mitigation measures or noise barriers were inserted into  
14 the model to determine their effectiveness at reducing  
15 noise.

16 All of this is captured in the preliminary  
17 noise study. The study shows the preliminary locations  
18 where noise walls are warranted and have been determined  
19 to be reasonable and feasible.

20 As the project advances, a final noise  
21 abatement design report will be produced. Owners and  
22 renters of all properties that would benefit from  
23 potential new noise barriers will be identified in the

1 detailed report which will be available on our project  
2 website.

3 The results of our preliminary noise study  
4 indicates that three of the existing noise walls may be  
5 lengthened. Some examples shown in blue lines on these  
6 figures are near the Live Oak Drive overpass and the  
7 George Washington Memorial Parkway interchange.

8 One potential new wall was identified along  
9 Live Oak Drive in the vicinity of the George Washington  
10 Memorial Parkway interchange.

11 Properties along the corridor that are  
12 protected by a noise wall today, will have a noise wall in  
13 the future.

14 Our team has developed a preliminary design of  
15 the proposed improvement. This level of design is more  
16 robust than is typical at this state of a NEPA study and  
17 provides a better understanding of the environmental  
18 impacts and benefits of the project.

19 Preliminary engineering for 495 NEXT includes  
20 the design of highway widening, ramp connections and  
21 interchanges, pedestrian and bicycle facilities, and  
22 replacement of four bridges, as well as drainage and storm  
23 water management ponds.



1           As part of this effort, we have identified  
2 preliminary anticipated impacts to adjacent properties and  
3 necessary changes to limited access lines as well as  
4 developed an overall cost estimate and a project schedule.

5           As part of the 495 NEXT Project, VDOT has  
6 collaborated with the Fairfax County Department of  
7 Transportation and the Fairfax County Park Authority to  
8 include a shared-use path parallel to 495 and connections  
9 across I-495 for bicycles and pedestrians.

10           The proposed shared-used path, which is a key  
11 element of the county-wide trail system, would be located  
12 parallel to I-495 between Lewinsville Road and Live Oak  
13 Drive, reconstructed bridges over I-495 would include  
14 sidewalks and shared-use path to improve bicycle and  
15 pedestrian connections.

16           VDOT is coordinating with the Maryland  
17 Department of Transportation to provide a future extension  
18 connecting the 495 NEXT shared-use path to future bicycle  
19 and pedestrian facilities on the American Legion Bridge  
20 and to points further north.

21           The existing 495 corridor includes four  
22 general purpose lanes in each direction, separated by a  
23 concrete barrier in the middle, with ten to 12 foot

1 shoulders southbound and a six-foot wide right shoulder  
2 and a 13 and a half foot wide left shoulder northbound.

3 The left shoulder on northbound I-495 is  
4 currently used in the peak period as an additional travel  
5 lane. The typical section for the future widening I-495  
6 includes two Express Lanes in each direction, with left  
7 side shoulders, four general purpose lanes in each  
8 direction and wider right side shoulders. Similar to the  
9 existing 495 Express Lanes, the proposed Express Lanes  
10 would be separated from the general purpose lanes with  
11 flexible plus post bollards and a four-foot buffer area.

12 The existing part-time shoulder lane in the  
13 northbound direction would be eliminated and replaced with  
14 a full-time shoulder.

15 The shared-use path, seen here on the left  
16 side of the future typical section, would be located  
17 generally parallel to I-495 behind the noise wall.

18 Proposed connections between the 495 Express  
19 Lanes and Dulles Toll Road interchange would be delivered  
20 in phases, the first focusing on the northbound direction.

21 Phase one would provide direct connections  
22 from the eastbound Dulles Toll Road and the westbound  
23 Dulles Connector Road to the northbound 495 Express Lanes.

1 Express Lane ramps and lanes are shown in  
2 purple and general purpose connections and lanes are shown  
3 in yellow in this graph.

4 Future project phases at the Dulles Toll Road  
5 interchange includes several key connections. These  
6 connections were a part of earlier I-495 studies completed  
7 as part of the original 495 Express Lanes project. They  
8 are already included in the regional long range  
9 transportation plans.

10 Future phrases shown in green and blue are not  
11 currently funded with this project. As plans are  
12 identified, connections shown in green are planned to be  
13 implemented first. These connections include new direct  
14 access from the southbound 495 Express Lanes to the east  
15 bound Dulles Connector Road with connectivity to I-66  
16 inside the Beltway and new connections to and from the  
17 Dulles Airport Access Road or the I-495 general purpose  
18 lanes and the 495 Express Lanes.

19 Connections shown in blue will be implemented  
20 after construction of the connections shown in green by  
21 the design year of 2045. This includes reconfigured ramps  
22 from the I-495 general purpose lanes to the eastbound and  
23 westbound Dulles Toll Road and Connector Road that

1 eliminate the current left side exit.

2 The George Washington Memorial Parkway  
3 interchange, Phase One of the 495 NEXT Project includes  
4 new direct connections to and from the south for the  
5 proposed 495 Express Lanes. The project design allows for  
6 future connections to and from the north from Maryland's  
7 proposed managed lanes.

8 Prior to the opening of the Maryland project,  
9 the 495 project northbound Express Lanes would merge into  
10 the general purpose lanes in the vicinity of the George  
11 Washington Memorial Parkway.

12 In the southbound direction, entrance to the  
13 Express Lanes would begin from a single lane on the left-  
14 side of the general lanes and would then expand to two  
15 lanes similar to the existing I-495 Express Lanes  
16 southbound entrance near Lewinsville Road. The current  
17 Express Lanes entrance near Lewinsville Road would be  
18 eliminated.

19 VDOT has been coordinating with Fairfax County  
20 to assess drainage improvement options within the study  
21 corridor and is considering implementing active and/or  
22 future stream restoration projects similar to the ones  
23 shown on the photo here, as part of the 495 NEXT Project.



1                   Additionally, the 495 NEXT Project includes  
2                   quality and quantity storm water management strategies for  
3                   the overall corridor.

4                   These strategies will also help address runoff  
5                   at Scott's Run.

6                   MS. SHAW: Okay. Thank you, Abi.

7                   I'm going to continue with our presentation  
8                   here in just a moment. So one of the things that we  
9                   wanted to talk about are the number of agency stakeholder  
10                  coordination efforts that we've been going through on this  
11                  project and I would say throughout our project's  
12                  development process we have been coordinating with both  
13                  local partners in Fairfax County as well as our regional  
14                  partners, state agencies as well as federal agencies.

15                  These agencies have participated in regular  
16                  workshops and briefings as well as one-on-one coordination  
17                  meetings.

18                  The 495 NEXT Project is planned to be designed  
19                  and constructed in accordance with all of the required  
20                  agency standards, permit conditions and regulations where  
21                  required by the stakeholder agencies and in just a minute  
22                  we're going to put our slide presentation back up where  
23                  we will be able to see that list, but I'll just read

1 through some of them.

2 So Fairfax County Department of  
3 Transportation, Fairfax County Park Authority, our Federal  
4 Highway Administration, Maryland Department of  
5 Transportation. We've also worked with our Metropolitan  
6 Washington Airports Authority, our Council of Governments,  
7 the National Park Service, Northern Virginia  
8 Transportation Authority and here you see the list here.

9 So with that, I'll move to the next slide to  
10 talk about our project delivery partnership.

11 In January of 2019, Capital Beltway Express,  
12 which is a subsidiary of Transurban, they're the current  
13 operator of the 495 Express Lanes, and in January of 2019  
14 VDOT and Transurban entered into a draft framework  
15 agreement to work towards amending the current  
16 comprehensive agreement to extend the existing 495 Express  
17 Lanes.

18 Under the draft agreement, Transurban, in  
19 close coordination with VDOT, is developing preliminary  
20 design plans to support the environmental analysis as well  
21 as additional independent studies to support the project's  
22 design. VDOT reviews and approves this work as it is  
23 developed.

1           After the required environmental regulatory  
2           approvals for the 495 NEXT Project are received,  
3           Transurban would then submit a binding proposal to VDOT to  
4           finalize the design and to construct the project with no  
5           public funding from the Commonwealth.

6           Transurban would then operate and maintain the  
7           495 Express Lanes Extension, just as they operate and  
8           maintain the existing system out there today.

9           VDOT will continue to be responsible for  
10          regulatory approvals for project oversight and for agency  
11          coordination.

12          On the next slide you see a chart with our key  
13          milestones on the top and then kind of a bar depiction of  
14          those on the bottom from end to end.

15          The public hearing is an important milestone  
16          in the project schedule. As part of the public hearing  
17          process, VDOT is seeking public input on the 495 NEXT  
18          Project's design and Environmental Assessment.

19          Once the formal public comment period closes  
20          on October 23rd, VDOT and Federal Highway Administration  
21          will review and respond to comments from the public and  
22          agencies.

23          Once the comments and responses are complete,

1 the Federal Highway Administration would then consider  
2 their decision on the project's final outcome of the  
3 Environmental Assessment. This decision is expected in  
4 early 2021.

5 VDOT will then work with Transurban to execute  
6 a formal contract for building and delivering the project.  
7 Should all of those approvals fall into place as we are  
8 showing, VDOT anticipates that construction of 495 NEXT  
9 Project, both final design and construction would start in  
10 late 2021 with the 495 Express Lanes open to traffic by  
11 the end of 2024.

12 In addition, Abi mentioned and we've had kind  
13 of this theme throughout the project, we are -- through  
14 our presentation tonight, VDOT's project is being  
15 developed as a stand alone project that will tie into  
16 future improvements at the American Legion Bridge.

17 VDOT is continuing to coordinate with Maryland  
18 to ensure that the two operationally independent projects  
19 are compatible and to optimize capacity improvements at  
20 the American Legion Bridge.

21 The Capital Beltway Accord, as announced by  
22 Virginia's Governor Northam and Maryland's Governor Hogan  
23 in November of 2019, is an agreement between Virginia and



1 Maryland that provides a path forward to funding and  
2 implementing improvements between the GW Memorial Parkway  
3 in Virginia and River Road in Maryland.

4 This graphic shows a potential configuration  
5 of the George Washington Memorial Parkway with new  
6 interchange ramps connecting proposed managed lanes on the  
7 American Legion Bridge and the Parkway. Maryland and  
8 Virginia are continuing to work together to refine this  
9 preliminary design concept.

10 Another study that's being done outside of our  
11 project is a regional transit study. This new regional  
12 transit study is underway to assess transit needs along  
13 the I-495 Corridor in Virginia and Maryland. It's being  
14 performed jointly by the Virginia Department of Rail and  
15 Public Transportation and the Maryland Transit  
16 Administration and is being conducted in parallel to the  
17 current studies and design efforts that are underway as  
18 part of our project for 495 NEXT. Results of this transit  
19 study are anticipated later in 2020.

20 And with that, we've concluded our  
21 presentation and I'm going to turn the mic back over to  
22 Michelle.

23 MS. HOLLAND: Thank you, Susan and Abi.

1           Now we are going to begin the public comment  
2 portion of our hearing. I wanted to go over a few  
3 important announcements before we kick that off.

4           First off, all the comments received tonight  
5 will be included in the project's public record.

6           Speakers are limited to three minutes if  
7 you're speaking as an individual and five minutes if  
8 you're speaking for a group.

9           A reminder that all attendees should remain  
10 muted until it is your turn to provide your comment and  
11 that's to minimize background noise.

12           We are going to begin with preregistered  
13 speakers and I will call your name down the list and when  
14 I do so, I will ask you to unmute yourself so that you can  
15 state your comment.

16           Following the preregistered speakers we will  
17 open it up to others who want to provide formal comments  
18 and if time allows, we will open it up to questions and  
19 answers.

20           Next slide.

21           Once we've gone through our list of  
22 preregistered speakers and we open up the comment to  
23 others, you can provide your comments using the chat

1 feature on WebEx. If you're using the chat function, once  
2 it's turned on, we ask that you write in your name stating  
3 that you would like to provide your comment and then once  
4 we get to your name, we'll call on you and ask you to  
5 unmute yourself.

6 We will be turning the chat function on and  
7 off at intervals during this time so that we can be sure  
8 to keep up with the comments and keep the process  
9 manageable.

10 One thing to note is when the chat function  
11 is on, all participants will be able to see all messages.  
12 We ask that you only write in your formal comments. The  
13 chat function should not be used for any type of  
14 commentary or discussion during the hearing.

15 Next slide.

16 If you joined us this evening by phone and you  
17 want to provide your comment, you would need to press star  
18 3 to raise your hand and to be added to the queue to state  
19 your comment.

20 We will announce when it is your turn to say  
21 your comment and we will unmute your phone line. You will  
22 hear your line has been unmuted, after which you will be  
23 able to state your comment.

1           Once you have spoken, please press star 3  
2           again to lower your hand. You will be muted again at this  
3           time to avoid echo and feedback due to the number of  
4           participants.

5           Before we get started with our comment period,  
6           I did want to recognize two other people that joined us  
7           this evening, Senator Favola, thank you for joining us  
8           this evening, and Tom --

9           SENATOR FAVOLA: (Unintelligible)

10          MS. HOLLAND: Thank you, Senator. And I  
11          believe Tom Biesiadny has also joined us this evening.  
12          Tom is the Director of Transportation for Fairfax County.

13          MR. BIESIADNY: Thank you, Michelle.

14          MS. HOLLAND: Okay. I'm going to go ahead and  
15          start down the list. As I mentioned you have three  
16          minutes if you're speaking as an individual and five if  
17          you're representing a group.

18          I'll give you a warning when we're about 30  
19          seconds prior to your time running out.

20          When I do call on your name, I'm going to ask  
21          you to unmute yourself and I would ask that you please  
22          repeat your name slowly and clearly so that we can make  
23          sure that it is transcribed correctly.



1           The first person this evening to share their  
2 comment is Morgan Butler. If you could go ahead and  
3 unmute yourself.

4           MR. BUTLER: Good evening. My name is Morgan  
5 Butler and I am speaking for the Southern Environmental  
6 Law Center tonight where I'm a senior attorney. The  
7 Southern Environmental Law Center works throughout  
8 Virginia to promote transportation and land use decisions  
9 that strengthen communities, protect our natural resources  
10 and improve our quality of life.

11           Thank you for this chance to comment on the  
12 Environmental Assessment. We submitted written comments  
13 on the document back in May and wanted to take this  
14 opportunity to flag some of our main questions and  
15 concerns.

16           Our first point tonight is one that we first  
17 raised in the NEPA scoping letter we submitted over two  
18 years ago and that is the need for the Environmental  
19 Assessment to evaluate more than just a single build  
20 alternative.

21           NEPA requires that a range of reasonable  
22 alternatives be considered. Data in the traffic analysis  
23 conducted for this project suggests that alternatives

1 that include only one or even no southbound Express  
2 Lanes along a portion of the corridor could reasonably  
3 meet many of the project's goals.

4 Taking a hard look at some scaled back  
5 alternatives is even more important now in light of the  
6 travel changes that the COVID-19 pandemic has brought  
7 about, some of which could result in less peak period  
8 driving in the region over the long term.

9 Our second point is another one we have raised  
10 repeatedly, this project should include significant  
11 funding for improving and expanding transit in the area.

12 Yes, transit vehicles would be able to travel  
13 in the Express Lanes, but Virginia must do much more to  
14 advance transit with this project, both to help counter  
15 it's potential to increase vehicle miles traveled and to  
16 address some of the equity concerns it raises regarding  
17 access to the Express Lanes.

18 In short, we repeat our request that as part  
19 of this project Virginia include substantial financial  
20 support for establishing express bus service along I-495  
21 and for providing connections between key population  
22 centers in the corridor.

23 Third, we remain skeptical of the

1 Environmental Assessment's conclusions that this project  
2 would reduce vehicle miles traveled and by extension  
3 greenhouse gas emissions when compared to the no-build  
4 alternative.

5 Increasing highway capacity routinely results  
6 in increases in vehicle miles traveled because that  
7 additional capacity induces more driving and it's far from  
8 clear why this project would be any different.

9 We therefore ask you to point to the modeling  
10 data and to provide additional explanation to support the  
11 conclusions that this project would reduce vehicle miles  
12 traveled and greenhouse gas emissions.

13 Finally, we wish just to reemphasize for  
14 decision makers some important findings from a portion of  
15 the traffic study that was commented on tonight that  
16 looked at what happens if this project is built without  
17 managed lanes going in on Maryland's side of the Beltway.

18 It found that the resulting bottleneck at the  
19 American Legion Bridge would actually make peak period  
20 travel times on the general purpose lanes worse in both  
21 directions and considerably so in the northbound  
22 direction.

23 In light of the serious challenges facing

1 the Maryland managed lanes project, Virginia's decision  
2 makers need to make certain that we don't prematurely  
3 commit to building Express Lanes that could make things  
4 worse for people who can't afford to use them.

5 Thank you again for this chance to provide  
6 comment.

7 MS. HOLLAND: Thank you, Morgan.

8 Okay. Up next are Craig and Susan Tenney. If  
9 you would go ahead and unmute yourself and please repeat  
10 your name.

11 (No response)

12 Craig and Susan Tenney.

13 (No response)

14 Okay. We will come back to the Tenneys.

15 Are you there? Okay. I'm going to (audio cut  
16 off)

17 MALE VOICE: Okay, Michelle is having a little  
18 technical issue here. The next speaker up on our list is  
19 Andrew Churchill, followed by Patrick Lynch.

20 Andrew Churchill, if you could go ahead and  
21 unmute yourself, please.

22 (No response)

23 You'll hear Andrew Churchill and Patrick



1 Lynch as our next two.

2 FEMALE VOICE: Perhaps you should repeat how  
3 to unmute yourself if you are using a phone.

4 FEMALE VOICE: To unmute yourself --

5 FEMALE VOICE: (Unintelligible)

6 FEMALE VOICE: -- hit star 3 if you're using  
7 the phone.

8 FEMALE VOICE: Our instructions were to use  
9 star 6.

10 MS. HOLLAND: Yes. Hi, this is Michelle. Is  
11 that the Tenneys?

12 MALE VOICE: (Unintelligible)

13 MS. HOLLAND: Okay. Karen, this is Michelle,  
14 can you hear me, testing.

15 FEMALE VOICE: I can hear you well, thank you.

16 MS. HOLLAND: Okay. Andrew Churchill.

17 (No response)

18 MS. HOLLAND: Do we have anyone on the phone?  
19 Andrew Churchill.

20 (No response)

21 MS. HOLLAND: Patrick Lynch.

22 MALE VOICE: Hello.

23 MS. HOLLAND: Patrick Lynch?

1 (No response)

2 MS. HOLLAND: Okay, Steven Swift?

3 (No response)

4 MS. HOLLAND: Alice Zhou, Z-H-O-U? Alice?

5 (No response)

6 MS. HOLLAND: Jeffrey Parnes?

7 (No response)

8 MS. HOLLAND: Jeffrey Parnes?

9 (No response)

10 MS. HOLLAND: Okay, Mickey Chopra, C-H-O-P-R-  
11 A.

12 MS. CHOPRA: Hi, this is Mickey Chopra.

13 MS. HOLLAND: Okay, Mickey. Go ahead with  
14 your comment, please.

15 MS. CHOPRA: Thank you. I appreciate all the  
16 work that's been done on this, however as a citizen and a  
17 tax payer we haven't heard any details since May of last  
18 year and it seems like things are moving forward very  
19 quickly at this point but in the days of COVID and this  
20 transition to everything online, as can see in this  
21 meeting there's a lot of, you know, technical difficulties  
22 and I think that, you know, the citizens and tax payers  
23 really need more time to understand in detail all the

1 facts that are going to happen to their properties and  
2 their homes.

3 We're going to be affected greatly, our  
4 properties and our homes. We already are affected greatly  
5 by the noise and the air pollution. I mean we just have  
6 to walk outside and we can hear all the noise from 495  
7 and I really, you know, wish that there was no traffic,  
8 but you know, if I had to choose between dealing with  
9 traffic versus, you know, impacting so many people's homes  
10 and properties, um I would pick just a little bit more  
11 traffic but we're also, you know, in these days we're --  
12 our work has changed. Our jobs have changed. More people  
13 are online now and that should be considered too and the  
14 impact of being online and remote work versus, you know,  
15 the way things were and we are amongst the highest tax  
16 payers in the state and I just really feel like it seems  
17 like, you know, we are -- there is, you know, sorry for  
18 being dramatic here, but like a bomb is being dropped on  
19 us and I mean it is really going to impact our  
20 neighborhoods and I think more citizens need to have the  
21 opportunity to comment.

22 MS. HOLLAND: Okay. Thank you, thank you,  
23 Mickey, we appreciate that.

1 MS. CHOPRA: Sure, thank you.

2 MS. HOLLAND: Okay. I want to go over a quick  
3 refresher in case anyone is having issues.

4 If I call your name and you are online with  
5 us, please go ahead and unmute yourself so you can state  
6 your comment and you should see the mute button at the  
7 bottom of your screen, you just click on it to unmute  
8 yourself when you're talking.

9 If you joined by phone and it's your turn, you  
10 need to press star 3 to raise your hand and then we will  
11 be able to see your number and we will unmute your phone  
12 line. You'll hear over the phone that your phone line has  
13 been unmuted so that you can say your comment and then  
14 you'll press star 3 again to lower your hand.

15 If you're having technical difficulty, please  
16 call 703-691-6715. We have someone standing by that will  
17 take your call and let us know your name and the best way  
18 to get in touch with you.

19 Okay. We're going to continue on with our  
20 comments and I'm going to call on David Wuehrmann, W-U-E-  
21 H-R-M-A-N-N.

22 MR. WUEHRMANN: Thank you very much, Michelle.  
23 I'm David Wuehrmann and thank you for the opportunity to



1 speak tonight.

2 I'm David Wuehrmann and I'm chair of the  
3 McLean Citizens Association Transportation Committee. I'm  
4 speaking today on behalf of the MCA.

5 The MCA and particularly the Transportation  
6 Committee, has been following this initiative since it was  
7 first proposed and two committees, the Transportation  
8 Committee and the Environment, Parks and Recreation  
9 Committee began considering the environmental documents  
10 since they were issues last February.

11 These efforts culminated in our resolution  
12 that was passed by the MCA Board on a 25 to 7 vote with  
13 one abstention, at the board's September 2nd meeting.  
14 That resolution has already been submitted to VDOT for the  
15 record and it represents the position of the MCA in this  
16 matter. I don't intend to elaborate on that resolution,  
17 but mainly to summarize it for this public hearing.

18 The resolution supports 495 NEXT largely for  
19 the reason that the MCA has long been concerned about  
20 traffic back-ups on the Beltway leading to the American  
21 Legion Bridge, especially as they have caused cut-through  
22 traffic and congestion in McLean neighborhoods as  
23 motorists have tried to access the Beltway and Georgetown

1 Pike to avoid Beltway congestion.

2 The MCA has also long understood that no long  
3 term solution to this problem is likely until the American  
4 Legion Bridge is rebuilt to increase capacity. Over the  
5 last several years the MCA has made numerous attempts to  
6 call attention to this problem, including in previous  
7 resolutions (Unintelligible - audio breaking up) 2011 and  
8 2016.

9 While we are aware that 495 NEXT does not  
10 address reconstruction or additional capacity at the  
11 American Legion Bridge as such, any such improvements of  
12 the American Legion Bridge, such as is contemplated in  
13 Maryland's managed lane study, would be of limited value  
14 as the adjacent portions of I-495 were not similarly  
15 improved.

16 I-495 as far north as the Dulles Toll Road now  
17 contains HOT lanes and Maryland's proposal for the  
18 American Legion Bridge and adjacent Maryland portions of  
19 I-495 would also include managed toll lanes.

20 Failure to improve the approximately three-  
21 mile section of I-495 at issue here would leave a gap  
22 between the other sections of I-495 that have been or will  
23 have been expanded causing a choke point that would leave

1 the overall situation unimproved.

2 This is the primary basis for the MCA's  
3 support of 495 NEXT, although we recognize that VDOT has  
4 identified other benefits that would occur even before  
5 Maryland acts on its own proposal.

6 The relevant MCA committee spent considerable  
7 time analyzing the environmental consequences of this  
8 proposed action as is reflected in the resolution.

9 The MCA's support is conditioned on VDOT  
10 addressing a number of environmental issues and taking  
11 appropriate measures, including providing residents with  
12 advance notice of construction activities that could  
13 impact public and private property, mitigating the loss of  
14 118 acres of trees through a tree survey and implementing  
15 and monitoring a replanting program, minimizing the  
16 project's footprint on Scott's Run Nature Preserve and the  
17 GW Parkway, undertaking a resource inventory along the  
18 Potomac Heritage Trail using already paved areas for  
19 temporary construction easements, using native species in  
20 mitigation, providing the public with a landscaping plan  
21 and the opportunity to comment on that plan, conducting  
22 surveys of the natural resources and diverse ecology  
23 within the Scott's Run Nature Preserve, making a cash

1 contribution to the Fairfax County Parks Authority for  
2 removal of invasive plants in the preserve and adopting  
3 and implementing a comprehensive storm water management  
4 plan.

5 We intend to remain in contact with VDOT to  
6 monitor these measures are being implemented.

7 In considering all of this, the MCA has been  
8 aware that we are in unusual times because of the  
9 Coronavirus. The resolution urges VDOT to consider  
10 carefully the financial impacts and uncertainties related  
11 to increased use of telework and reduced commuting traffic  
12 patterns resulting from the pandemic prior to signing a  
13 contract for the project or beginning any construction  
14 related activities.

15 That concludes my comments. Thank you again  
16 for the opportunity to speak.

17 MS. HOLLAND: Thank you, David.

18 Okay. I'm going to just state the names of  
19 our next three speakers so that you can prepare. We're  
20 going to call us Jason Stanford, followed by Douglas  
21 Stewart and then Merrily Pierce.

22 Jason Stanford, you are next, if you could go  
23 ahead and unmute yourself.



1 MR. STANFORD: Sure. Can you hear me?

2 MS. HOLLAND: Yes.

3 MR. STANFORD: Great. Thank you for the  
4 opportunity to comment today. My name is Jason Stanford  
5 and I am the president of the Northern Virginia  
6 Transportation Alliance. For more than 30 years the  
7 Alliance has been the visionary leader for regional  
8 transportation solutions in Northern Virginia that improve  
9 our economic prosperity and quality of life.

10 Backed by regional thought leaders, we are  
11 focused on building a 21st century transportation network  
12 in Northern Virginia and the Greater Washington region.

13 On behalf of the Alliance's members and board  
14 of directors, I'm here today to express our strong support  
15 for the I-495 NEXT project.

16 This project is critical to Northern  
17 Virginia's transportation future. In addition to  
18 expanding travel capacity, creating new travel options and  
19 relieving congestion at one of the areas worst  
20 bottlenecks, it's an essential component of an integrated  
21 Express Lanes network, one of the area's top long range  
22 transportation priorities.

23 The Transportation Planning Board, the

1 planner for our region, did a performance analysis of  
2 the regional Express Lanes Network and concluded that  
3 congestion managed lanes provide the greatest increase in  
4 regional transportation network reliability.

5 The TPB then endorsed inclusion of the Express  
6 Lanes Network in the region's long range transportation  
7 planning, visualized 2045.

8 Furthermore, Virginia and Maryland have  
9 recently made great strides in regional collaboration,  
10 including the Capital Beltway Accord, which was announced  
11 last year and will ultimately work to fix and expand the  
12 American Legion Bridge.

13 This is one of the region's worst bottlenecks  
14 and the 495 NEXT project is a critical first step to  
15 addressing it. Although some might try to sow seeds of  
16 doubt about the reliability of Maryland to hold up its end  
17 of the bargain, I believe that these concerns are  
18 unfounded.

19 In fact, political leaders on both sides of  
20 the river have agreed that fixing the American Legion  
21 Bridge is a top priority and Montgomery County's own  
22 alternative plan to the 495-270 managed lanes study  
23 includes expansion of the American Legion Bridge. The

1 fact of the matter is that expanding the region's Hot  
2 Lanes network helps all modes of transportation in the 495  
3 corridor.

4 In addition to dramatically reducing  
5 congestion and delays for both managed lanes and general  
6 purposes lane users, HOT Lanes incentivize more carpooling  
7 and transit ridership by dramatically increasing the  
8 reliability of both modes for free.

9 To maximize this advantage, VDOT and MDOT are  
10 already studying bus rapid transit improvements using  
11 these new lanes.

12 Additionally, the project's three mile  
13 shared-used path will connect to local trails and greatly  
14 enhance bicycle and pedestrian travel.

15 At a time when our region is struggling to  
16 cope with the economic consequences of the COVID-19  
17 pandemic, this 100 percent-privately funded project will  
18 create thousands of new jobs and inject hundreds of  
19 millions of dollars into our economy.

20 Now is the time to move forward with this  
21 regionally significant project that will benefit our  
22 transportation network, economy and community for many  
23 years to come. Thank you.

1 MS. HOLLAND: Thank you, Jason.

2 Next up is Douglas Stewart.

3 MR. STEWART: Good evening. My name is  
4 Douglas Stewart. I'm speaking tonight for the Virginia  
5 Sierra Club.

6 We believe there are better alternatives that  
7 have not been assessed that will increase travel choices,  
8 more effectively relieve congestion and reduce  
9 environmental impacts and greenhouse gas emissions.

10 This project that's proposed is a continuation  
11 of one of the first public-private partnerships on the  
12 southern segment of 495 and we've learned a lot since then  
13 and Virginia has learned a lot from its experiences with  
14 public-private partnerships and negotiated some pretty  
15 effective deals on 66, 395 that include funding for  
16 transit and this proposed project has no funding for  
17 enhanced transit. It doesn't increase travel choices,  
18 it's oriented toward single occupancy vehicle travel and  
19 it's not a good deal for the state.

20 Any agreement with a concessionaire must  
21 include funds for enhanced transit. It should also  
22 include reservation of right-of-way for dedicated bus or  
23 trail transit which is called for in Fairfax County's



1 Comprehensive Plan for Tysons.

2 We're talking here about a 50 to 75 year  
3 concession that will give up that right-of-way and give  
4 up prospects for enhanced transit while Fairfax's own  
5 comprehensive plan for Tysons called for dedicated transit  
6 to Maryland by the full build of Tysons which is supposed  
7 to happen around 2050.

8 We're giving away our future for a private  
9 project that's not going to provide travel benefits and  
10 it's going to increase greenhouse gas emissions by  
11 increasing vehicle miles traveled.

12 We're disappointed that other alternatives  
13 weren't studied and we think that it's imprudent to go  
14 forward with a project that's adding more than 80 feet to  
15 the right-of way, that's going to impact over 100 acres  
16 of forests, almost three miles of streams without clear  
17 mitigation plans from the concessionaire for those  
18 impacts, impacts that could be minimized by taking less  
19 right-of-way and by having dedicated plans for good  
20 transit that's going to get to Maryland.

21 These are contrary to what Fairfax County's  
22 policy initiative are calling for in the community-wide  
23 Climate and Energy Action Plan, which calls for reducing

1 greenhouse gas emissions.

2 The analysis saying that this will reduce  
3 vehicle miles traveled in the Environmental Assessment as  
4 a previous speaker observed is highly suspect and contrary  
5 to both lived experience and the scientific scholarship  
6 about induced demand and that adding travel lanes on  
7 highways increased vehicle miles traveled.

8 This is not -- this is bending the curve  
9 upward in greenhouse gas emissions. It's also contrary to  
10 Fairfax's plans to reduce greenhouse gas emissions and  
11 it's also contrary to Fairfax's focus in One Fairfax on  
12 more equitable access to economic opportunities both for  
13 residents and commuters.

14 Commuters coming to Tysons who are powering  
15 Tyson's economy are not going to be able to get to Tysons  
16 more easily through these added capacity for single  
17 occupancy vehicles. We need transit to be part of the  
18 solution and this project fails to provide it. It also  
19 fails to evaluate how travel patterns have changed in the  
20 wake of COVID-19 and those are likely to be long term  
21 changes.

22 Therefore, we urge that you reexamine the  
23 project, go back to the drawing board and look at other

1 alternatives. Thank you.

2 MS. HOLLAND: Thank you.

3 Okay. The next speaker is Merrily Pierce,  
4 followed by Susan Bonney and then Glenn Youngkin.

5 Merrily, go ahead.

6 MS. PIERCE: Yeah, good evening. I want to  
7 thank VDOT staff for the impressive amount of work that  
8 went into the Environmental Assessment. I read all 407  
9 pages and I appreciate the opportunity to address you this  
10 evening.

11 Three minutes are very brief, so I'll be  
12 submitting detailed comments to VDOT in writing in the  
13 allowed comment period.

14 We need solutions for the congested Beltway  
15 corridor from Route 267 to the American Legion Bridge, but  
16 that said I am opposing the I-495 NEXT Project and the  
17 continuation of the 2005 contract with the private partner  
18 for the following reasons.

19 The first is the privatization of our public  
20 roads is fundamentally wrong for the Commonwealth period.  
21 The public uses our roads and the public has traditionally  
22 paid for those roads.

23 The P3 tolling model used by private partners

1 for revenue to repay bond debt seems to be flawed and  
2 there are other reasons.

3 The second, VDOT and the private partner need  
4 to be more transparent with the P3 financial agreements.  
5 The 2020 EA makes note of the process to balance the P3  
6 project with the publicly funded one before it is approved  
7 and then does not provide access to that important report.

8 A week ago - third reason, a week ago the  
9 Maryland General Assembly members urged MDOT to reject the  
10 P3 agreement for the Maryland 495-I-270 Express Lane  
11 project. Without the Maryland component, the I-495 NEXT  
12 project will not work as a continuing or a stand alone  
13 project and we will need other alternatives and new  
14 numbers.

15 Fourth, as part of the public presentation in  
16 2003 by one of the prospective private partners for the  
17 I-495 HOT Lanes, one of the promises made was, and I quote  
18 "HOT Lanes do not preclude rail transit in the Beltway  
19 corridor. The project is compatible with future transit  
20 alternatives, including rail and BRT."

21 VDOT has only one build alternative despite  
22 EPA criticism asking for a robust explanation. The  
23 Capital Beltway Corridor Feasibility Study was initiated



1 in 2000, twenty years ago, and I have a copy of that  
2 study, when VDOT was considering widening the Beltway and  
3 the alignments were analyzed for heavy rail, light rail,  
4 monorail and BRT.

5 There was strong support for rail on the  
6 Beltway at the time. The proposed rail alignments were  
7 rejected because of right-of-way and other issues in favor  
8 of the HOT Lanes proposal. Fairfax County, the state and  
9 federal government have invested \$10 billion in the Silver  
10 Line through Tysons and through Dulles Airport and beyond.  
11 A replacement for the Woodrow Wilson Bridge was completed  
12 in 2009 at a cost of 2.3 billion with lanes reserved for  
13 future rail transit. Maryland representatives support  
14 consideration of the rail alignment on the American Legion  
15 Bridge and cite the reserved space on the Wilson Bridge.

16 VDOT needs to provide rail alignment as a  
17 build alternative to the public to evaluate as part of  
18 this project today because circumstances have changed in  
19 the last 20 years. Rail connecting Maryland with Tysons  
20 Corner and the Silver Line could move more commuters  
21 efficiently in the future adding to the value of  
22 infrastructure in which significantly investments have  
23 already been made.

1                   Thanks very much for the opportunity to  
2                   comment.

3                   MS. HOLLAND: Thank you, Merrily.

4                   Okay. Our next commenter is Susan Bonney who  
5                   I believe has joined us by phone. So Susan we're going to  
6                   go ahead and unmute you.

7                   MS. BONNEY: Okay, I'm ready.

8                   MS. HOLLAND: Go ahead. Thank you.

9                   MS. BONNEY: Thank you for this opportunity.  
10                  Can you confirm that you can hear me?

11                  MS. HOLLAND: Yes, Susan, we can hear you.  
12                  Please repeat your name.

13                  MS. BONNEY: My name is Susan Bonney, B-O-N-N-  
14                  E-Y, and thank you for this opportunity. I appreciate  
15                  that my senator, Barbara Favola, and my county supervisor,  
16                  John Foust, are attending and listening.

17                  Because I'm a local resident near the 495  
18                  interchange at Churchill Road, I understand and experience  
19                  the congestion issues, but I do not understand how this  
20                  could be the best solution.

21                  This proposed project is adding more than 80  
22                  feet of roadway but it's roadway that will be used mainly  
23                  by single occupancy vehicles and the project will also

1 remove more than 100 acres of forest and trees and  
2 directly affect Scott's Run which this neighborhood has  
3 worked years and emphasized the importance of Scott's Run  
4 and protected it from this type of project.

5 This project does not provide an improved  
6 transit solution and it's not going to solve our traffic  
7 problems.

8 You presented that one of the project goals  
9 was to add new travel choices, but without addressing  
10 adding transit in this project, it's not going -- this  
11 project's not going to increase -- it's going to increase  
12 pollution and greenhouse gases emissions and it's not  
13 going to make it any easier for people who can't afford  
14 the high cost of owning a car and want to work in Tysons  
15 Corner and nearby areas in order to get there.

16 That concludes my comment. Thank you.

17 MS. HOLLAND: Okay. Thank you, Susan.

18 Before we go to the next speaker, we were just  
19 asked the question of how -- somebody asked how do I  
20 submit my comment through the chat function.

21 We're using the chat function this evening to  
22 let us know that you'd like to make a comment. So if you  
23 didn't sign up in advance you can type in your name and

1 that you'd like to make your comment.

2 We have other ways that are in place where you  
3 can submit a written comment that will be reviewed and  
4 added to the public record and I'll go over those methods  
5 with you before we conclude this evening.

6 Okay. Our next three speakers are Glenn  
7 Youngkin, followed by Clayton Medford and Paige Przylek.

8 I'm going to call on Glenn Youngkin first  
9 please. Glenn Youngkin.

10 MR. YOUNGKIN: All right, thank you, Michelle.  
11 Can you hear me okay?

12 MS. HOLLAND: Yes.

13 MR. YOUNGKIN: Great. Thank you for giving me  
14 the opportunity to speak to you. My name is Glenn  
15 Youngkin and I'm a manager at the Trinity Group, LLC which  
16 owns the property located at 850 Balls Hill Road in  
17 McLean. Most people will know that it's right at the  
18 corner of Georgetown Pike and 495.

19 We are thinking about renaming our property  
20 the 495 Express Lanes Northern Extension Island as we are  
21 going to be impacted on 100 percent of our perimeter  
22 between movements of sound barriers, replacements of  
23 bridges and the establishment of new regional trails.



1 I would ask that the design committee  
2 reevaluate first the zigzagging of the regional trail from  
3 the westside of 495, moving it to the east side of 495  
4 simply to accommodate spacing along the westside corridor  
5 and yet actually have to take from us incremental property  
6 along Balls Hill Road in order to make the seven to 12-  
7 foot wide trail as called for.

8 Second of all, when a piece of property like  
9 850 Balls Hill Road, which is the home to Holy Trinity  
10 Church, is impacted in this way, I do hope that everyone  
11 recognizes the substantial interruption of operations,  
12 the substantial incremental costs that we're going to  
13 incur associated with going back and relegislating an  
14 existing zoning accord that allows us to operate, along  
15 with the parking lot reduction that demands certain  
16 operating and shielding and on top of that the substantial  
17 diminution of value that our property will experience.

18 While I'm very much supportive of the overall  
19 project in order to address the tremendous traffic  
20 challenges at this particular 495 interchange at  
21 Georgetown Pike, what's happening to 850 Balls Hill Road  
22 as a result of really pouring the entire project in the  
23 perimeter of our property does seem a bit unfair and so I

1 would ask the design team to please take one more look at  
2 what you're doing to our church property in advance of  
3 finalizing any plans. Thank you.

4 MS. HOLLAND: Okay. Thank you.

5 Next up is Clayton Medford.

6 MR. MEDFORD: Hi, I'm Clayton Medford, vice  
7 president of Government Relations at the Northern Virginia  
8 Chamber of Commerce. We represent 700 members with over  
9 500,000 employees in the region and we are strongly in  
10 support of the 495 NEXT Project.

11 We're committed to ensuring that our region  
12 remains the best place to start and grow a business and  
13 key to that and in order to maintain our position as a top  
14 destination we must continue to invest in developing a  
15 21st century transportation network aimed at improving our  
16 mobility.

17 That 21st century transportation network  
18 requires both public sector investments, as well as  
19 leveraging private sector investment in innovation.  
20 That's why we strongly support this project. Just as  
21 important as the economic activity this project will  
22 generate directly, it will reduce congestion in the region  
23 and provide new travel choices that will help make Tysons

1 and McLean area more attractive to new businesses and  
2 help the existing businesses flourish.

3 495 NEXT, as you've heard tonight, is also a  
4 critical step to getting the American Legion Bridge  
5 project completed. That bridge project is the most  
6 critical transportation project in the region and  
7 unlocking the economic potential is what would be lead to  
8 with the bridge project and 495 NEXT.

9 And finally, I understand the concern that has  
10 been raised some tonight that the COVID related reduction  
11 in traffic means this project and others like it can wait.  
12 We strongly disagree with this assertion.

13 First, we've seen traffic and transit use  
14 increase as restrictions were lifted earlier this summer.  
15 Second, it is true we do not know exactly what the impact  
16 of teleworking will be during COVID or after COVID,  
17 however it's the same uncertainty that we faced since  
18 March. There has been no study or survey conducted that  
19 shows any significant permanence of the widespread  
20 adoption of teleworking and staggered arrivals and  
21 departures that are happening now.

22 Third, our area will continue to grow as the  
23 economic recovery continues, particularly when you

1 consider the jobs stability provided by our proximity  
2 to the federal government, high quality infrastructure and  
3 in particular broadband and world class public K-12 and  
4 higher education institutions.

5 Finally, as you all know, waiting only makes  
6 this project more expensive and more necessary. We don't  
7 want to be here in 2024 wishing we had started a project  
8 now. Now's the time for 495 NEXT. Thank you.

9 MS. HOLLAND: Thank you, Clayton.

10 Okay. I'm now going to call on the next  
11 three speakers in the order in which we'll hear from them,  
12 Paige Przylek will be next, P-R-Z-Y-L-E-K, followed by  
13 Debra Butler, followed by April Geogeles.

14 Paige, go ahead.

15 MALE VOICE: (Unintelligible)

16 MS. HOLLAND: Okay. We'll come back.

17 Debra Butler, if you'd like to go ahead and  
18 unmute yourself.

19 (No response)

20 MS. HOLLAND: Debra Butler, she may have  
21 joined by phone. Can we --

22 MS. BUTLER: Hello?

23 MS. HOLLAND: Okay. Debra?



1 MS. BUTLER: Yes. Thank you for -- thank you  
2 for unmuting me. (Technical interference)

3 MS. HOLLAND: Okay.

4 MS. BUTLER: (Technical interference) Debra  
5 Butler and I am the founder of 495 Matters and it is a  
6 group of approximately 285 citizens here in McLean  
7 recently formed and getting great momentum and we are  
8 extremely disturbed about this project proceeding.

9 There is several reasons why we are and we  
10 will submit all of these formally in a position paper to  
11 Secretary Valentine as well as I would also like to take a  
12 moment to call out Barbara Favola, Representative Kathleen  
13 Murphy, Senator Barbara Favola, for their really earnest  
14 work over the last week in hearing our pleas and listening  
15 to us. So we thank you very much for that and sorry for  
16 email bombing your inboxes.

17 But aside from that, this is really a great  
18 problem for the area. First of all, in light of the  
19 Maryland General Assembly and how they have banded  
20 together, 69 of them have come and written this sharp  
21 rebuke and calling out Virginia and its lack of  
22 transparency with regard to what's happening on the bridge  
23 and the rail. We have sat at many VDOT meetings where

1 VDOT has said - I have been on the MCA Transportation  
2 Board, I have been on the MCA Environmental Board - we  
3 have sat at many meetings where VDOT has said that they  
4 are proceeding ahead to force Maryland.

5 So it's like trying to take a state hostage.  
6 We have to ensure that we do not build before Maryland.  
7 They are working it out and we should wait to work it out.  
8 The project going forward has severe issues.

9 Number one, the P3, the original P3 on this  
10 was sent and this project was actually designated not  
11 appropriate for a P3 partnership. The Commonwealth of  
12 Virginia found that the citizens of Virginia would be  
13 better served if this was a project that was handled by  
14 the state of Virginia.

15 Trying to solicit documents that show an  
16 update to that to say why it is now better to do it as a  
17 P3 have been buried. This is a significant problem,  
18 particularly in light of COVID and the downgrade of  
19 Transurban's debt ratings.

20 There have been people who have come forth who  
21 have indicated that part of this is about kicking the  
22 financial debt of certain parts of VDOT, getting ahead of  
23 their skis and Transurban getting ahead of their skis to

1 cover this money. So we have a real problem in  
2 understanding is there fraud, is this good for Virginia  
3 citizens. What are the hidden costs? To say that there  
4 are no costs to Virginia citizens is really quite  
5 reckless. We know that there are, in storm mitigation, in  
6 vegetation, in the wolf walls, in the sound walls, in the  
7 money that has gone to study the EA versus the EIS.

8 So there's a lot around this money issue that  
9 makes us very concerned.

10 Secondly, the traffic issue. This is being  
11 told that it has independent utility, but if you look at  
12 the boards of the scope of the project, you can see that  
13 it stops at 267. So the causes of traffic here are the  
14 feeds on the shoulder lane, 267 and the bridge.

15 Creating flyover ramps and access to GWP,  
16 which was not a problem before, minor traffic, not a huge  
17 problem, creating that, all this false infrastructure,  
18 it's still -- I had a meeting with VDOT on Friday and the  
19 Dulles Interchange at Jones Branch is not even considered.  
20 There is not a plan to go forward with that.

21 This doesn't solve our traffic problems and  
22 yes we have COVID and I'm sure the gentleman before me has  
23 a really great crystal ball, but we should take a pause,

1 we should look at the traffic under current conditions, we  
2 should reevaluate the P3 and we should not coverup for the  
3 debt financing of Transurban.

4 We're killing our communities. We are killing  
5 our children of the future. For 2087 their ability to  
6 make changes, to decide what they want their traffic, what  
7 do they want their community to look like. Do they want a  
8 Springfield Interchange? It's -- I'm sorry, I'm so  
9 passionate, but I'm imploring, imploring our leaders to  
10 try to take a pause and sort through this.

11 There are many smart people involved on VDOT's  
12 side, on the citizen side and the final thing that is most  
13 upsetting is that this is a public hearing and this is the  
14 legal motion that sets forth the contractual beginning.  
15 This is the motion that allows the contract to go forward  
16 and we do not have the answers, we don't have the tests,  
17 we don't have the choke point studies, we don't have water  
18 mitigation, storm water mitigation. There's concern about  
19 the air. I even called the air people in Washington,  
20 D.C., let me see if I can pull up the email, and the woman  
21 says --

22 MS. HOLLAND: You have 30 seconds, Debra.

23 MS. BUTLER: Okay, how many seconds have I



1 spoken?

2 MALE VOICE: More than five minutes.

3 MS. HOLLAND: You've gone over five minutes.

4 MS. BUTLER: Okay.

5 MS. HOLLAND: Thank you.

6 MS. BUTLER: Yeah, okay, thank you. I've  
7 made my point. Now's not the time, we need to pause.  
8 Thank you and thank you all for listening.

9 MS. HOLLAND: Thank you, Debra.

10 MS. BUTLER: Thank you.

11 MS. HOLLAND: I'd like to go back to Paige  
12 Przylek who was before Debra. She's joined us by phone.

13 Paige, we're going to go ahead and unmute your  
14 line.

15 MS. PRZYLEK: Hi. Can you hear me?

16 MS. HOLLAND: Yes, we can. Please repeat your  
17 name.

18 MS. PRZYLEK: Hi, my name is Paige Przylek and  
19 I'm a concerned citizen of Virginia calling in and I do  
20 not support the 495 Next build alternative. We must not  
21 proceed before Maryland. The Environmental Assessment  
22 requires that the project impact to adjacent communities  
23 be evaluated, not just a national park.

1           A visual impact assessment of the flyover  
2 ramp should be completed, especially since every tree  
3 within the temporary construction easement will be  
4 removed. In many areas there will be no more screening  
5 between the ramps and roadway and residences.

6           Additionally, storm water management for this  
7 project has the potential to threaten the current water  
8 quality standards. As the expense of the construction  
9 and right of way impacts are presently not known, how can  
10 this be properly evaluated?

11           Purchasing credit from the Northern Virginia  
12 Stream Mitigation Bank in Reston is not acceptable to  
13 mitigate impacts to streams, the Potomac River, forest  
14 land, the view shed parkland and the community.

15           Thank you.

16           MS. HOLLAND: Thank you, Paige.

17           Next up is April Georgelas, who I believe has  
18 joined us by phone. April, we're going to go ahead and  
19 unmute your line.

20           MS. GEORGELAS: Thank you. Can you hear me?

21           MS. HOLLAND: Yes, we can. Go ahead.

22           MS. GEORGELAS: Thank you. I am April  
23 Georgelas. I oppose 495 NEXT Extension Project. I oppose

1 this unfair and inappropriate sham hearing. The tax  
2 paying public has been denied public meetings, public  
3 identification and explanation of major plan changes since  
4 May 20, 2019.

5 Susan Shaw said Monday, September 28 that this  
6 October 5th hearing is the same as the one postponed on  
7 March 12th. Yes, both are rushed, inappropriate, way too  
8 early sham hearings. Yes, there still have been no  
9 promised public meetings since May 20th, 2019, to update  
10 the public on plan design changes.

11 One public meeting is not enough. There were  
12 600 meetings for 66 extension. Yes, there were many  
13 unanswered questions before March 12th. There are the  
14 same questions and more questions now that are unanswered  
15 by VDOT. Yes, public comment text since May 20th, 2019  
16 are still not published on VDOT project sight as promised  
17 for public review.

18 VDOT wants to do future summaries, I oppose  
19 this further lack of public text transparency.

20 Yes, there are many plan changes since May  
21 20th, 2019 that are still not clearly public revealed  
22 listed and explained by engineers to the tax paying public  
23 in 495 NEXT impacted regions.

1 Requested meetings before March 12th did not  
2 occur. Plan elevations for the GW and Live Oak area that  
3 I requested repeatedly for elevations for three new  
4 flyover ramps, for new HOT Lanes, for new raised access  
5 ramp from Maryland to 193, new raised bridge to Live Oak  
6 Drive, the moving of Live Oak, tree removal, have never  
7 been forthcoming.

8 Required EA visualized, impact analysis was  
9 denied to resident requests before the March 12th hearing  
10 and after.

11 A resident was told October 2nd, Friday, by  
12 Susan Shaw and Abi Lerner that these extensive required  
13 community visualized impact analysis have not been done.

14 Historic Langley Club with 1,000 members  
15 requested a VDOT meeting before the March 12th sham  
16 hearing. It was denied and still has not occurred as far  
17 as members know.

18 Historic Langley Club on Live Oak will be  
19 devastated, ruined by 495 NEXT. Why the rush to a sham  
20 hearing and the sham project?

21 495 NEXT shows no benefits and public  
22 benefits. VDOT has not demonstrated public -- the project  
23 is in the public interest or there is a purpose and need.



1 Utility is not demonstrated. Phase One will  
2 be 193 to GW Parkway area. Dulles to 193 is to be delayed  
3 for Phase Two, if it ever happens. Maryland has no plans  
4 for a bridge and there is a major push back by many  
5 Maryland groups and legislators to not proceed at all.

6 There is no utility. There is an island of  
7 495 NEXT created increased general lane traffic congestion  
8 north to bottleneck choke point at GW area. HOT Lanes to  
9 nowhere, except to increase congestion for 495, local  
10 streets, McLean CBC, corridors for 123, Old Dominion, 193,  
11 Tysons region.

12 EA studies are inadequate and missing. Choke  
13 point studies do not include choke point traffic impacts  
14 for all before listed areas.

15 Supervisor Foust told BOS that the traffic  
16 congestion will be worse and this is not the right time  
17 for the project, there will be meetings, many meetings.  
18 Where are the promised and requested meetings?

19 Is one public meeting since May 20th, 2019  
20 really enough?

21 MALE VOICE: (Unintelligible)

22 MS. GEORGELAS: Is it fair and transparent?

23 No. The tax paying public has been ignored, excluded and

1 denied transparency and proper public process with this  
2 sham, inappropriate way too early hearing. Tax payers are  
3 being --

4 MS. HOLLAND: April, we've reached three  
5 minutes.

6 MS. GEORGELAS: -- Transurban. VDOT has this  
7 rushed inappropriate hearing without public input to check  
8 that box and Transurban can sign the contract. This is  
9 wrong. I oppose this inappropriate sham hearing and 495  
10 NEXT.

11 Thank you.

12 MS. HOLLAND: Thank you, April.

13 Okay. Our next three speakers, I'll call them  
14 in the order that we'll call on them, Karri Wonack, Mei-  
15 Mei Venners and David Sherman.

16 Calling on Karie Wonack, W-O-N-A-C-K.

17 MALE VOICE: (Unintelligible)

18 MS. HOLLAND: Okay, we'll go to the next one,  
19 Maymay Venners, V-E-N-N-E-R-S.

20 MS. VENNERS: I'm here. Can you hear me?

21 MS. HOLLAND: Yes, we sure can. Please repeat  
22 your name if you're ready to start your comment, thank  
23 you.

1 MS. VENNERS: Yeah, good evening. My name Mei-  
2 Mei Venners and I -- I don't have any prepared statement.  
3 I've been very intently listening to this meeting and I am  
4 a resident of McLean and I guess a couple of things.

5 I have several family members that are  
6 professional lobbyists and -- and what struck me tonight  
7 is I'd like to know where all of you live. Do you live in  
8 McLean? Does Abi Lerner live in McLean? Does Jason  
9 Stanford live in McLean? I'm a McLean resident. I'm also  
10 a real estate broker. I sell in Virginia, D.C. and  
11 Maryland. I do the commute to downtown DC every single  
12 day and I see -- I've been living in this area, I see the  
13 traffic and the impact that happened with the congestion  
14 and bottleneck at the American Legion Bridge when we did  
15 the original HOT Lane.

16 So I guess my questions are, you know, kind of  
17 as somebody who's not -- who has not read all of the  
18 studies and I'm not a lobbyist, I mean Jason, you were  
19 very supportive of this. I mean are you a transportation  
20 lobbyist? Are you being paid? Who conducted the studies  
21 that were done for the VDOT? I mean this is 100 percent  
22 privately funded is what I've been told.

23 I'd like to go back and refer to slide 16, 17

1 and 18 that Abi Lerner put up. If I read those correctly,  
2 one of them stated there was no difference in commute time  
3 if Maryland does not build.

4 So the question that I have is it doesn't make  
5 sense to me, why are we pushing this through? Do all of  
6 you live in McLean? Have you experienced the daily  
7 congestion? Are you being -- who's on the payroll?  
8 Who's being supported by Transurban? Those are my  
9 questions.

10 MS. HOLLAND: Thank you, Mei-Mei.

11 MS. VENNERS: So how do we get the answers to  
12 the questions before this -- it seems to us or me, and my  
13 husband is David Sherman, so he doesn't need to go next  
14 and maybe I'll take his three minutes, we don't understand  
15 how this is getting pushed through this quickly.

16 So we'd like the answers to those questions.  
17 Is that something that VDOT and the committee are  
18 agreeable to?

19 MS. SHAW: So this is Susan Shaw and I would  
20 just say I think, you know, our goal tonight is to allow  
21 people who wanted to comment publicly to go through those  
22 first and so we can certainly circle back when we complete  
23 receiving the comments from people to answer any



1 questions.

2 MS. VENNERS: Well, these are public comments.  
3 This is a public hearing. I'd like the answers. So we're  
4 posing questions but we're not getting any responses. And  
5 I'm not, again, I had not prepared questions, these are  
6 just from what I'm experiencing in this meeting.

7 So I would -- we -- I would assume that  
8 everybody would like the answers.

9 MS. SHAW: Well, I would just say that for the  
10 (audio skipping) quickly that are doing the study, which  
11 myself and, you know, Abi Lerner, we're employees of the  
12 state and so we're not paid privately by anyone.

13 We also report to -- there's other agencies  
14 that oversee all of our data and results that we've  
15 presented here tonight. You know, I think Abi has gone  
16 through those slides. We also had two nights of question  
17 and answer sessions last week where we spent four hours  
18 with the public answering questions. And we've gone  
19 through our traffic data and what we are showing is there  
20 is a benefit to the project and those slides that Abi went  
21 through for both the 2025 with and without Maryland and of  
22 course our 2045 scenario certainly show there are benefits  
23 and those would include Maryland, since Maryland has

1       been included by the entire region, are Maryland's project  
2       of two managed lanes on the Capital Beltway has already  
3       been included in the constrained long range plan, which is  
4       a regional transportation plan.

5               So with that, I think we'll move to our next  
6       commenter and certainly we can come back to questions if  
7       we have time at the time.

8               MR. CARY: And Susan, this is Rob, this is  
9       Rob Cary, I'm the Deputy Commissioner of VDOT and  
10      Secretary Valentine, Secretary of Transportation in  
11      Virginia, asked me to join the meeting tonight and I do  
12      just want to say that I mean there's been tremendously  
13      thoughtful comments tonight and I very much appreciate it  
14      on all sides.

15              We will take the comments. We will certainly  
16      have a question and answer session at the end of this,  
17      but we also -- this is not the end of it. We will take  
18      those comments and, you know, we will look at those and  
19      when we -- when there are questions like these, like Susan  
20      answered, we want to loop back with the people and talk  
21      with them about their concerns and questions.

22              So I just want to make it clear that this is  
23      not a finite process that at the end of tonight that's

1 the end of any interaction. We certainly want to make  
2 sure that you know that we are there, available. I would  
3 encourage you if, you know, if you haven't spoken directly  
4 with Susan, if you'd rather talk with me or the Secretary,  
5 I just want to assure you, the Secretary has very  
6 pointedly told me that, you know, she said look, I want  
7 you to go, I want you to be at the meeting tonight, I want  
8 you to go on Thursday, I want you to represent me there,  
9 report back on where we are on those issues and, you know,  
10 I can tell you the Secretary is very, very sensitive to  
11 the community. You know, VDOT, I tell our employees every  
12 day that we are about quality of life. We heard that in  
13 several comments here tonight and quality of life in all  
14 respects. There's eight and a half million people across  
15 Virginia. 2.2 million in Northern Virginia.

16 This project has impacts, no doubt about it  
17 and we want to make sure that we're doing the right thing  
18 for quality of life in that region. So I just want to say  
19 that, that this is -- taking these comments is a -- it  
20 does feel at times like a one-way dialogue. I understand  
21 that. There will be question and answer at the end. And  
22 we'll continue that dialogue after this meeting on into  
23 Thursday and beyond there.

1           So I just thank you for the time and really,  
2           thank you very much. As somebody that grew up in Northern  
3           Virginia, my daughter lived in Tysons, used to drive to  
4           Maryland every day to work, so she experienced that  
5           firsthand, I get it and I certainly want to make sure that  
6           you know you're being heard and that we are going to take  
7           all the comments seriously and that we're going to loop  
8           back and we want to see what makes the most sense on this.  
9           What are the comments, what can we do to make anything  
10          that we might do better.

11                 So that's all that I wanted to say. So thank  
12          you very much.

13                 MS. VENNERS: Rob, can I just -- this is Mei-  
14          Mei Venners just finishing up and Susan, thank you both  
15          for those comments.

16                 One last thing, my husband and I wanted to  
17          point out and talking about Transurban planning and city  
18          planning, you know, for those of us who have lived through  
19          the HOT lane expansion, what happened was we moved the  
20          traffic jam from the 66 area right to bottleneck at the  
21          American Legion Bridge and until Maryland agrees to their  
22          expansion and the bridge gets expanded I feel like this is  
23          going to be like the big dig, you know, we're going to do



1 all of this construction and disruption to the McLean -  
2 Fairfax interchange and it's going to be at a standstill  
3 until the other state does something. So it needs to be  
4 coordinated.

5 So thank you for your time everybody. I  
6 appreciate it.

7 MS. HOLLAND: Sorry about that. I was muted.  
8 Thank you, Mei-Mei.

9 David Sherman is next on the list. I don't  
10 know, David, do you still plan to make a comment or was  
11 that covered with MayMay's comments?

12 MS. VENNERS: (Audio skipping) covered with  
13 mine.

14 MS. HOLLAND: Okay, great. Thanks so much.

15 Okay. I'm going to call on the next three  
16 speakers that we're going to hear from tonight. Paul  
17 Butler, followed by Brenda Butler, followed by Omer Malik  
18 and then we still need to go back and get some of the  
19 earlier speakers that weren't on but had already reserved  
20 a spot to speak.

21 Paul Butler, go ahead.

22 MR. BUTLER: Can you hear me?

23 MS. HOLLAND: Yes, we can.

1 MR. BUTLER: Okay, thank you.

2 I'd like to take issue with one statement that  
3 was made earlier by Mr. Medford I believe it was that said  
4 that there aren't any studies that are showing any  
5 significant lasting impact on traffic and I would like  
6 everyone on this call to take a look at the most recent  
7 study done by the Northern Virginia Transportation  
8 Authority entitled COVID-19 Transportation Impacts and  
9 Opportunities and particularly slides 26 through 33 which  
10 talk about the various recovery scenarios predicted.  
11 These are data driven studies, very recently done and if I  
12 could just read from one of the slides about the 'New  
13 Normal Scenario Observations.'

14 All four scenarios assume a 10-15 percent more  
15 telework than pre-COVID levels, and school attendance  
16 levels close to pre-COVID levels.

17 All four scenarios reduce auto and transit  
18 trips

19 'Active Transportation' scenario has the  
20 largest impact for auto trips, 46 percent  
21 reduction.

22 'Cautious Recovery' scenarios has the largest  
23 impact for transit trips, 37 percent

1 reduction, and it goes on.

2 So you can see the best thinking now by the  
3 experts on what the impact of COVID is going to be traffic  
4 scenarios and while, as Debra said, nobody has a crystal  
5 ball on this, I think that argues for caution because we  
6 all don't know what the immediate future is going to look  
7 like. I mean I think if you could just pick up, if you  
8 could just go to McKinzie's website and you can see all  
9 the thinking that's being done about what the 'New Normal'  
10 looks like.

11 Secondly, we do have concerns, continued  
12 concerns, about the lack of transparency in the financial  
13 terms of this contract and we did look back at a newspaper  
14 article covering the initial project and it says, 'The  
15 contract between Virginia and TransUrban requires the  
16 state to pay subsidies if the numbers of car poolers  
17 reaches at least 24 percent of the total flow of all  
18 vehicles that are going in the same direction for the  
19 first 30 consecutive minutes during any day during which  
20 average traffic for the toll lanes going 3200 vehicles per  
21 hour.

22 Now that's a mouthful. But later on in the  
23 article a VDOT representative, Charlie Kilpatrick, says,

1 'Is there a backstop? The answer to that is yes. Do we  
2 think we'll get there? The answer to that is no. If we  
3 do, we still think it's a success.'

4 So there's been, you know, an acknowledgment  
5 to the press that there are some financial guarantees made  
6 to Transurban, so the notion that there are, quote-  
7 unquote, no subsidies in the contract, we're concerned and  
8 misleading. We're not accusing anyone of anything. We  
9 just don't have the facts and the information and we know  
10 now that, you know, the HOT lanes have a track record,  
11 right? We've seen the -- we've got a couple of years of  
12 studies to see whether these have been financially viable  
13 options and we haven't seen any studies or information  
14 telling us about how successful, how financially  
15 successful the HOT Lanes project has been up to the  
16 American Legion Bridge.

17 So this is two areas where we would like more  
18 information. We think this project needs to be  
19 reevaluated in light of COVID and we'd like more  
20 transparency on the financial terms of the contract with  
21 Transurban and specifically whether any obligated funds  
22 from the Commonwealth of Virginia, either now or into  
23 the future, if Transurban doesn't make enough money on



1 these lanes.

2 Thank you.

3 MS. HOLLAND: Thank you, Paul.

4 Now I'm calling on Brenna Butler. Please go  
5 ahead and unmute yourself and please repeat your name at  
6 the start of your comment. Thank you.

7 MS. BUTLER: Hi, I'm Brenna. I'm a resident  
8 here and a founder of Virginia Parks Matters and I'm  
9 speaking on behalf of the young citizens of McLean that  
10 represent the future. I know myself and many, many of my  
11 friends who signed petitions and went to previous hearings  
12 are very concerned about this project and the future of  
13 McLean.

14 Obviously I respect all of the adults in this  
15 area and the validity of their experience and points and  
16 opinions isn't lost on me. It's just hard for me to sit  
17 here and discuss the future of Northern Virginia when the  
18 ones making this decision may not live here when the  
19 project is going on or finished.

20 Although I'm as enraged as everybody that has  
21 spoken before me, I wanted to kind of appeal to your sense  
22 of humanity. The people in this area moved here to raise  
23 their children and have a safe place to walk their dogs

1 and they moved here because they appreciate the beauty and  
2 the importance of nature.

3 My family actually moved here from Brooklyn  
4 because they wanted to get away from the dirty congested  
5 traffic city. My parents wanted to have a place for us to  
6 walk their dogs and a place for me to ride my bike without  
7 having to be worried about getting hit by a car.

8 It's just McLean is becoming an area where  
9 people are not going to want to bring their families and  
10 it's going to become an area that people -- right now  
11 people are here because they feel like they can catch  
12 their breath and it's going to be an area where you can't  
13 do that.

14 Last night my family and I actually sat  
15 outside on our front porch and we were just listening to  
16 the sound of the trees and the birds and it was at night  
17 and you could briefly hear the traffic of 495. We live  
18 about .3 miles away and quiet for us is ambulance sirens  
19 and honking faint in the background. But we were just  
20 sitting there and enjoying the sounds and we started  
21 hearing owls. We've seen owls and foxes and bats and  
22 deers and rabbits.

23 So many things that make this place amazing

1 and unique to live and I just don't think that we should  
2 be the ones responsible for taking that joy away from the  
3 families and the residents that live in this area.

4 And I know people have spoken previously on  
5 crystal balls and mentioning the future and I'm not --  
6 obviously I don't have a crystal ball, none of us do,  
7 but these things happen time and time again, outcomes can  
8 be predicted and we can see what's going to happen is  
9 you're going to spend millions and millions, if not  
10 billions of dollars trying to force this solution on  
11 people that aren't educated enough on the topic and that's  
12 because most of this has been kept in the dark.

13 These residents don't know, people around here  
14 don't know and they want to ask questions and they want  
15 answers and you guys are going to profit, you're going to  
16 cut your losses and you get to leave at the end of the  
17 day, leaving the residents on the side of highway and  
18 people are going to leave, no one wants to live on the  
19 side of a highway, no one wants to worry about flyovers  
20 and noise pollution affecting their everyday life. People  
21 are going to flee this area before it catches on fire just  
22 like the west coast and when they leave, nobody's going to  
23 be left on the highways, no one's going to be paying the

1       ridiculously expensive tolls, no one's going to want to  
2       take responsibility for all the destruction that's been  
3       caused and what's going to happen when it's too late to  
4       realize that that destruction outweighs any pro of getting  
5       home faster?

6                     There used to be this big --

7                     MS. HOLLAND: Brenna, your three minutes,  
8       you've reached.

9                     MS. BUTLER: Okay. I'm actually speaking on  
10      behalf of a group.

11                    MS. HOLLAND: Okay, you have two more minutes  
12      then. Thank you.

13                    MS. BUTLER: Thank you. There's this big  
14      clock, I don't know if any of my environmental conscious  
15      friends know about this, but there used to be this big  
16      clock in Manhattan and it used to just say the time of  
17      day, it was a beautiful piece of art and now it's counting  
18      down until the damage left on our climate is irreversible  
19      and that clock now reads seven years, 87 days, 11 hours  
20      and 28 minutes. And in seven years and 87 days are we  
21      going to be the ones responsible for this destruction?

22                    I personally don't want to be and I want to be  
23      able to say that I did all I could for the planet that's



1 literally counting on us and I'm not trying to diminish  
2 the issue of traffic in this area, traffic is definitely  
3 an issue that needs to be solved, but we can't rush the  
4 solution and I don't understand how this project is  
5 serving VDOT's main purpose of quality of life because  
6 quality of life is not living on the side of a highway.

7 We can't prioritize the wrong things. Money  
8 doesn't matter more than people and a road doesn't matter  
9 more than a forest and one official's voice doesn't matter  
10 more than 1,000 voices it's supposed to represent and I  
11 think that this project is not serving its purpose, its  
12 not serving the citizens and its not serving the greater  
13 good.

14 Thank you for letting me comment on this. I  
15 really appreciate it and I do appreciate all the work  
16 that's been done. I think there is more work that needs  
17 to be done.

18 MS. HOLLAND: Thank you, Brenna.

19 MS. BUTLER: Thank you.

20 MS. HOLLAND: Okay. Our next commenter is Mr.  
21 Omer Malik. Please go ahead and unmute yourself and  
22 repeat your name.

23 MR. MALIK: Hi, my name is Omer Malik. Can

1 you guys hear me?

2 MS. HOLLAND: Yes.

3 MR. MALIK: So hey, thanks for giving me the  
4 opportunity to speak today. I do not support the 495 NEXT  
5 Build Alternative. I actually can see the flyovers from  
6 my house. I can hear them, seeing them is a big  
7 statement. I can see them when I step out in the  
8 courtyard and I can then see 495 if I walk a few steps.

9 So I do not support this project at all.  
10 There's, as previous speakers have spoke, Mei-Mei Venners,  
11 she actually helped me with a condo in D.C. once, there is  
12 a lot of lack of transparency on financial terms of the  
13 project.

14 Also, it seems like after spending all this  
15 effort in developing, we're going to gain five minutes,  
16 that is if Maryland builds the same HOT lane on the other  
17 line, seems ridiculous. And Maryland is not going to fund  
18 anything that does not include light rails to the best of  
19 my knowledge. I remember reading that and I think a  
20 previous speaker spoke to it.

21 So almost the purpose of this project is to  
22 have a HOT Lane going from GW Parkway, which itself is not  
23 a HOT Lane, it's for single use cars, it seems ridiculous

1 that Virginia will spend all this money, disrupt the  
2 neighborhood, disrupt the quality of life for everyone  
3 who lives across these three miles and build HOT Lanes  
4 just going to GW Parkway? It makes absolutely no sense.  
5 [Sic] The only reason you would consider this is  
6 bureaucratic inertia.

7 I can't think of any other reason you guys  
8 would go ahead with this project. It makes absolutely no  
9 sense. No common sense, no financial sense. There's no  
10 need. The best you will do is gain five minutes and with  
11 COVID restrictions, nobody's driving anymore.

12 I have friends who own companies who have  
13 openly told me most of their staff - and this is a guy who  
14 owns a company in Bethesda, he has 400 employees - all of  
15 them are going to work remote forever now. They're only  
16 going to come into the office when they need to for HR  
17 purposes, maybe social get togethers.

18 I'm a government contractor myself, also a  
19 commercial contractor and my work for the foreseeable  
20 future is working from home. Everybody -- most of the  
21 people who live in McLean area in these neighborhoods are  
22 either info-tech or have something to do with government,  
23 they're all working from home. So we see no value in

1 this.

2 Who's taking the GW Parkway onto these HOT  
3 lanes? Who's going to doing this five years from now  
4 when this project finishes? There's no crystal ball.  
5 This project makes absolutely no sense. I'm not blaming  
6 anyone, I'm not saying there's fraud, there's corruption,  
7 but I do know, but it would be really sad if you guys go  
8 ahead with this just because of bureaucratic inertia.

9 Thank you. I give my time to someone else.

10 MS. HOLLAND: Thank you, Omer.

11 We're going to go back up to Karri Womack, W-  
12 O-M-A-C-K or W-O-N-A-C-K. I think she has joined us by  
13 phone. We're going to go ahead and unmute your line.

14 (No response)

15 MS. HOLLAND: Okay, Karri Womack?

16 MS. WOMACK: Am I the last one?

17 MS. HOLLAND: I'm sorry?

18 (No response)

19 MS. HOLLAND: Karri, can you speak up? Are  
20 you on? Can you hear us or can you hear me?

21 MS. WOMACK: (Unintelligible) Hello?

22 MS. HOLLAND: Hi. Is this Kerry?

23 MS. WOMACK: Hi.



1 MS. HOLLAND: Karri?

2 MS. WOMACK: Yes.

3 MS. HOLLAND: Yes.

4 MS. WOMACK: We have -- we have some technical  
5 difficulties over here.

6 MS. HOLLAND: Okay, good, I'm glad we got you.  
7 Please go ahead and state your name for the record and  
8 then your comment, okay.

9 MS. WOMACK: Okay. I am Kerry Womack. I've  
10 been a resident for 20 plus years in McLean and I am  
11 vehemently opposed to the 495 NEXT Build Alternative.  
12 The HOT Lane Expansion proposal would extend the current  
13 HOT lanes all the way to the American Legion Bridge as we  
14 all know, but Maryland is currently in a fight over the  
15 bridge as well as the Beltway beyond it.

16 So they're still in the extensive study phase  
17 and are thus years from implementation if that is even  
18 the course that they decide to take.

19 These four lanes will have to merge back in  
20 at the bridge causing more gridlock. It does not make  
21 sense for Virginia to build ahead of Maryland and VDOT  
22 showed Fairfax County officials data and concluded that  
23 Virginia and the bridge had enough capacity that the

1 backup was the result of the Maryland side. So 495 north  
2 of the Beltway and 270 cannot handle the volume.

3 VDOT supervisor Susan Shaw and County  
4 Supervisor Foust stated, The ultimate solution is with  
5 Maryland. The proposed new lanes and flyover ramps in  
6 Virginia are moving the problem, not solving the problem.  
7 So that is the main deal.

8 And also on another note, I was driving out  
9 of my cul de sac yesterday and I saw this huge spotted owl  
10 flying from branch to branch and then to the deck of our  
11 neighbor's house and VDOT has claimed that there are no  
12 nesting species in this area and that's absolutely false.

13 We have nesting spotted owls and just recently as  
14 September 3rd the Wall Street Journal did an article on  
15 how they are a threatened species and so that is  
16 concerning as well.

17 We also have bald eagles that fly over our  
18 neighborhood on, you know, maybe an every other day basis  
19 and so that is a concern and I'm concerned that VDOT has  
20 claimed that there are no nesting species in this area  
21 because that's completely false.

22 That's it.

23 MS. HOLLAND: Okay. Thank you, Karri.

1 MS. WOMACK: Thank you.

2 MS. HOLLAND: We're going to go back to  
3 speakers that had signed up and that we didn't hear from  
4 earlier, we're going to go ahead and go back through those  
5 names.

6 Craig and Susan Tenney, T-E-N-N-E-Y. If  
7 you're on please unmute yourself.

8 (No response)

9 MS. HOLLAND: Okay. Andrew Churchill.

10 (No response)

11 MS. HOLLAND: Patrick Lynch.

12 (No response)

13 MS. HOLLAND: Steven Swift.

14 (No response)

15 MS. HOLLAND: Steven Swift.

16 (No response)

17 MS. HOLLAND: Alice Zhou, Z-H-O-U.

18 (No response)

19 MS. HOLLAND: Jeffrey Parnes, P-A-R-N-E-S.

20 (No response)

21 MS. HOLLAND: Okay. We have individuals that  
22 would like to speak that have signed up through our chat  
23 box. The chat box is open, if you would like to make a

1 comment please go ahead and type in your name and state  
2 that you'd like to make your comment.

3 If you're running into any issues getting  
4 through to us, if for some reason you're on the phone and  
5 you're trying to make your comment and we're not seeing  
6 your hand on our end, please call our technical support  
7 number at 703-691-6715 that way we can make sure you're  
8 called upon this evening.

9 Okay. The next three individuals I'll ask to  
10 go ahead and provide your comments Kathleen Nawasz, N-A-W-  
11 A-S-Z, followed by Bridget O'Toole, followed by Shawn  
12 Newman. We're going to call on Kathleen Nawasz first,  
13 which is by phone, correct?

14 MS. NAWASZ: Actually I am through the  
15 internet. Are you able to hear me?

16 MS. HOLLAND: Yes, we are, loud and clear.  
17 Please go ahead and state your name and your comment,  
18 thank you.

19 MS. NAWASZ: Okay, sure. My name is Kathleen  
20 Nawasz and I live off of Balls Hill Road in McLean, have  
21 been here since 1989 and I have a comment and a question.

22 My comment is that I, with many others on the  
23 call, do not support but oppose this extension for several



1 reasons. For me, the ones that are most important are  
2 that coming from a background of energy analysis as well  
3 as a period of time in transportation I do think that  
4 reducing vehicle miles traveled is -- I don't see the  
5 analysis really supporting that.

6 Often times what happens when you increase the  
7 capacity of a road, you just, as someone else mentioned,  
8 you just have a situation of induced demand. So I think  
9 that's what would happen here. We of course then do have  
10 the COVID situation and we do -- you know, I think that at  
11 a minimum we don't understand what that is, how that's  
12 going to impact it.

13 I also don't -- I looked through the analysis  
14 and I didn't see anything to say that the cut-through  
15 traffic in my neighborhood would be addressed by this, so  
16 that's something not good.

17 The other thing is that I looked through all  
18 of the comments from the May 2019 hearing and, you know,  
19 many of them, the majority were not supportive for lots of  
20 reasons and I think the issue with respect to acting  
21 without being in complete coordination with Maryland and  
22 at the same time as them is problematic.

23 But I just want to conclude by saying that my

1 question, which is I would really like to better  
2 understand where the transparency is in this process. I  
3 mean I think it's great to have these public hearings. I  
4 think it's appropriate and obviously legally required to  
5 have these meetings, but my question is how are these, the  
6 inputs that you receive in these meetings, reflected in  
7 the decision making process from a very kind of explicit  
8 stand point and -- because, you know, as I say I think  
9 transparency is really important in understanding how the  
10 process is made. It seems when I'm looking over the  
11 documents and hearing some of these presentations, it  
12 seems like a *fait accompli*, that the decision has been  
13 made and it's going through the motions of this and I  
14 think that would be in fact very unfortunate.

15 So I'd like to understand better how the  
16 public's I think excellent questions, specifically with  
17 respect to running the analysis again, coming up with  
18 different scenarios other than just the one, how that will  
19 be reflected in the decision making process and that would  
20 be it.

21 I want to thank you very much. I also want to  
22 thank Senator Favola and Delegate Kathleen Murphy, both of  
23 whom are my representatives and I appreciate them and you.

1 Thank you so much.

2 MS. HOLLAND: Thank you, Kathleen.

3 We're going to go ahead and go to Bridget  
4 O'Toole now. Bridget, if you could please unmute  
5 yourself.

6 MS. O'TOOLE: Okay. Hi, this is Bridget  
7 O'Toole, thank you. I think a comment in that just from  
8 the beginning this has felt very rushed and I've been  
9 concerned about not looking at other alternatives and one  
10 of the things that I guess a side benefit of COVID is that  
11 it really has changed traffic patterns at least for the  
12 foreseeable future and given us now the opportunity to  
13 look at all types of other alternatives, rail, different  
14 crossing locations, other designs and that I think now we  
15 have the benefit and the opportunity and the time to look  
16 at these other alternatives and I'm asking that you do  
17 that and that if you chose not to and to move forward,  
18 I'm asking for you guys to then provide assurances that if  
19 you do move forward with Transunion - with Transurban,  
20 sorry - that you will, that you'll give us -- you'll  
21 provide assurances that you're not going to renegotiate  
22 any financing or any prior contracts if you decide to move  
23 forward with them now, because there doesn't seem to be a

1 good reason to move forward with this right now unless  
2 it's to renegotiate something that currently exists.

3 MS. HOLLAND: Thank you, Bridget.

4 Shawn Newman, N-E-W-M-A-N, you can go ahead.

5 MR. NEWMAN: I'm about to speak at public  
6 meeting, honey if you'll just give me --

7 MS. HOLLAND: Shawn, you're unmuted.

8 MR. NEWMAN: One moment, please, sorry.

9 (Brief pause)

10 MR. NEWMAN: My name is Shawn Newman. I am a  
11 board member with FABB but I am speaking on behalf of my  
12 - FABB is Fairfax Alliance for Better Bicycling - but I  
13 am speaking on behalf of myself tonight.

14 I personally do not support this project as  
15 currently proposed. I believe, like previous speakers  
16 have noted, that it does not include sufficient transit.  
17 It focuses far too much on increasing or decreasing --  
18 increasing level of service for single occupancy vehicles  
19 without adequately meeting the Virginia State  
20 Transportation Demand Management Requirement as was  
21 levied by the legislature this year and signed by the  
22 governor.

23 This project will not manage transportation.



1 This will simply increase the number of vehicles that  
2 will travel on this and as previous callers have also  
3 mentioned, it will increase the total vehicle miles  
4 traveled for our area.

5 That said, if the project does go through as  
6 currently envisioned, I fully support the bicycle lane,  
7 the shared-use path that is intended to be built outside  
8 of the sound wall.

9 Additionally, we would say that the path must  
10 be grade separated. It must include upgraded traffic  
11 signals at the Georgetown Pike intersection because those  
12 intersections are very potentially dangerous for  
13 pedestrians and cyclists using the trail.

14 The trail crossings at Georgetown Pike and  
15 Old Dominion Drive need adequate signage to alert  
16 motorists along with adequate areas clear of foliage and  
17 other obstacles that might limit sight distance for  
18 approaching drivers.

19 As the previous sign or, excuse me, the  
20 previous plans that I have seen, the crossings at the  
21 Georgetown Pike intersections look especially dangerous  
22 because that is where the trail moves from one side to  
23 the other and trail users are expected to cross high

1 speed on and off ramps.

2 Additionally adequate wayfinding signage must  
3 be included to get riders and pedestrians from the 495  
4 shared-use path to Lewinsville Road and into Tysons to  
5 connect to existing and planned trails. This would be  
6 absolutely necessary because in order for people to  
7 connect with Tysons from the 495 shared-use path, they  
8 would have to thoroughly understand how to get there on  
9 separate -- on side roads, ie the Lewinsville Road.

10 Thank you very much. That concludes my  
11 comments.

12 MS. HOLLAND: Thank you, Shawn.

13 Okay. The next three speakers that are up  
14 are Sharon Gamble, Paul Kohlenberger, and Maureen  
15 O'Donnell.

16 Calling on Sharon Gamble please.

17 MS. GAMBLE: Okay. Can you hear me?

18 MS. HOLLAND: Yes, we can.

19 MS. GAMBLE: Okay.

20 MS. HOLLAND: Please go ahead and repeat your  
21 name. Thank you.

22 MS. GAMBLE: My name is Sharon Gamble. I am  
23 a resident of McLean. I grew up in McLean. I do not live

1 near the Beltway, but I do frequently commute northbound  
2 on 495 to Maryland in the morning.

3 I do not support the 495 NEXT Built  
4 alternative prior to the Maryland project approval and  
5 implementation. I would certainly support it once  
6 Maryland has approved it and started implementation.

7 My reason for that is I did read every page  
8 of the Traffic and Transportation Technical Report and I  
9 especially focused on Appendix I which provided the  
10 analysis of conditions prior to the Maryland project.

11 Based on the key indicators I saw, which I  
12 didn't focus on the fast lanes, because we can't -- it's  
13 not really a good path for us to get to the bridge, the  
14 key indicators to me showed that traffic in the general  
15 purpose lanes, especially in the morning northbound rush  
16 hour, will get worse until the Maryland project is  
17 implemented.

18 In addition, the already lengthy rush hour,  
19 which according to the report is four hours in the morning  
20 and six hours in the evening, will become longer prior to  
21 the Maryland project.

22 I am in favor of this project after the  
23 Maryland project has been approved and Maryland has

1 confirmed where the bridge will be located and funding and  
2 has a schedule date for the project.

3 Thank you very much.

4 MS. HOLLAND: Thank you, Sharon.

5 Okay. The next speaker is Paul Kohlenberger.

6 MR. KOHLENBERGER: Good evening. My name is  
7 Paul Kohlenberger and I serve as president of the Greater  
8 McLean Chamber of Commerce.

9 I'm joining you this evening to convey that  
10 the Greater McLean Chamber of Commerce strongly supports  
11 the 495 NEXT Project to extend the 495 Express Lanes to  
12 the George Washington Memorial Parkway. The 495 NEXT  
13 Project supports the Chamber's mission to strengthen the  
14 economic environment of the Greater McLean Community. It  
15 does so in the short run by directly creating jobs, but  
16 much more importantly, in the long run by providing new  
17 travel choices and improving safety on our local streets  
18 as well as on the Beltway itself.

19 The improved transportation infrastructure  
20 will help retain and attract area employment opportunities  
21 and support commercial, cultural and civic activity in the  
22 McLean Community Business Center and Tysons urban center.

23 Additionally, the project offers the



1 opportunity to provide bus rapid transit to and from  
2 Maryland destinations.

3 The 495 NEXT Project will serve the interests  
4 of the Greater McLean residential community. This is of  
5 great interest to the Chamber which, since 1961, has  
6 prided itself on supporting the community.

7 It is also of great personal interest to me as  
8 someone who has lived here in McLean since 1985. The  
9 improved transportation infrastructure provides local  
10 travelers with additional time saving choices. The  
11 project offers additional shared-use trails to area  
12 residents.

13 Perhaps most importantly, the project improves  
14 safety on our local streets. Our neighborhoods in McLean  
15 flanking the Beltway have for years been plagued by  
16 traffic that is trying to reach the Beltway and get across  
17 the American Legion Bridge.

18 495 NEXT Project is projected to offer marked  
19 reductions in cut-through traffic, improving safety for  
20 our community and reducing travel delays on our street.  
21 The project will improve the quality of life for thousands  
22 of McLean residents.

23 A final point, as a proud Virginian, when

1 Maryland is proposing to do the right thing, then we feel  
2 the only gentlemanly thing to do is to meet them half way.

3 Thank you for considering the stance of the  
4 Greater McLean Chamber of Commerce. The 495 NEXT Project  
5 is important to the economic and civic future of the  
6 Greater McLean area and Fairfax County. The Commonwealth  
7 should move forward with this project. Thank you.

8 MS. HOLLAND: Thank you, Paul.

9 I'm going to announce the next three speakers.  
10 We're going to go to Maureen. Please mute your lines.  
11 Thank you. Please mute.

12 We're going to go to Maureen O'Donnell and  
13 then we're going to go to Flint Webb and then Dot Harney.  
14 Maureen.

15 MS. O'DONNELL: Yes, good evening everyone.  
16 My name is Maureen O'Donnell. I strongly oppose this 495  
17 Extension. It's reckless in the light of climate change  
18 to go forward with transportation plans that focus on  
19 single use fossil fuel powered vehicles.

20 We know that roads are heat sinks. We know  
21 that cars are heat sinks. We know that single occupancy  
22 vehicles increase greenhouse gases and we know that  
23 widening roads doesn't in the long run improve congestion.

1 We also know that trees and green spaces mitigate climate  
2 change.

3 This is one of the highest educated  
4 communities in the country and yet we plow forward with  
5 the same types of projects that contribute to scarring our  
6 land, destroying trees, destroying habitat, reducing green  
7 space and increasing climate change.

8 I am a resident of McLean, although my  
9 property is not directly impacted by the project, this  
10 seems to be the type of project that will destroy quality  
11 of life and property values for people who live along  
12 that corridor and I care about those people. I see along  
13 66, the widening of 66 and what has happened to personal  
14 property with the road going straight off into people's  
15 back yards where they used to have a backyard and I just  
16 wonder how the government, how can politicians allow that  
17 to happen to their constituents.

18 We are at a point that we need to consider  
19 that we have -- that we are living in a new normal.  
20 Climate change and COVID are showing us the new normal.  
21 We need to wake up to this and I believe government will  
22 have the discipline to lead the way. Thank you.

23 MS. HOLLAND: Thank you.

1 Flint Webb next.

2 MR. WEBB: Hi, my name is Flint Webb, I'm the  
3 environment chair for the Fairfax County Federation of  
4 Citizens Associations and for the Providence District  
5 Council, but my comments today are my own. I live in  
6 Vienna, Virginia.

7 I would like to point out the two basic  
8 issues. One is that I don't think it's sufficient to --  
9 sufficient retention to just look at the additional  
10 impervious surfaces caused by the project, especially when  
11 you look at the impacts and climate change, which is going  
12 to be increasing the storm intensity, duration  
13 frequencies. And then my other comment is that there is  
14 no -- you haven't addressed the issue of hazardous air  
15 pollutants and I point out that I recognize that most of  
16 the time NEPA doesn't evaluate hazardous air pollutants,  
17 but there is the Urban HAPs program under EPA Clean Air  
18 Action Section 112(c)(3) which does require some analysis  
19 of hazardous air pollutants and I think you need to  
20 include that in your analysis.

21 Thank you very much.

22 MS. HOLLAND: Thank you.

23 Okay. Our next three speakers are Dot Harney,



1 followed by Joyce Harris, followed by Vijay Doddi, D-O-D-  
2 D-I.

3 I'm going to ahead and call on Dot Harney to  
4 go first.

5 MS. HARNEY: Hello, can you hear me?

6 MS. HOLLAND: Yes, we can. Please go ahead  
7 and restate your name.

8 MS. HARNEY: Hi, my name is Dot Harney. I am  
9 a resident of McLean, a community citizen and most  
10 important, I'm a taxpayer and a voter, which should be  
11 important to everybody.

12 I do not support the 495 NEXT Build  
13 Alternative. We must not proceed before Maryland. The  
14 Environmental Assessment requires that the project impact  
15 to adjacent communities be evaluated, not just the  
16 national park, an official impact assessment of the  
17 flyover ramp to be completed, especially since every tree  
18 within this temporary construction easement will be  
19 removed. In many areas there will be no screening between  
20 the ramps and roadway and residences.

21 Additionally, there is little to no storm  
22 water mitigation and this storm water flows into the  
23 Chesapeake Watershed. The storm water management for

1 this project has the potential to threaten the current  
2 water quality standards.

3 If the extent of the construction and right-  
4 of-way impacts are presently not known, how can this be  
5 properly evaluated?

6 Purchasing credits from the Northern Virginia  
7 Stream Mitigation Bank in Reston is not acceptable to  
8 mitigate impacts to streams, the Potomac River, forested  
9 lands, the Viewshed Parkland and the community.

10 I am also a big fan of the spotted owls that  
11 we see in our parks and I don't believe the people who say  
12 there are no nested animals. I see -- I see owls, I see  
13 squirrels, I see the eagles and I just think you need to  
14 save our parks. Thank you.

15 MS. HOLLAND: Thank you, Dot.

16 Okay. I'm calling -- we have three more  
17 speakers signed up to speak. If you could go ahead and  
18 mute your lines if you're not talking. Thank you.

19 We are approaching 9:30. So we're going to  
20 go ahead and close our chat box. We have three remaining  
21 speakers that are signed up and nobody waiting on the  
22 phone as far as we can tell. If we're mistaken, you know,  
23 please send us a quick note or call our technical number

1 to let us know, 703-691-6715.

2 Otherwise, we're going to go ahead and hear  
3 our three speakers and then we're going to go ahead and do  
4 some closing announcements for the night.

5 So Joyce, if you could go ahead and get  
6 started and please be sure to state your name and I'm  
7 asking everyone if you're not speaking to please mute  
8 your lines because we are hearing a little bit of  
9 feedback. We want to make sure we can hear our speakers.  
10 Thank you.

11 MS. HARRIS: Hi, my name is Joyce Harris and  
12 I've been a resident of McLean for 36 years. There may  
13 be benefits to this project, but there are also losses. I  
14 am primarily concerned about the loss of plant life if  
15 this project moves forward.

16 More than three acres of Scott's Run Nature  
17 Preserve, the jewel of McLean, will be impacted  
18 temporarily or permanently. According to the preserve's  
19 website, the preserve is one of the country's most diverse  
20 natural landscapes and one of the rarest biological  
21 ecosystems in the Mid Atlantic.

22 This is a significant potential loss, another  
23 loss. 118 acres of trees may be removed. Think of it,

1 118 acres. Will 118 acres of trees be replaced?

2 I urge VDOT to carefully and generously  
3 mitigate these losses by working closely in partnership  
4 with the community and the agencies and groups involved  
5 in overseeing this landscapes. Thank you.

6 MS. HOLLAND: Thank you, Joyce.

7 Calling on Vijay Doddi, D-O-D-D-I, to go  
8 ahead.

9 MR. DODDI: Hello, my name is Vijay Doddi.  
10 Thank you for the opportunity today for the comment. Most  
11 of my comments were covered by other participants, so I'm  
12 going to cover the ones that are not.

13 I second the option that the analysis that  
14 was done was inadequate, primarily for the reason that all  
15 the numbers shown by VDOT regarding the assessment of  
16 travel times, improvement of the travel times, were done  
17 prior to the pandemic period. Even the onset of the  
18 pandemic that we have, I strongly believe that those  
19 numbers are invalid.

20 Then also I want to bring it to the notice of  
21 the parties present that the residents of McLean primarily  
22 are the people who use the pathways that lead into 495 and  
23 the Georgetown Pike, 123, Old Dominion and we are also



1 impacted with not only the travel times, but also our  
2 properties are impacted.

3 For example, the design flaws that we see that  
4 the bike trail is outside the noise barrier wall. So  
5 there is no separation, so basically the bike trails are  
6 running through our properties, which would be an invasion  
7 to our privacy and our homes.

8 So we strongly -- I strongly oppose this  
9 particular project in the current fashion and I also think  
10 that without Maryland onboard it, we in spending all this  
11 money and spending all this -- causing all this loss would  
12 be a great loss to the citizens utility and the public  
13 property at the cost of prioritizing with the public  
14 liability.

15 Thank you for the opportunity.

16 MS. HOLLAND: Thank you.

17 We have another speaker sign up right before  
18 we closed the chat, so we have two speakers remaining,  
19 Kristi West, followed by Eric Farnsworth.

20 Kristi, if you would go ahead with your  
21 comment.

22 (No response)

23 Kristi West, please go ahead and unmute

1 yourself and restate your name and go ahead.

2 (No response)

3 Okay. Kristi, if you are here by phone,  
4 please press star 3 to raise your hand so that we can  
5 identify which number you are and unmute you.

6 MALE VOICE: (Unintelligible)

7 MS. HOLLAND: Okay, you are on the phone.  
8 We're going to go ahead and unmute you. Please go ahead  
9 and state your name and go ahead with your comment.

10 MS. WEST: Can you hear me?

11 MS. HOLLAND: Yes, we can.

12 MS. WEST: Okay. My name is Kristi West.  
13 Thank you for giving me the opportunity to speak. I would  
14 like to say that I strongly oppose the 495 NEXT Project.  
15 I am a resident of Live Oak Drive. Our property is  
16 impacted by this project unlike some of the speakers who  
17 spoke in favor of this project earlier tonight, it is my  
18 neighborhood and my property that is impacted.

19 We already deal with excessive noise on Live  
20 Oak Drive. Our property faces the GW Parkway ramp. We  
21 have experienced the surveyors and other workers that have  
22 been in the neighborhood marking off places that we were  
23 told were not going to be impacted by this project, which

1 obviously are as they are taking soil samples and doing  
2 other preparatory work.

3 I'm also concerned about the effect of the two  
4 entities, HTC at 850 Balls Hill Road and also the Langley  
5 Club. I do not see how this project is going to alleviate  
6 the cut-through traffic in our neighborhood. The effects  
7 of the water run off that will impact Scott's Run and the  
8 delicate ecosystems in that park.

9 Our family has the privilege of enjoying  
10 tracking the wildlife and plant life in that park  
11 throughout the season. We have been tracking the spotted  
12 owls since early spring. We are well aware that there are  
13 nesting species, including eagles and other animals and  
14 bird life in this area, which is contradictory to your  
15 report.

16 We are also disturbed by the lack of  
17 transparency that my neighbors have already referenced  
18 earlier this evening in the impact to our neighborhood  
19 specifically and our quality of life and our property  
20 values.

21 Thank you for giving me the opportunity to  
22 speak and hearing our concerns.

23 MS. HOLLAND: Thank you, Kristi.

1           Okay. Our last speaker of the night is Eric  
2 Farnsworth and once Eric provides his comments we have  
3 some closing announcements before we conclude.

4           You can go ahead, Eric.

5           MR. FARNSWORTH: Hi, good evening, thanks for  
6 fitting me in. I know I'm right here under the bell, but  
7 I appreciate it. This is Eric Farnsworth. We've lived in  
8 McLean for over 20 years on one of the feeder roads that  
9 goes to Georgetown Pike and I'm not an expert on the  
10 project so honestly I can't say that, you know, I support  
11 it or don't support it, but I just wanted to thank all of  
12 you for taking this process so seriously.

13           On the feeder roads we're dying. Once the HOT  
14 lanes got extended and the interchange with Georgetown  
15 Pike and 495 became so congested, it's almost impossible  
16 to get out of our own driveways at certain times during  
17 the days and when you try to get to say Langley High  
18 School or across 495 from West McLean to East McLean or  
19 vice versa, it's virtually impossible to do so at certain  
20 times during the day and, you know, fortunately we haven't  
21 had problems with emergency services or ambulances or  
22 things like this but some of our elderly neighbors have.

23           So my main point is simply to say there have



1 been a lot of people this evening who have been talking  
2 delay, who have been talking about let's wait until  
3 Maryland get's its act together and then try to merge up  
4 somehow, that's great in theory, but the problem is now  
5 and it's getting worse and so from somebody who's actually  
6 affected by it daily, yes I have environmental concerns,  
7 yes I support, you know, mitigation for global climate  
8 change issues, yes I support, you know, wildlife and such  
9 things, but at the end of the day we have to find a  
10 solution and I don't think we can wait until Maryland gets  
11 its act together.

12 So I just wanted to thank everybody for taking  
13 this process so seriously and just an encouragement that  
14 we really find a way forward to help out for those of us  
15 who are living this problem on a daily basis.

16 Thanks very much for listening.

17 MS. HOLLAND: Thank you, Eric.

18 Okay. Before we get into our closing  
19 announcements, I just wanted to open it back up and ask  
20 our elected officials, did you want to offer any closing  
21 announcements before we conclude tonight? If you do,  
22 please go ahead and unmute yourself.

23 SUPERVISOR FOUST: This is Supervisor Foust, I

1 mean I just very much appreciate the really in depth and  
2 thoughtful analysis. I definitely think issues have been  
3 laid at the feet of VDOT that need to be addressed. We  
4 need a lot of answers and I look forward to it. The  
5 County itself has many community issues that VDOT is going  
6 to respond to, I know you will, but I think that -- my  
7 understanding was that all the comments tonight would be  
8 addressed by VDOT as part of this process.

9 Is that not correct? That is correct, right?

10 MS. HOLLAND: That's correct.

11 SUPERVISOR FOUST: Okay. When can we expect  
12 to see that response?

13 MR. CARY: We have --

14 MS. SHAW: Well I explain --

15 MR. CARY: Go ahead, Susan.

16 MS. SHAW: Okay, just that we do have the  
17 comment period remains open until October 23rd. So we're  
18 still in the process of gathering comments and certainly  
19 we appreciated the ones that we received tonight, but, you  
20 know, any comments that we receive, you know, we will  
21 still be considering. So after that, then we will go  
22 through a process of reviewing the comments, working on  
23 responding to them and during that time period we'll be

1 reaching out to our partners certainly at the County and  
2 others to get those answers, so I would expect it would be  
3 at least, you know, 30 to 60 days for us to compile and  
4 work on responding.

5 MR. CARY: And, Supervisor Foust, I'd like to  
6 add - this is Rob Cary again - you know, we're going to go  
7 through that process. There have been very thoughtful  
8 comments tonight and they're going to get the due time  
9 that they deserve to really thoroughly review them.

10 So I just want to say that while we have the  
11 schedule, the schedule will not dictate the time it takes  
12 to do a thorough job on this. We're going to definitely  
13 be reviewing that in the Secretary's office as well.

14 So I just wanted to make sure you knew that,  
15 that it's going to take a lot of effort to go through  
16 these because there have been very thoughtful comments  
17 given.

18 SUPERVISOR FOUST: Okay. I want to take this  
19 opportunity to thank you very much for taking the time to  
20 sit in. It's very important that VDOT at the highest  
21 level of public transportation participate and be aware of  
22 what our concerns are.

23 So thank you and I know Mary Hynes sat through

1 this presentation and she's on the Transportation Board in  
2 Richmond. Hi, Mary. Really appreciate your  
3 (Unintelligible) tonight there's a lot of issues that  
4 have to be addressed.

5 Thank you.

6 MS. HOLLAND: Thank you, Supervisor.

7 Delegate Murphy.

8 DELEGATE MURPHY: Thank you. First of all I  
9 want to thank everyone because this was really such good  
10 participation on the part of our community. I'm really  
11 impressed with these presentations and I'd like to just  
12 make sure that they get these answers some place where  
13 they can actually read them because they're going to take  
14 more than a momentary yes or no on most of these answers.

15 And I'd like to thank Secretary Valentine, who  
16 I have been speaking with for her attention to this matter  
17 and I'd like you to take that back to her please. But I  
18 really do -- I'm looking forward to seeing these  
19 responses, not just in passing but in fact done thoroughly  
20 and in response to the many questions that people had  
21 tonight and thank you, because I thought it was a great  
22 presentation and opportunity for people to be heard.

23 Thank you.



1 MS. HOLLAND: Thank you, Delegate.

2 Senator Favola, are you still on the line?

3 (No response)

4 Okay. Mary Hynes, did you want to make any  
5 comment?

6 (No response)

7 I just wanted to open it up in case you did.

8 MS. HYNES: No, thank you, Michelle, I  
9 appreciated everybody's time tonight and certainly learned  
10 a lot in listening. Thanks very much.

11 MS. HOLLAND: Thanks, Mary.

12 Okay. And then Rob and then Susan and then  
13 I'm going to go ahead and do some quick administrative  
14 announcements and we'll go ahead and conclude.

15 Rob.

16 MR. CARY: Yeah, thank you and again, I  
17 couldn't have said it better than the people that just  
18 spoke. I mean it's a tremendous input. That's what this  
19 whole process is about and I do have to say that I really  
20 do appreciate it when, you know, on a broader stage we  
21 don't always see the discourse that we need and this  
22 tonight was very, very helpful to us and it's exactly what  
23 we wanted. What we needed is to hear from people about

1 their concerns, their desires and so forth and we fully  
2 intend to evaluate all of that.

3 We will -- we will work to do that internally.  
4 We also, you know, we do have a Commonwealth  
5 Transportation Board and I want to thank Ms. Hynes for  
6 being on this tonight. She does a really yeoman's job on  
7 the board, always dedicated, always asks deeply probing  
8 questions and you're very fortunate to have her represent  
9 your area, but you can rest assured Secretary Valentine  
10 asked me to, you know, get deeply involved in this, report  
11 back to her, be her liaison on this and I intend to do  
12 that as best I can.

13 Secretary Valentine is committed to an open,  
14 transparent process that results in the best decision,  
15 whatever that is and I just want to say that. It's, you  
16 know, it is to result in the best decision. So thank you.

17 MS. HOLLAND: Thank you, Rob.

18 Susan, any closing remarks??

19 MS. SHAW: Just the only thing I would note is  
20 that I know we did not get to any questions. We saw some  
21 as part of the comments and some that were in the chat  
22 room and we'll be looking at those over the next several  
23 days to see, any that we can provide answers to we'll do

1 so on our website.

2 We do have a frequently asked questions  
3 section there and we'll continue to add questions and  
4 answers as we, you know, see them come through and can  
5 add them to that out there on our website.

6 MS. HOLLAND: Thank you.

7 Okay. Thanks everyone. Thanks to all of our  
8 officials. Thanks to Susan and Abi for a great  
9 presentation and of course all of the great comments that  
10 we've received.

11 Some closing announcements before we finish up  
12 tonight. We do have this Thursday, October 8, we have an  
13 in-person, by appointment only, public hearing. We will  
14 be available between the hours of four to eight p.m. at  
15 the McLean -- Susan can you hear me? Sorry, I thought we  
16 had a technical glitch.

17 Okay. Our in-person public hearing is this  
18 Thursday, October 8 from four until eight p.m. at the  
19 McLean Community Center. That's at 1234 Ingleside Avenue,  
20 McLean.

21 You must schedule an appointment in advance if  
22 you plan to attend this. You can do so by going to our  
23 website at [495NorthernExtension.org](http://495NorthernExtension.org) or calling 703-691-

1 6715. We need to make sure that you have an appointment  
2 so that we can make sure that we have only a limited  
3 number of people there for safety reasons.

4 We will be following CDC recommended health  
5 measures. Anyone that is there must have a mask on and we  
6 will be enforcing social distancing. And again, you must  
7 have an appointment to attend.

8 Once you're there, we will have our  
9 presentation that we provided tonight. We will be showing  
10 that on our loop so you can watch that. We will have  
11 limited on-site staffing so that we can comply with the  
12 COVID restrictions, but we will have our additional, our  
13 technical resources, subject matter experts available  
14 virtually to answer any questions that you might have.

15 We're limiting it to one person per time slot  
16 or two people if you're from the same family. But again  
17 you can get more information on available time slots by  
18 going to our website or calling that number.

19 You can provide your comments for the public  
20 record if you are there to our court reporter or you can  
21 complete a written comment form and leave it in the  
22 comment box and those comments will be included.

23 Next slide.



1           As has been mentioned tonight, I want to  
2       reemphasize that the public comment period is open until  
3       October 23rd. Any comments that have been received since  
4       we first made materials available on February 26 up  
5       through October 23 will be included in our formal public  
6       record for the project. If you've already --

7           MS. SHAW: Michelle, I think it's important to  
8       note, the presentation from tonight has been posted on our  
9       website. I would just make note of that.

10          MS. HOLLAND: That's right. The presentation's  
11       been posted. We'll have the recording of the entire  
12       hearing, that will also be posted on our website tomorrow.

13          I wanted to point out that if you have already  
14       submitted your comment earlier this past spring, you do  
15       not need to resubmit. We've got them and we will include  
16       them in the public record.

17          These are the ways that you can provide your  
18       comments after the hearing. You can submit or complete an  
19       online comment form, which is accessible on our project  
20       website at [495NorthernExtension.org](http://495NorthernExtension.org). You can send an  
21       email to [495NorthernExtension@VDOT](mailto:495NorthernExtension@VDOT). Please reference 495  
22       Express Lanes Project in the subject Line. You can mail  
23       your comment to VDOT's Northern Virginia District Office,

1 to the attention of Abi Lerner, the project manager, at  
2 4975 Alliance Drive, Fairfax, 22030.

3 You can call that number 703-691-6715 and  
4 provide your comment, it will be transcribed. You can  
5 also submit your comment video, by emailing us that video  
6 at the email address I've already mentioned.

7 Next slide.

8 We continue to have all of the information  
9 that was provided tonight, as well as the entire  
10 Environmental Assessment and the draft design plans  
11 available for public review on our project website. We  
12 have hard copies of this information and materials  
13 available at the following public locations:

14 VDOT's Northern Virginia District Office, and  
15 you need to call in advance if you'd like to come and view  
16 the materials; three local libraries, Dolly Madison, Great  
17 Falls and Tysons Pimmit; and the McLean Community Center.

18 Next slide.

19 And that's the last slide. That is the  
20 conclusion of our meeting this evening. We thank you all  
21 for joining. Have a great evening.

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(Whereupon, the recording ended)

CERTIFICATE OF TRANSCRIPTION

I, JUDY F. HENDERSON, do hereby certify that I produced this transcript from digital recordings provided to me, that the foregoing is a true record of the recordings received by me; that I am neither counsel for, related to, nor employed by any of the parties to the action in which these proceedings were held; and, further, that I am not a relative or employee of any attorney or counsel employed by the parties hereto, nor financially or otherwise interested in the outcome of the action.

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JUDY F. HENDERSON



VIRGINIA DEPARTMENT OF TRANSPORTATION

\* \* \* \* \*

495 EXPRESS LANES EXTENSION  
Location and Design Public Hearing

October 8, 2020  
McLean Community Center  
1234 Ingleside Avenue  
McLean, Virginia 22102  
4:00 p.m.

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P U B L I C C O M M E N T S

Comments by John Loria.

MR. LORIA: Well, I would like to reiterate some of the things that I said in meeting with Susan and some of the other folks on her team that the sound impact on the neighborhood north of Old Dominion and south of Georgetown Pike is -- it's much more impactful than I think they see from the numbers which came back via the receptors as they call them.

I would like that -- you know, I understand that this is very likely proceeding, but I would suggest that that entire neighborhood does need higher walls since they indicated to me that the walls will be the exact same height and these walls are only, I think they said 13 to 19 feet or something along that line.

But if at all possible, because of the future impact, a higher wall to reduce the noise decibels would be very appreciated by the entire neighborhood. As I mentioned to them when I was speaking with them directly, I think just across the board in general the decibel numbers need to be revisited and reduced and sound wall heights should be increased across the board, not just specific to my neighborhood.

1 THE COURT REPORTER: Thank you, sir.

2 \* \* \* \* \*

3 Comments by Junius Morgan

4 MR. MORGAN: Thank you for the opportunity  
5 to share a view point of the proposed I95 Express Lanes  
6 and the public path behind our community of Timberly  
7 South.

8 We first became aware of this project through  
9 the postcard received a couple of weeks ago. I received  
10 no other prior notification of the project.

11 The time required to fully review the chest  
12 of 20 documents in the Community Center hall would require  
13 months, not days. Notification of all the potentially  
14 affected parties has been minimal, due in some part to  
15 the timing of the COVID-19 virus and quarantines imposed  
16 thereby.

17 I have lived at my present location for more  
18 than 37 years, without the sound wall and with the sound  
19 wall and from an increase from six to 13 lanes east of my  
20 house. I am well acquainted with highway noise and the  
21 mitigation thereof.

22 Elevation of the sound wall. Based on our  
23 review of the 2025 map, there appears to be no plan for

1 an increase in the height of the sound wall sections  
2 backing the triangular parcels located west of the  
3 easement between Timberly Lane and Timberly Court and  
4 between Timberly Court and Huntmaster Lane.

5 The dips in the power easement represent  
6 approximate 50 foot declines in elevation at roughly 55  
7 yard intervals between high and low points in the  
8 easement.

9 A substantial amount of clean fill will be  
10 required to help level the walking path. Filling the dips  
11 in the terrain will raise the contour and ground level in  
12 those areas. Accordingly, a substantial increase in the  
13 height of the sound wall panels will be needed to properly  
14 follow the revised contour of the land.

15 Sound travels in a straight line from  
16 roadways. In the fall and winter months the roadway is  
17 especially visible from the rear of many properties that  
18 back those two triangular parcels. The existing sound  
19 wall height has been painfully inadequate to sufficiently  
20 mitigate noise pollution from I495 at these two points.  
21 Tree leaves are inadequate.

22 The only effective mitigants of traffic noise,  
23 to include engines and tires, not to mention sirens, are



1 distance and mass. An effectively higher sound wall  
2 remains the only viable option for noise mitigation for  
3 our community.

4 If the proposed path behind Timberly South is  
5 approved, we will have parking problems and traffic  
6 issues. The establishment of curb parking at the  
7 intersection of Lewinsville Road and Timberly Lane has  
8 heightened potential for accidents.

9 The Lewinsville Road Bridge over the beltway  
10 is an effective blind spot for traffic trying to enter  
11 Lewinsville Road from Timberly Lane. Cars coming down  
12 Lewinsville Road from the west and crossing the bridge  
13 from the east build up speed coming downgrade, making  
14 entry onto the Lewinsville Road from Timberly Lane already  
15 challenging.

16 Lewinsville Road is colloquially referred to  
17 as the Tysons Bypass. Additional challenges will result  
18 from curb side parking directly accessing Lewinsville  
19 Road.

20 Additionally, overflow from the proposed  
21 parking lot or parking area access to the public path  
22 will encourage parking along Timberly Lane and pose a  
23 nuisance and a hazard to residents. Accordingly we

1 request that a stoplight be considered at the intersection  
2 of Timberly Lane and Lewinsville Road.

3 Neighborhood security. By the placement of  
4 a paved public path behind the Timberly South subdivision,  
5 non residents with other than recreational objectives are  
6 being invited to peruse our community for vandalism and  
7 theft targets of opportunity.

8 As an affluent neighborhood, Timberly South  
9 presents an attractive target. Accordingly, we request  
10 that a chainlink security fence at least six feet high be  
11 installed along the entire perimeter of the Timberly South  
12 subdivision, thereby limiting access to the backs of  
13 approximately 35 Timberly South residences from the public  
14 path.

15 Construction of a public path behind the  
16 subdivision effectively takes away defacto protections  
17 afforded the community by the existing sound wall and the  
18 limitation of public access to the easement by Dominion  
19 Power.

20 In summary, our concerns regarding security,  
21 traffic hazards and noise abatement need to be factored  
22 into the planning process before it proceeds any further.

23 Thank you for your consideration of these

1 matters.

2 THE COURT REPORTER: Thank you, sir.

3 \* \* \* \* \*

4 Comments by Lg Chammas, Christina Kano and Mr. Satian who  
5 spoke as a group.

6 MR. CHAMMAS: We are concerned about the  
7 noise, losing the trees, security and --

8 MS. KANO: Property values.

9 MR. SATIAN: Value.

10 MR. CHAMMAS: And the value of course of the  
11 property. It's already sinking and we already start  
12 having new issues with the noise, with the helicopter  
13 flying over our head and airplane flying, we didn't have  
14 that in the past and how they want to compensate us for  
15 the trees that we have planted already and we have been  
16 planting for like 20 years planting trees.

17 For my concern myself, you know, when I bought  
18 the house, I put like double pane windows, I put like  
19 special siding to reduce the noise at the time we move,  
20 like 15, 17 years ago, 15 years probably, I forgot how  
21 many years. So how we going to fix this issue now? [sic]

22 And security if they want to make the trail  
23 next to it. So, you know, you would be sitting outside

1 on your porch or you are sitting on the deck and, you  
2 know, naked or I don't know what, whatever it is, you  
3 know, suddenly you see somebody -- no, it's true or not,  
4 you want to have your privacy, see what I mean.

5 So you are sitting there having your privacy  
6 outside, people like to dance and tan and stuff like this.  
7 So people walking or driving by or riding bikes or  
8 strolling, it doesn't -- it's shocking to see somebody in  
9 the back of your yard doing that. And maybe nice people  
10 will be riding bikes and walking and sometimes you see  
11 not nice people doing that and so we would be exposed to  
12 crime and vandalism or whatever it is, you know, sometime.

13 It's possible, you know, with extra traffic,  
14 and I remember Mr. Satian, he is one of the oldest tenant  
15 in our area and he -- when he brought his house, his land  
16 to build his house, he build it at end, you know, far away  
17 from the 495 so it will be -- because at the land close,  
18 the land closer to 495 were very cheap because of the  
19 security, people, you know, driving from 495 immediately  
20 to the houses near to the -- to the houses near to the 495  
21 and robbing and stealing. This is how it was back in the  
22 '60s, '70s. So he brought far away and so now he gonna  
23 have the same thing, same issue.



1 MR. SATIAN: That's true.

2 MR. CHAMMAS: So those are my concerns myself.

3 THE COURT REPORTER: Was there anything else  
4 you wanted to say?

5 MR. CHAMMAS: I think it's enough, I don't  
6 know.

7 MR. SATIAN: I'm at 6211 Portabello Road. The  
8 name is Satian and I'm very much concerned about the  
9 safety and security when you put the walkway in, that's A.

10 B, the height of the wall that they're going  
11 to build, I will be looking at a concrete wall, next to  
12 it they will put a pedestrian, bicycle trail. Definitely  
13 I would suggest to have heavy plantation trees, pine  
14 trees, what they called, that stays green year round,  
15 planted all along the trail and the most important is the  
16 value of my property that I'm concerned. That's it. And  
17 she is also out there.

18 THE COURT REPORTER: Did you want to make a  
19 statement also?

20 MS. KANO: Yes, I think they both summed it  
21 up, we kind of talked about it. I'm at 6927 Butternut.  
22 My number one concern is the property value and, you  
23 know, the resale. It's going to be very difficult.

1 There's going to be a lot of loss and how are we going  
2 to be compensated for that and if they would offer to buy  
3 the properties or whatever it is, but it's going to be a  
4 problem on the long term. So this is one issue I think.

5 This is -- I put everything in this house,  
6 this is all I have and it's major for me. This is my  
7 retirement plan and I have nothing else. So that's one.

8 Two, safety, that's my most important issue  
9 as well. I don't know what kind of measures we will have  
10 for safety with the trail. It could -- there are some  
11 pluses in that, you know, positive and negative sides to  
12 it. It would be great for the kids to hop on the trail  
13 and whatever, but it's not going anywhere from our side.

14 So if it's not going to be expanded towards  
15 the -- towards the Maryland side, if that's not approved  
16 yet, why clear it and why not finish it. Either clear  
17 and finish or don't clear and leave it as is and, you  
18 know, don't touch it now if we're waiting and the approval  
19 on the other side. So why mess up something on this side  
20 when continuation of it is not approved. So that's my  
21 second point.

22 So value, safety and resale. That's it.

23 MR. CHAMMAS: I would add those two things

1 to my comment as well, the value of the property will  
2 decrease much more than it is now, because really we are  
3 having problem now because the noise has increased since  
4 we moved in, and consequently the price is going down, so  
5 imagine now our having a big wall and we are having a  
6 bridge overlooking our house.

7 MS. KANO: So I think the bigger problem is  
8 like we have some beautiful homes in our neighborhood, a  
9 brand new \$3 million, whatever it is, it's been there for  
10 a while because it's very close to the wall, because you  
11 can see the wall.

12 So if that's going to be the case and our  
13 property will not sell, that's going to be an issue, you  
14 see what I mean? So it's literally facing - I mean it's  
15 a gorgeous gorgeous home. So if in the future we want to  
16 sell it and that becomes a problem for us to sell it,  
17 that's where my issue is.

18 MR. CHAMMAS: The first thing they tell you  
19 is the noise.

20 MR. SATIAN: All right. Are we done?

21 THE COURT REPORTER: Yes, sir, we're done.

22 Thank you.

23 MR. SATIAN: I want to add something, that

1 the highway is passing, the new highway coming from the  
2 beltway onto George Washington Parkway, it's high, very  
3 high, and the wall to be built should be at least to  
4 cover that so the cars, they just don't overlook the  
5 houses. The wall should be higher than the highway  
6 that's crossing, to cover the highway. Okay?

7 THE COURT REPORTER: Yes sir.

8 \* \* \* \* \*

9 Comment by Jung Lee

10 MR. LEE: My name is Jung Lee, I live in  
11 Northwyck Court which is right next to the toll exit on  
12 Spring Hill Road. I am against this particular project.

13 The major issue for me is that not having  
14 concrete agreement with the Maryland side of the road  
15 improvements, okay. Without having a concrete plan  
16 together between two states, for Virginia to proceed on  
17 our own is very dangerous consumption. We're going to  
18 spend all that money for nothing down the road if Maryland  
19 doesn't get their act together and get the road built.

20 So my suggestion is wait until we have an  
21 agreement with Maryland and both parties approve the plan  
22 and find the funding source to construct the additional  
23 Express Lane on our side and their side together. Once



1 that's done, then I think it will be a good plan to  
2 implement. Until that is done between Maryland and  
3 Virginia, I strongly object to the current plan that we  
4 have at Virginia side.

5 THE COURT REPORTER: Thank you, sir.

6 \* \* \* \* \*

7 Comments by George Carlyle

8 MR. CARLYLE: My name is George Carlyle,  
9 11501 Manorstone Lane, Columbia, Maryland. I support the  
10 managed lane extension that VDOT has created. I feel it  
11 has sufficient controls to ensure that it can be  
12 completed. I also feel that the engineering that was done  
13 years ago and was quite detailed is enough to ensure that  
14 this project will be successful.

15 THE COURT REPORTER: Thank you, sir.

16 \* \* \* \* \*

17 Comments by David Kuhn.

18 MR. KUHN: I would like to address two issues.  
19 The first is the noise and I'm worried about an increase  
20 in decibels from the 495 expansion.

21 Second, I'm excited about the potential trail,  
22 but I hope that it is contiguous all the way up to  
23 Georgetown Pike and bikable, but related to that I also

1 hope there is a plan to mitigate additional parking in  
2 neighborhoods that have not been impacted by this as yet  
3 built trail.

4 THE COURT REPORTER: Thank you, sir.

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10 (Whereupon, at approximately 8:00 o'clock,  
11 p.m., the comment period was concluded)

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## CERTIFICATE OF NOTARY PUBLIC

I, JUDY F. HENDERSON, the Verbatim Reporter before whom the foregoing comments were made, do hereby certify that the comments were taken by me stenographically and thereafter reduced to typewriting; and that I have no interest in said proceedings, financial or otherwise, nor through relationship with any of the parties in interest or their counsel.

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JUDY F. HENDERSON  
Verbatim Reporter

	I-495 NEXT	Public Comments and Responses (Non-Specific)		
	Version 1	1/11/2021		
	Theme	Comment/Question	Response	Source
5	Air Quality	This project should be evaluated for greenhouse gasses.	There are currently no explicit federal requirements pertaining to transportation project-related greenhouse gas (GHG) emissions, although a qualitative GHG assessment was completed in 2019 to help support an informed decision.	Public comment Aug-Oct
6	Air Quality	The EA did not address hazardous air pollutant (HAP) impacts.	The EPA's <i>Control of Hazardous Air Pollutants from Mobile Sources</i> lists hazardous air pollutants. A <i>quantitative</i> mobile source air toxic (MSAT) analysis was conducted in 2019 for the I-495 NEXT project to assess the potential air quality impacts of the project, document the findings of the analysis, and make the findings available for review by the public and decision-makers. The MSAT analysis can be found within the <i>Air Quality Technical Report</i> (February 2020) located on the project website.	Public comment Aug-Oct
7	Climate Change	Adding transit options on I-495 is critical to achieving the goals of Fairfax County's Tysons Urban Center Plan and the forthcoming Community-Wide Energy and Climate Action Plan (CECAP).	Chapter 1 of the EA presents the Purpose and Need for the study. The Purpose and Need sets the goals for the study and serves as the primary criteria in the alternatives screening process. The Purpose and Need was presented to the public and to partnering resource agencies early in the development of the study. The Purpose and Need led to the development of the Build Alternative that meets the goals of the study. These goals include reducing congestion, providing additional travel choice, and improving travel reliability. The Build Alternative, therefore, would result in a transit enhancement. Express Lanes provide a dedicated running way for buses (which is shared with HOV-3+ vehicles and toll paying vehicles). Buses and HOV-3+ vehicles do not have to pay for the use of the facility. Through the use of dynamic tolls, the operator has the ability to move buses at the desired speeds. With the provision of the dedicated running way, transit operators are able to run transit routes that provide a travel time advantage to potential passengers. This is a condition similar to the operation that may be provided with the implementation of a Bus Rapid Transit facility. The provision of fast and reliable transit service serves as an incentive for drivers to shift to transit rather than use their automobiles. As indicated in the November 30, 2020 letter from Secretary Valentine to the Chairman of the Fairfax County Board of Supervisors, the Commonwealth of Virginia is committed to provide dedicated, ongoing support for transit services along the corridor as part of the larger I-495 NEXT project.	Public comment through Aug 2020



	I-495 NEXT	Public Comments and Responses (Non-Specific)		
	Version 1	1/11/2021		
	Theme	Comment/Question	Response	Source
8	COVID-19	This project is not needed because traffic volumes have gone down with COVID-19.	The 2018 conditions evaluated in the study are representative of typical conditions in the corridor. The current traffic conditions associated with COVID-19 are anticipated to be temporary, as compared with the ultimate design year used to design the project, which is required to be a minimum of 20 years out. Moreover, the analysis of future conditions is based on 2025 and 2045 models. Daily traffic volumes across Northern Virginia have recovered on average to approximately 80% of pre-COVID-19 volumes, and VDOT traffic data for segments of I-495 shows that daily traffic volumes have recovered to nearly 90% of pre-COVID-19 volumes. Traffic volumes are anticipated to return to pre-COVID-19 levels by the time the project is constructed and operational. In order to understand the potential impacts of reduced traffic demand on the network and the proposed project, VDOT has conducted a sensitivity analysis of impacts to traffic forecast volumes and traffic operations under a conservative scenario where impacts of COVID-19 were long-lasting into the future horizon years, with reductions in traffic volumes.	Public comment through Aug 2020
9	COVID-19	Project studies should be postponed indefinitely due to COVID-19 because people aren't able to engage in the process.	VDOT has held three public meetings, two question and answer sessions for the general public, two public hearings, 23 meetings with elected officials, 109 meetings with stakeholders and agencies, 22 meetings with homeowners and business associations, and 22 one-on-one meetings with property owners. The Public Hearings held on October 5 and 8, 2020, provided both in-person, as well as virtual opportunities for the public to engage in the process. Prior to the Public Hearings, VDOT held two Public Information Meetings / Question-&-Answer Sessions virtually with the public. In addition, the materials have been available online and in hard copy in several locations since February 2020, and the project team has been available for questions and comments via phone throughout the planning and design process. VDOT has been proactive in its engagement with the public through meetings, as described above, with numerous local citizen groups and residential organizations. VDOT is continuing to meet with HOAs on a regular basis to provide updates and provide opportunities for additional input and dialogue. Additionally, VDOT is committed to continuing to engage with the community through the final design and construction phases. These public involvement opportunities exceed both FHWA and VDOT policy for this type of NEPA study.	Public comment through Aug 2020

	I-495 NEXT	Public Comments and Responses (Non-Specific)		
	Version 1	1/11/2021		
	Theme	Comment/Question	Response	Source
10	Design	Add more general purpose lanes instead of express lanes because express lanes are often underutilized.	<p>While an Express Lane may have the same physical capacity of a general purpose lane, Express Lanes have operationally higher capacities during peak periods, due to more harmonious travel times and fewer weaving areas with limited access points. Express Lane vehicular flows are also carefully monitored to maintain a guaranteed speed threshold for car poolers, van poolers, and transit vehicles. The resulting travel time reliability encourages HOV and transit usage in the Express Lanes, which moves more people through the corridor.</p> <p>Express Lanes also provide the ability to price the unused capacity through tolling of SOVs, which allows for more space to become available in the general purpose lanes. This reduces congestion and increases speed in the general purpose lanes compared to a condition where the Express Lanes were used only by HOVs.</p> <p>The addition of two general purpose lanes in each direction would not provide needed infrastructure to incentivize travel for HOV-3+ and transit vehicles. This would be detrimental to the goals of moving more people through the corridor and incentivizing multimodal options. The traffic volumes in the Express Lanes would be managed to allow for traffic to travel at free flow speeds (up to 65 miles per hour, and no lower than the minimum average of 45 miles per hour for Express Lanes required by FHWA).</p> <p>Chapter 1 of the EA presents the Purpose and Need for the study. The Purpose and Need sets the goals for the study and serves as the primary criteria in the alternatives screening process. These goals include reducing congestion, providing additional travel choice, and improving travel reliability. To meet this Purpose and Need, it was determined that the Build Alternative must include Express Lanes.</p>	Public comment through Aug 2020
11	Design	VDOT should provide access between the GWMP and the Express Lanes, but there should not be a connection from the Maryland Managed Lanes to the GWMP.	<p>VDOT's internal sensitivity analysis found that not including the access to and from the Maryland managed lanes system (proposed as a separate project) would result in increased congestion along GWMP westbound (outbound) due to the bottleneck for the existing ramp to northbound I-495 general purpose lanes. The proposed new ramp connection to northbound I-495 Express was found to relieve this congestion.</p> <p>GWMP provides direct access to major destinations in Virginia, including the CIA/FHWA headquarters in Langley, the Pentagon, Ronald Reagan Washington National Airport, and the major commercial areas within Arlington and Alexandria. For trips from Maryland or beyond, GWMP provides the most direct – or in some cases, the only – route to these destinations.</p>	Public comment through Aug 2020

	<b>I-495 NEXT</b>	<b>Public Comments and Responses (Non-Specific)</b>		
	Version 1	1/11/2021		
	<b>Theme</b>	<b>Comment/Question</b>	<b>Response</b>	<b>Source</b>
12	I-495 Traffic	What effect on traffic in the general purpose lanes is anticipated based on implementation of the Express Lanes?	As demonstrated by the analysis, northbound general purpose travel times on I-495 would worsen if Maryland does not build managed lanes across the American Legion Memorial Bridge (ALMB) as a separate project. The difference in the southbound general purpose travel time would be negligible (5:06 in the No Build scenario compared to 5:11 in the Build scenario). However, other benefits of the I-495 NEXT project would be recognized throughout the Virginia roadway network including an overall increase in person throughput resulting from additional capacity, and improved arterial operations resulting from a shift in travel demand off congested arterials. The I-495 NEXT project has independent utility regardless of the Maryland Managed Lane project; additional detail is provided in response 3 on the previous page.	Public comment through Aug 2020
13	I-495 Traffic	Drivers will no longer be able to access the I-495 Express Lanes immediately south of the Georgetown Pike interchange.	VDOT analyzed the feasibility of providing a slip ramp connection from the I-495 general purpose lanes to the Express Lanes immediately south of the Georgetown Pike interchange. The analysis indicates that the provision of this slip ramp would be detrimental to traffic operations and safety on I-495. Direct access from the Georgetown Pike interchange to the Express Lanes would not be provided as part of the proposed I-495 NEXT project. However, the proposed layout of the Georgetown Pike interchange has been designed not to preclude future ramp connections from the Georgetown Pike interchange to the Express Lanes.	Public comment through Aug 2020
14	I-495 Traffic	With limited land, widening will not always be an option. Consider using technology to increase capacity rather than widening.	The review of potential options included in the EA and Alternatives Technical Report indicates that the use of technology alone, would not meet the Purpose and Need. The level of congestion is such that technological enhancements would not be able to solve the existing and forecast traffic operations and safety problems. However, the EA does not preclude the use of such technology, and the project would incorporate technological enhancements to the project to help improve the effectiveness of the proposed improvements during construction and after the construction is completed.	Public comment Aug-Oct
15	I-495 Traffic	What scenarios for the I-495 NEXT project have been studied?	As documented in the Traffic Technical Report, the following scenarios for the I-495 NEXT project in Virginia were studied: <ul style="list-style-type: none"> <li>•2025 No-Build and Build – with Maryland’s I-495 project</li> <li>•2045 No-Build and Build – with Maryland’s I-495 project</li> </ul> In addition, the study team conducted a sensitivity analysis of the following scenarios: <ul style="list-style-type: none"> <li>•2025 No-Build and Build – prior to Maryland’s I-495 project</li> </ul>	General

	<b>I-495 NEXT</b>	<b>Public Comments and Responses (Non-Specific)</b>		
	Version 1	1/11/2021		
	<b>Theme</b>	<b>Comment/Question</b>	<b>Response</b>	<b>Source</b>
16	I-495 Traffic	Was the existing bottleneck at the American Legion Bridge considered in the traffic study?	The bottleneck at the American Legion Bridge was considered and included as part of the traffic study area for the Existing Conditions and 2025 Future Conditions – without Maryland’s separate I-495 project. Without Maryland’s separate I-495 project built, the I-495 NEXT project improvements would increase to 2,500 more people per hour in both directions combined, and would better accommodate future travel demand.	General
17	I-495 Traffic	What happens to traffic if neither Virginia nor Maryland build their respective projects?	If neither Virginia nor Maryland constructed either of the separate projects on I-495, traffic conditions are projected to worsen. Due to future changes in land use in the region, and anticipated growth in corresponding traffic, traffic conditions are anticipated to get worse over time. As a consequence, lengthier rush hours, slower speeds, longer delays, more severe congestion, and increasing cut-through traffic would be more pronounced than today.	General



	I-495 NEXT	Public Comments and Responses (Non-Specific)		
	Version 1	1/11/2021		
	Theme	Comment/Question	Response	Source
18	I-495 Traffic	What are the impacts and benefits to the Dulles Toll Road / I-495 interchange with the project? Does it address the traffic issues at the interchange?	<p>With the I-495 NEXT project, travel times along the Dulles Toll Road through the DTR/I-495 interchange would decrease in both the Phase I (2025) and Ultimate (2045) scenarios, as detailed in the I-495 NEXT Traffic and Transportation Technical Report. Phase I of the Project would construct continuous express lanes for the entirety of the Project’s approximately three mile length, from the vicinity of the Dulles Toll Road/Airport Access Road interchange in Tysons to the GWMP interchange. Phase II would construct improvements at the I-495 and Dulles Toll Road interchange, approximately five years after completion of Phase I – with construction of Phase II starting not earlier than 2029 and completion anticipated by 2034. Finally, the Ultimate Condition of the Project, to be completed no earlier than 2045, would include additional access ramps at the Dulles Toll Road interchange and Route 123/Dulles Connector Road interchange. Additional opportunities for public input at the later phases of the Project are planned by VDOT as part of the phased approach.</p> <ul style="list-style-type: none"> <li>• Travel times – Phase I (2025): In the AM peak period, travel times from west of Spring Hill to east of Route 123 (through the I-495 interchange) are anticipated to be reduced by approximately 1.5 minutes in the eastbound direction (2025 Build scenario compared with 2025 No Build scenario); travel times are similar between the 2025 Build scenario and 2025 No Build scenario in the westbound direction in the AM peak and in both travel directions in the PM peak.</li> <li>• Travel times – Ultimate (2045): Due to reduced queue spillback from the northbound I-495 lanes, travel times are anticipated to be reduced by approximately 5.5 minutes in the eastbound direction (2045 Build scenario compared with 2045 No Build scenario); again, travel times are similar between the 2045 Build scenario and 2045 No Build scenario in the westbound direction in the AM peak and in both travel directions in the PM peak.</li> <li>• Access – As part of Phase I, the I-495 NEXT project would provide new direct access from eastbound and westbound Dulles Toll Road to the northbound I-495 Express Lanes. As part of the Ultimate scenario, the project would also provide direct access from the southbound I-495 Express Lanes to eastbound Dulles Toll Road, and from the northbound and southbound I-495 general purpose lanes to the Dulles Airport Access Road. In addition, the Ultimate configuration would provide access from the eastbound Dulles Airport Access Road to the northbound and southbound I-495 Express Lanes.</li> </ul>	General

	I-495 NEXT	Public Comments and Responses (Non-Specific)		
	Version 1	1/11/2021		
	Theme	Comment/Question	Response	Source
19	I-495 Traffic	What are the impacts to other regional roadways in Fairfax County as a result of the project?	As documented in Chapter 2 of the EA, the impacts to other regional roadways were considered as part of the traffic forecast modeling. Overall, the project would reduce congestion on the interstate system, especially upstream on I-495 northbound. The project would also form a seamless network of managed lanes between the American Legion Bridge, the Dulles Toll Road Connector, and the I-66 Inside the Beltway Express Lanes. The traffic forecast models indicate that this connection would incentivize some drivers to use the I-495 Express Lanes / Dulles Toll Road Connector / I-66 Inside the Beltway Express Lanes to get to and from points east in Arlington and Washington DC, instead of using the George Washington Memorial Parkway as a result of travel time reliability.	General
20	I-495 Traffic	What other local or regional projects were included in the traffic study and how is the National Capital Region Constrained Long Range Plan considered in the traffic and environmental studies?	As documented in the <i>I-495 NEXT Traffic and Transportation Technical Report</i> , project capacity and interchange ramp projects along the Dulles Toll Road and Dulles Airport Access Road were included in the future traffic model networks, as well as proposed transportation projects in the Tysons area. The separate Maryland I-495 and I-270 projects were also included since they are included in the CLRP. The FHWA-approved methodology for traffic forecast modeling and VDOT policy requires that projects in the CLRP be included in the analysis. The projects included in the CLRP are developed by the local jurisdictions in coordination with the Metropolitan Washington Council of Governments (MWCOCG).	General

	I-495 NEXT	Public Comments and Responses (Non-Specific)		
	Version 1	1/11/2021		
	Theme	Comment/Question	Response	Source
21	I-495 Traffic	What are the traffic and other benefits of the Virginia 495 NEXT project?	<p>The traffic and other benefits of the proposed improvements are defined by how the Build Alternative meets the Purpose and Need for the study. Chapter 1 of the EA presents the Purpose and Need and the means by which the Build Alternative meets the Purpose and Need is discussed in Chapter 2 of the EA. In general, the benefits of the 495 NEXT project include the following:</p> <ul style="list-style-type: none"> <li>• Moves more people</li> <li>• Provides travel time savings</li> <li>• Offers a new travel choice</li> <li>• Reduces traffic on local roads</li> <li>• Opportunities for increased transit and HOV use</li> <li>• Improves safety for area travelers and local residents</li> <li>• Extends Express Lanes network in Northern Virginia</li> <li>• Replaces aging bridge infrastructure</li> <li>• Implements measures to minimize and mitigate environmental impacts</li> <li>• New and improved pedestrian and bike facilities, including a new shared-use path along I-495</li> </ul>	General
22	Impacts During Construction	What will be the impacts of the project during construction and what mitigation or strategies will be used to construction traffic impacts?	<p>Estimated impacts and potential mitigation strategies are documented under the respective resource sections of Chapter 3 in the EA and are also analyzed in the associated technical documents. Following an FHWA NEPA decision, more detailed design and permitting phases could further reduce impacts and/or commit to required mitigation strategies. During construction, traffic delays and congestion would likely increase due to narrowing of lanes, temporary or long-term lane closures, and detours. Maintenance of Traffic plans and a Transportation Management Plan would be developed later in the detailed engineering phases of the project. These plans would include measures to mitigate traffic impacts during construction, as well as recommended travel-demand management strategies. Temporary impacts to neighborhoods during construction would be mitigated where feasible, by minimizing noise impacts, maintaining access to neighborhoods, limiting construction vehicle traffic through local and neighborhood roads, and following VDOTs specifications for erosion and sediment control.</p>	General

	I-495 NEXT	Public Comments and Responses (Non-Specific)		
	Version 1	1/11/2021		
	Theme	Comment/Question	Response	Source
23	Maryland Partnership/ American Legion Bridge	This project shouldn't move forward until Maryland upgrades the ALMB. What are the benefits of Virginia's I-495 NEXT as a stand-alone project if Maryland's project is stalled or doesn't get built?	Chapter 1 of the EA documents the Purpose and Need for the study and the analysis included in the EA and supporting technical reports illustrate how the Build Alternative is needed and would benefit the study area prior to the construction of the Maryland project. These benefits to the Virginia study area roadway network include an overall increase in person throughput resulting from additional capacity, providing new travel choices, improved arterial operations resulting from a shift in travel demand off of congested arterials, travel time reductions in the southbound direction of I-495, improved safety on residential streets and the general purpose lanes, and a decrease in traffic delays on local and neighborhood roads, especially at intersections. Although VDOT has identified potential future operational degradation in the northbound General Purpose Lanes prior to the widening of the American Legion Bridge, VDOT is working on development and evaluation of a range of mitigation options to be put in place until the American Legion Bridge is widened. VDOT also continues to work in coordination with MDOT to move the American Legion Bridge widening forward as a separate project. It is anticipated that MDOT would enter into a separate agreement with a concessionaire team in 2021. Details on these benefits are in Chapters 2 and 3 of the EA, and in the <i>I-495 Traffic and Transportation Technical Report</i> .	Public comment through Aug 2020
24	Maryland Partnership/ American Legion Bridge	How will travel and tolling be coordinated between Virginia and Maryland?	Virginia and Maryland have been coordinating efforts to provide for a seamless, regional transportation network of managed lanes as announced by the two state Governors in November of 2021, under the "Capital Beltway Accord." MDOT recently recommended a Preferred Alternative for their separate I-495 project in Maryland which includes HOT-3 lanes (3 passenger high occupancy tolled lanes), which is consistent with VDOT's Express Lanes system. Coordination between Virginia and Maryland is ongoing and will remain focused on managing operational consistencies between the two highway systems. The two states are continuing to look into options for Virginia vehicles to exit the Express Lanes between Virginia and Maryland, and conversely to allow vehicles from Maryland to enter the system and use the lanes in Virginia. Following the FHWA NEPA decision, this coordination would continue and would inform the more detailed phases of design, construction, and operation of the proposed improvements.	Public comment through Aug 2020



	I-495 NEXT	Public Comments and Responses (Non-Specific)		
	Version 1	1/11/2021		
	Theme	Comment/Question	Response	Source
25	Maryland Partnership/ American Legion Bridge	If this project is built before the ALMB is widened, there will be more crashes.	The I-495 NEXT project would eliminate weaving movements and would construct geometric improvements to the I-495 general purpose lanes. Furthermore, the analysis indicates that as a result of the construction of the I-495 NEXT project, there would be a reduction in volumes traveling on the arterials. This reduction in volumes would result in improve safety conditions on the local streets. Therefore, these improvements would results in safety improvements in the corridor. More detail on the safety analysis is in Chapter 8 of the <i>I-495 Traffic and Transportation Technical Report</i> .	Public comment Aug-Oct
26	Natural Environment	How would this project impact Dead Run?	As documented in Chapter 3 of the EA and the associated <i>I-495 NEXT Natural Resources Technical Report</i> , Dead Run, while located within the larger study area, is not currently anticipated to be impacted as a result of VDOT's I-495 NEXT project. Initially, the project conservatively assumed potential construction associated with dynamic message signs in the vicinity of Dead Run, but since completion of the technical memos and EA, the design has changed to scale back the equipment and related construction in the area. Therefore, no temporary or indirect impacts are anticipated.	Public comment through Aug 2020
27	Natural Environment	The EA doesn't include all species noted to be observed by the public near I-495, such as nesting birds.	Section 3.15 and Section 3.16 of the EA discuss wildlife and threatened and endangered species, respectively. These sections, along with the associated <i>I-495 NEXT Natural Resources Technical Report</i> , present the species that have been observed and documented in databases maintained by the U.S. Fish and Wildlife Service, the Virginia Department of Wildlife Resources, and the Virginia Department of Conservation and Recreation. FHWA and VDOT rely on the data provided by these agencies to document the resources that fall under their respective purviews.	Public comment Aug-Oct

	I-495 NEXT	Public Comments and Responses (Non-Specific)		
	Version 1	1/11/2021		
	Theme	Comment/Question	Response	Source
28	Natural Environment	This project will remove trees and destroy wildlife habitat, which is important for animal passage and habitat.	Section 3.15 and Section 3.16 of the EA discuss wildlife and threatened and endangered species, respectively. These sections, along with the associated Natural Resources Technical Report present the species that have been observed in the study area and the potential impacts that the Build Alternative could have on these resources. Habitat that would be affected by the project is primarily edge habitat that has already been fragmented along the highway in the right-of-way, in interchange loops, and the area in the median. Culverts connecting streams under roadways offer limited passage, and the habitat fragments result in low quality edge habitat. Habitat in these areas also is typically poor quality due to access restrictions posed by the travel lanes. Increasing the width of the roadway corridor would not likely increase habitat fragmentation as forested land would not be newly separated from contiguous forest. Of the approximately 118 acres of forested land that would be impacted by the project, approximately 30 acres of that would be forested areas outside of existing VDOT right-of-way. It should also be noted that of the 30 acres of forest impacts outside the existing VDOT right-of-way, approximately 28.5 acres would be impacted in Phase I and approximately 1.5 acres would be impacted approximately 20 years after the construction of Phase I is complete as part of the Ultimate Condition. Following a NEPA decision by FHWA, more detailed phases of design would advance that would include a revegetation plan to identify replacement vegetation locations and types where feasible following construction. VDOT would also continue to minimize environmental impacts where feasible during the final design process.	Public comment Aug-Oct
29	Natural Environment	Will trees that are impacted be replaced as part of the project?	The project includes a revegetation program to replace trees lost due to the construction of the project where feasible following construction. In addition, VDOT has committed to providing a tree survey for impacted areas during the design and construction phase of the project, once more detailed plans are available. The tree survey would be used to further document tree impacts and to inform the revegetation plan.	Public comment through Aug 2020
30	NEPA Study	What is a NEPA study and how is it used in decision making for the project?	NEPA, which stands for the National Environmental Policy Act, requires federal agencies to assess the environmental effects of their proposed actions prior to making decisions. A NEPA study – in this case, an Environmental Assessment (EA) – was prepared for the I-495 NEXT project in compliance with federal law and regulations. The EA was prepared in order to allow the Federal Highway Administration and VDOT to study the proposed action in the Build Alternative and a No-Build Alternative, and to make informed decisions about the impacts of each alternative on the natural and man-made environment.	General

	<b>I-495 NEXT</b>	<b>Public Comments and Responses (Non-Specific)</b>		
	Version 1	1/11/2021		
	<b>Theme</b>	<b>Comment/Question</b>	<b>Response</b>	<b>Source</b>
31	NEPA Study	Why was an EA done instead of an EIS?	As noted on the Federal Highway Administration (FHWA) website, “An Environmental Impact Statement (EIS) is prepared for projects where it is known that the action will have a significant effect on the environment. An Environmental Assessment (EA) is prepared for actions in which the significance of the environmental impact is not clearly established.” For the I-495 NEXT project, an EA was prepared because the significance of the environmental impact was not known prior to project initiation. The National Environmental Policy Act (NEPA) process would be completed when FHWA issues a NEPA decision document. The EA was approved for public availability by the FHWA on February 24, 2020. Following the Public Hearing and receipt of public and agency comment, VDOT worked with FHWA to respond to substantive public comments and develop a Revised Environmental Assessment. Following that effort, VDOT would request a NEPA decision from FHWA. If the results of these efforts do not identify any significant impacts, VDOT would request a Finding of No Significant Impact (FONSI) from FHWA. The FONSI would document FHWA’s selected action and document the absence of significant impacts. The issuance of the FONSI would complete the study process. On the other hand, if significant impacts are identified, FHWA and VDOT would need to initiate an Environmental Impact Statement (EIS) to complete the environmental study process.	General

	I-495 NEXT	Public Comments and Responses (Non-Specific)		
	Version 1	1/11/2021		
	Theme	Comment/Question	Response	Source
32	NEPA Study	Why was only one Build alternative studied?	<p>VDOT, in coordination with FHWA, local governments, and stakeholders identified an alternative that would meet the project purpose and needs: reduce congestion, provide new travel choices, and improve travel reliability along I-495. The build alternative described in Section 2.2.2 of the Environmental Assessment (EA) was identified as the only reasonable alternative to advance based on the Purpose and Need for the study. For this alternative, VDOT considered a range of design options at several interchanges to meet the needs at those locations. The I-495 NEXT EA identified one build alternative in detail which is acceptable under FHWA’s Technical Advisory T 6640.8A Guidance for Preparing and Processing Environmental and Section 4(f) Documents (FHWA, 1987). These decisions were presented to state and federal permitting agencies through project-specific agency meetings and coordination as the study developed. The Advisory states that “An EA does not need to evaluate in detail all reasonable alternatives for the project and may be prepared for one or more build alternatives.” The single build alternative leaves ample flexibility for different designs to be considered when the project advances to permitting and more detailed phases of design following an FHWA NEPA decision.</p> <p>I-495 NEXT project has independent utility since it would provide a usable facility and be a reasonable expenditure of funds even if no additional transportation improvements in the area are made, including to the ALMB.</p>	General
33	NEPA Study	What studies were performed in support of the environmental studies for the project?	<p>In addition to the Environmental Assessment (EA) which summarizes the study results, the following detailed technical reports are available for review:</p> <ul style="list-style-type: none"> <li>•Air quality analysis</li> <li>•Alternative analysis</li> <li>•Hazardous materials analysis</li> <li>•Historic resources survey and evaluation</li> <li>•Indirect and cumulative effects analysis</li> <li>•Natural resources analysis</li> <li>•Noise analysis</li> <li>•Section 4(f)/Section 6(f) resources evaluation</li> <li>•Socioeconomic and land use analysis</li> <li>•Traffic and transportation analysis</li> </ul> <p>These studies were made available to agencies and the public with the EA.</p>	General



	I-495 NEXT	Public Comments and Responses (Non-Specific)		
	Version 1	1/11/2021		
	Theme	Comment/Question	Response	Source
34	NEPA Study	When will the environmental study be completed and what decisions will be made?	The environmental study process, also referred to as the National Environmental Policy Act (NEPA) process, would be completed when FHWA issues a NEPA decision document. The Environmental Assessment (EA) was approved for public availability by the Federal Highway Administration (FHWA) on February 24, 2020. Following the Public Hearing and receipt of public and agency comment, VDOT worked with FHWA to respond to substantive public comments and develop a Revised Environmental Assessment. Following that effort, VDOT would request a NEPA decision from FHWA. Presuming the results of these efforts do not identify any significant impacts, VDOT would anticipate requesting and receiving a Finding of No Significant Impact (FONSI) from FHWA. The FONSI would document FHWA's selected action and document the absence of significant impacts. The issuance of the FONSI would complete the NEPA process. Should significant impacts be identified, FHWA and VDOT would need to initiate an Environmental Impact Statement (EIS) to complete the environmental study process.	General
35	Noise	Where noise walls are being replaced, please do not place them closer to property owners than the existing walls.	As discussed in Chapter 3 of the EA, based on the preliminary noise wall analysis, some future noise walls are anticipated to be shifted from existing locations. As a result of the widening, some of the sound walls would need to be relocated to locations closer to the existing homes. However, VDOT has and would continue to refine the design to minimize the impacts to these properties.	Public comment through Aug 2020
36	Noise	What are plans to mitigate impact of increased traffic noise from the project?	As discussed in Chapter 3 of the EA, highway noise is mitigated with construction of a noise wall between the affected properties and the adjacent roadway. A noise wall is considered for construction if it is found to meet all the required criteria. VDOT performed a preliminary noise technical analysis (following the Federal Noise Regulations and State Noise Policy) to assess the preliminary potential impacts associated with road noise as a result of the project. An updated noise analysis would be completed during final design. Any property that is currently protected by a noise wall would have a noise wall in the future. The top of any new noise wall, if relocation of the wall is required, would be at least the same elevation as the existing noise wall. Additional detail on the noise study is in the <i>I-495 NEXT Noise Technical Report</i> .	Public comment through Aug 2020

	I-495 NEXT	Public Comments and Responses (Non-Specific)		
	Version 1	1/11/2021		
	Theme	Comment/Question	Response	Source
37	Noise	Where noise walls are being replaced, please increase their height to 30 feet.	The I-495 NEXT Noise Technical Report (February 2020) was prepared based on preliminary designs as of Fall 2019, which were consistent with designs used for other impact calculations summarized in the February 2020 EA. A final noise analysis would be conducted during the final design phase, which would incorporate any design revisions between the Fall 2019 preliminary design and the final design. Noise mitigation (“abatement”) is determined using a three-phased approach. Phase 1 is to determine if highway traffic abatement consideration is warranted for the affected receptors. Phase 2 is to determine if a noise abatement measure is feasible, which requires consideration of both acoustical conditions (that 50% or more of impacted receptors experience 5 dB(A) or more of insertion loss is feasible) and engineering conditions (it is possible to design and construct the abatement measure). Phase 3 is to determine if a noise abatement measure is reasonable by meeting three criteria: to reduce noise by at least 7 dB(A) of insertion loss for at least one impacted receptor, to have an approved cost based on a minimum value of 1,600 square feet per benefitted receptor, and for 50% or more of benefitted residents and owners who respond to the outreach questionnaire to favor the noise abatement measure. Based on VDOT’s <i>Highway Traffic Noise Impact Analysis Guidance Manual (2018)</i> , VDOT can fund noise abatement that meets these criteria.	General
38	Public Engagement	More technical public workshops are needed to help the public understand the plans and documents.	VDOT has held three public meetings, two question and answer sessions for the general public, two public hearings, 22 meetings with elected officials, 111 meetings with stakeholders and agencies, 22 meetings with homeowners and business associations, and 22 one-on-one meetings with property owners. The Public Hearings held on October 5 and 8, 2020, provided both in-person, as well as virtual opportunities for the public to engage in the process. Prior to the Public Hearings, VDOT held two Public Information Meetings / Question-&-Answer Sessions virtually with the public. In addition, the project materials have been available online and in hard copy in several locations since February 2020, and the project team has been available for questions and comments via phone throughout the planning and design process. VDOT has been proactive in its engagement with the public through meetings, as described above, with numerous local citizen groups and residential organizations. VDOT is continuing to meet with HOAs on a regular basis to provide updates and provide opportunities for additional input and dialogue. Additionally, VDOT is committed to continuing to engage with the community through the final design and construction phases. These public involvement opportunities exceed both FHWA and VDOT policy for this type of NEPA study.	Public comment through Aug 2020

	I-495 NEXT	Public Comments and Responses (Non-Specific)		
	Version 1	1/11/2021		
	Theme	Comment/Question	Response	Source
39	Public Engagement	How does the public hearing affect the decision-making for the environmental process?	The Public Hearing provides VDOT with an opportunity to present the results of the EA, discuss these results with the public, and seek public comment on the EA and associated analyses. Substantive comments received during the public comment period and at the public hearing will be addressed by VDOT before requesting a NEPA decision from FHWA. Both VDOT and FHWA must consider these comments to determine if additional analyses are required before such a request can be made and/or if the comments identify any impacts that have not been considered already in the EA.	General
40	Public Private Partnership	Why is VDOT using P3 Delivery? Why does this benefit the public?	Currently, the 495 NEXT Project is being developed as a Concessionaire Project Enhancement in accordance with the 495 Comprehensive Agreement signed between VDOT and Capital Beltway Express, LLC. The original scope of the Comprehensive Agreement developed under the framework of the Public-Private Transportation Act of 1995 ("PPTA") anticipates project enhancements and sets out the process to add enhancements to the project. This overarching framework benefits the public by satisfying public needs such as reducing congestion, providing additional travel choices, and improving travel reliability via timely and efficient development and operation of the facility. The estimated cost of the project, \$500 million, is disproportionate to the entire statewide budget of \$1.4 Billion (2020) available for transportation projects as part of the SMART SCALE process across the rest of the Commonwealth.	General
41	Public Private Partnership	Public roads and parkland will be given to a private company.	As with other Express Lane sections, the concessionaire (P3) would operate and maintain the Express Lanes, but would not own the roads or impacted land. VDOT would own all right-of-way. Any parkland that is required for the project, must be replaced in accordance with environmental requirements, and as approved by the National Park Service, and is part of the overall project cost.	Public comment through Aug 2020

	<b>I-495 NEXT</b>	<b>Public Comments and Responses (Non-Specific)</b>		
	Version 1	1/11/2021		
	<b>Theme</b>	<b>Comment/Question</b>	<b>Response</b>	<b>Source</b>
42	Public Private Partnership	What is Transurban's role on I-495 and with this project?	During the planning phase, Transurban, in close coordination with VDOT, has been developing preliminary design plans to support VDOT's technical studies for the proposed project. VDOT has performed the detailed technical studies to complete the Environmental Assessment as well as additional independent studies to support the design. The preliminary design helps to define the project footprint. Transurban's work includes geotechnical studies, surveys, preliminary design, drainage and stormwater design, and utility investigations. VDOT reviews and approves this work as it is developed. VDOT anticipates entering into an agreement with Transurban in 2021, following receipt and approval of a binding proposal from Transurban. If the proposal is acceptable to VDOT, Transurban would then be responsible for design, construction, finance, operations and maintenance of the Express Lanes. VDOT continues to be responsible for regulatory approvals, project oversight, and agency coordination.	Public comment through Aug 2020



	I-495 NEXT	Public Comments and Responses (Non-Specific)		
	Version 1	1/11/2021		
	Theme	Comment/Question	Response	Source
43	Purpose and Need	What is the purpose and need of the project and how do the proposed project elements address the purpose and need?	<p>Chapter 1 of the EA presents the Purpose and Need for the I-495 NEXT project. The Purpose and Need sets the goals for the study and serves as the primary criteria in the alternatives screening process. The Purpose and Need was presented to the public and to partnering resource agencies early in the development of the study. The Purpose and Need led to the development of the Build Alternative that meets the goals of the study.</p> <p>As presented in Chapter 1, the purpose of the project is to:</p> <ol style="list-style-type: none"> <li>1. Reduce congestion;</li> <li>2. Provide additional travel choices; and</li> <li>3. Improve travel reliability.</li> </ol> <p>As discussed in Chapter 2 of the EA, The Build Alternative addresses the Purpose and Need by:</p> <ol style="list-style-type: none"> <li>1. Reducing congestion - The proposed project is anticipated to reduce congestion compared with the Existing and 2045 No-Build scenarios in three ways by: optimizing traffic volumes and travel demand on I-495, improving traffic operations, and increasing the number of persons moved.</li> <li>2. Providing additional travel choices - The proposed Express Lanes provide an alternative travel option for transit buses, HOV vehicles and van pools, or those wishing to pay a toll, and these options are shown to be utilized when provided.</li> <li>3. Improving travel reliability - The proposed Express Lanes would offer consistent and predictable travel times for Express Lanes users including HOV motorists and transit buses.</li> </ol>	General

	I-495 NEXT	Public Comments and Responses (Non-Specific)		
	Version 1	1/11/2021		
	Theme	Comment/Question	Response	Source
44	Right-of-Way and Property Impacts	Right-of-way negotiations should include consideration of the cost property owners will have to replace landscaping and reduced property value from smaller yards, noise and vibration increases, and increased air pollution.	Following an FHWA NEPA decision, VDOT would advance with more detailed design phases that would include identifying and acquiring necessary right of way. In accordance with the VDOT Right of Way Manual (2016) and the Uniform Relocation Assistance and Real Property Policies Act of 1970, as amended, affected property owners would be fairly compensated for acquisition of their property (see Section 3.5.2 of the EA for information on anticipated property impacts). Right-of-way compensation is based on an appraisal to determine the value of what is being taken. The appraisal takes into consideration impacts to the affected properties including loss of vegetation, reduction in the size of the yards, and limitations on property usage (permanent easements) as well as the need to construct a fence to separate the trail from the residences. However, appraisals are based on market data and though these issues are considered, the market does not always support a value being placed on these issues.	Public comment through Aug 2020
45	Shared-Use Path	Reduce the width of the proposed trail to minimize impacts to trees and bushes that provide a visual buffer between houses and the existing noise walls.	The 10-foot minimum pavement width standard helps ensure the safety of pedestrians and bicyclist using the shared-use path.	Public comment through Aug 2020
46	Shared-Use Path	Request fence between homes and proposed trail for increased privacy and security.	Following an FHWA NEPA decision, options to separate the trail from the adjoining residences would be considered. Consistent with VDOT practice, these decisions would be discussed with the adjacent property owners during the right-of-way phase of the project.	Public comment through Aug 2020
47	Shared-Use Path	Why is the trail on the community side of the noise wall instead of being on the highway side?	The proposed trail is proposed on the community side of the noise wall rather than the highway side due to the safety benefits of further separating bicyclists and pedestrians from highway traffic. VDOT has and would continue to coordinate the alignment and design elements of the path with residents of the surrounding communities, pedestrian and bicycle trail advocacy groups and Fairfax County staff.	General

	I-495 NEXT	Public Comments and Responses (Non-Specific)		
	Version 1	1/11/2021		
	Theme	Comment/Question	Response	Source
48	Stormwater	Adequate stormwater retention is needed that does not increase hourly discharge into Scott's Run.	Currently, this segment of the I-495 corridor does not have stormwater management facilities. I-495 NEXT is required to comply with the administration, implementation, and enforcement of the Virginia Stormwater Management Act through permits issued by a Virginia Stormwater Management Program (VSMP) authority. The 495 NEXT Project would introduce stormwater management as an added benefit to provide the water quality and runoff control that this corridor needs. If right of way needs to be acquired, property owners would be properly compensated. Due to the need for ongoing maintenance, stormwater management facilities are generally not located on private property. The current stormwater management approach for Project NEXT satisfies meeting the requirements to the maximum extent practicable with the application of both onsite stormwater management facilities and nutrient credits. Using the proposed SWM approach, the conditions would be better with the project than they are today or would be in the future under the No-Build alternative.	Public comment through Aug 2020
49	Stormwater	Stormwater retention improvements are needed for existing roadways as well.	Stormwater BMPs for water quality and water quantity for the existing impervious area within the limits of disturbance are not required in accordance with I-495 NEXT's specific project requirements as outlined in 9VAC25-870. Runoff for the existing impervious surface is being addressed through VDOT's Municipal Separate Storm Sewer System (MS4). VDOT presented stormwater management (SWM) options to the Virginia Department of Environmental Quality (VDEQ) to provide a holistic view of impacts to the surrounding properties should the project meet County requirements. VDEQ agreed with VDOT's assessment that the impact to residences and loss of natural habitat were too great to follow more stringent regulations. This documentation has also been shared with Fairfax County. The current SWM approach for the I-495 NEXT project satisfies meeting the requirements to the maximum extent practicable with the application of both onsite SWM facilities and nutrient credits. This approach was confirmed after 18 months of coordination between VDEQ, VDOT and Fairfax County to identify a balanced solution.	Public comment Aug-Oct
50	Tolling	The Express Lanes should be free (or minimal cost) on weekends.	Tolling on weekends, as well as on weekdays, is used to cover the costs to privately finance, construct, operate and maintain the Express Lanes without public subsidies. Additionally, the tolls on the Express Lanes are used to manage the utilization of these lanes. The I-495 Express Lanes are part of a system of managed lanes in Northern Virginia. The dynamic tolls are used so vehicles within the facility can travel at speeds of at least 45 mph. Under the Express Lanes tolling system, Transurban sets tolls low enough to attract drivers to its facility and high enough to avoid reaching congested conditions which would preclude them from maintaining the required facility speed.	Public comment through Aug 2020

	<b>I-495 NEXT</b>	<b>Public Comments and Responses (Non-Specific)</b>		
	Version 1	1/11/2021		
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51	Transit	Add dedicated lanes for BRT and rail options as part of I-495 NEXT, such as future expansion of the Purple Line to Tysons Corner.	The Virginia Department of Rail and Public Transportation is conducting the I-495 American Legion Bridge Transit and TDM Study in coordination with the Maryland Department of Transportation's Maryland Transit Administration (MTA). The recommendations resulting from this study are aimed to work in concert with Virginia's proposed northern extension of the I-495 Express Lanes and Maryland's proposed managed lanes program for the American Legion Bridge, I-495, and I-270. Study updates are available at <a href="http://drpt.virginia.gov/transit/major-initiatives/i-495american-legion-bridge-transit-and-tdm-study/">http://drpt.virginia.gov/transit/major-initiatives/i-495american-legion-bridge-transit-and-tdm-study/</a> . As indicated in the November 30, 2020 letter from Secretary Valentine to the Chairman of the Fairfax County Board of Supervisors, the Commonwealth of Virginia is committed to provide dedicated, ongoing support for transit services along the corridor as part of the I-495 NEXT project. This commitment ensures that the I-495 NEXT project, together with the existing I-495 Express Lanes, provide multimodal solutions to move more people through the corridor.	Public comment through Aug 2020



## **Appendix G: Small Group and Agency Coordination Meetings**

Date	Meeting	Meeting Type
3/12/2018	I-495 NEXT Bike/Pedestrian Meeting	Stakeholders & Agencies
3/12/2018	Maryland Department of Transportation (MDOT)/Virginia Department of Transportation (VDOT) Managed Lanes Study	Stakeholders & Agencies
5/3/2018	Supervisor John Foust Briefing	Elected Officials
5/4/2018	MDOT/VDOT Coordination Meeting	Stakeholders & Agencies
6/7/2018	I-495 NEXT Stakeholder Technical Advisory Group (STAG) Meeting	Stakeholders & Agencies
6/11/2018	I-495 NEXT Public Information Meeting	Public Meeting
6/18/2018	MDOT/VDOT Coordination Meeting	Stakeholders & Agencies
7/11/2018	Interagency Working Group	Stakeholders & Agencies
7/26/2018	Meeting with Federal Highway Administration (FHWA)	Stakeholders & Agencies
7/30/2018	MDOT/VDOT Coordination Meeting	Stakeholders & Agencies
10/9/2018	MDOT/VDOT Coordination Meeting	Stakeholders & Agencies
10/9/2018	Bike/Pedestrian Pathways with Fairfax County Department of Transportation (FCDOT)	Stakeholders & Agencies
10/22/2018	I-495 NEXT STAG Meeting	Stakeholders & Agencies
10/25/2018	National Park Service (NPS) Coordination Meeting	Stakeholders & Agencies
11/7/2018	FCDOT Coordination Meeting	Stakeholders & Agencies
11/8/2018	McLean Chamber of Commerce Meeting	HOAs & Business Organizations
11/9/2018	FHWA Meeting	Stakeholders & Agencies
11/30/2018	Langley Swim & Tennis Club Meeting	HOAs & Business Organizations
12/6/2018	Partnering Meeting	Stakeholders & Agencies
1/30/2019	FCDOT Coordination Meeting	Stakeholders & Agencies
2/6/2019	MDOT/VDOT Coordination Meeting	Stakeholders & Agencies
2/12/2019	Fairfax County Board of Supervisors Transportation Committee (BTC) Meeting	Elected Officials
3/4/2019	Study Status Update	Stakeholders & Agencies
3/7/2019	Coordination Meeting with Maryland	Stakeholders & Agencies
3/21/2019	Supervisor John Foust Briefing	Elected Officials
4/4/2019	NPS Coordination Meeting	Stakeholders & Agencies
4/9/2019	FCPA Coordination Meeting	Stakeholders & Agencies
4/14/2019	FCDOT Coordination Meeting	Stakeholders & Agencies
4/17/2019	NPS Coordination Meeting	Stakeholders & Agencies
4/22/2019	NPS Coordination Meeting	Stakeholders & Agencies
4/23/2019	Langley Swim & Tennis Club Meeting	HOAs & Business Organizations
4/25/2019	Supervisor Foust Briefing	Elected Officials
4/29/2019	American Legion Memorial Bridge/I-495 with MDOT	Stakeholders & Agencies
5/9/2019	495 NEXT STAG Meeting	Stakeholders & Agencies
5/14/2019	I-495 NEXT/MDOT I-270 Managed Lanes Study - Technical Workshop	Stakeholders & Agencies

Date	Meeting	Meeting Type
5/14/2019	McLean Citizens Association (MCA) Meeting	HOAs & Business Organizations
5/14/2019	MDOT Coordination Meeting	Stakeholders & Agencies
5/20/2019	I-495 NEXT Public Information Meeting	Public Meeting
6/12/2019	NPS Coordination Meeting	Stakeholders & Agencies
6/20/2019	Meeting preparations with MDOT for NPS Meeting	Stakeholders & Agencies
6/24/2019	NPS Coordination Meeting	Stakeholders & Agencies
6/27/2019	Supervisor Linda Smyth Briefing	Elected Officials
7/1/2019	Fairfax County Park Authority (FCPA) Meeting	Stakeholders & Agencies
7/3/2019	Metropolitan Washington Airports Authority Meeting	Stakeholders & Agencies
7/12/2019	Meeting preparations with MDOT for NPS Meeting	Stakeholders & Agencies
7/31/2019	Dominion Energy Meeting	Stakeholders & Agencies
8/8/2019	Fairfax County Stormwater Management Meeting	Stakeholders & Agencies
8/19/2019	Meeting preparations with MDOT for NPS Meeting	Stakeholders & Agencies
8/21/2019	George Washington Memorial Parkway (GWMP) Interchange Meeting	Stakeholders & Agencies
9/12/2019	Traffic Analysis Meeting	Stakeholders & Agencies
9/20/2019	MDOT Coordination Meeting	Stakeholders & Agencies
9/27/2019	MDOT Coordination Meeting	Stakeholders & Agencies
10/3/2019	FHWA Coordination Meeting	Stakeholders & Agencies
10/10/2019	Dominion Energy Meeting	Stakeholders & Agencies
10/11/2019	Langley Swim & Tennis Club Meeting	HOAs & Business Organizations
10/16/2019	Virginia Department of Historic Resources Meeting	Stakeholders & Agencies
10/16/2019	FCDOT Coordination Meeting	Stakeholders & Agencies
10/18/2019	FHWA Meeting	Stakeholders & Agencies
10/21/2019	MDOT Coordination Meeting	Stakeholders & Agencies
10/30/2019	MDOT Coordination Meeting	Stakeholders & Agencies
11/1/2019	VDOT/MDOT Technical Workshop	Stakeholders & Agencies
11/6/2019	MDOT Coordination Meeting	Stakeholders & Agencies
12/12/2019	NPS Coordination Meeting	Stakeholders & Agencies
12/16/2019	Delivery Risk Workshop with MDOT	Stakeholders & Agencies
12/16/2019	NPS Coordination Meeting	Stakeholders & Agencies
12/20/2019	Dominion Energy Meeting	Stakeholders & Agencies
1/7/2020	FHWA Meeting	Stakeholders & Agencies
1/9/2020	Trails Meeting with Supervisor Foust	Elected Officials
1/10/2020	Fairfax County (FC) Drainage and Stormwater	Stakeholders & Agencies
1/10/2020	FC Drainage and Stormwater	Stakeholders & Agencies
1/10/2020	MDOT Signs Meeting	Stakeholders & Agencies
1/16/2020	Supervisor Foust Briefing and Chairman McKay	Elected Officials
1/21/2020	MDOT Coordination Meeting	Stakeholders & Agencies
1/23/2020	NPS Coordination Meeting	Stakeholders & Agencies

Date	Meeting	Meeting Type
2/3/2020	Delegate Murphy Briefing	Elected Officials
2/3/2020	Delegate Sullivan Briefing	Elected Officials
2/4/2020	BTC Meeting	Elected Officials
2/4/2020	Senator Kaine aide (Evan McWalters) Briefing	Elected Officials
2/6/2020	FCPA Interface Meeting	Stakeholders & Agencies
2/6/2020	NPS Coordination Meeting	Stakeholders & Agencies
2/10/2020	NEXT STAG Meeting	Stakeholders & Agencies
2/11/2020	MCA Meeting	HOAs & Business Organizations
2/14/2020	Virginia (VA)/Maryland (MD) Coordination Meeting on Noise	Stakeholders & Agencies
2/20/2020	Congresswoman Wexton Briefing	Elected Officials
2/26/2020	VDOT/MDOT Conference Call Regarding Public Hearing	Stakeholders & Agencies
2/28/2020	Property Owner Meeting	Property Owner
3/2/2020	Property Owner Meeting	Property Owner
3/3/2020	Property Owner Meeting	Property Owner
3/5/2020	VDOT/MDOT Coordination Interface Meeting	Stakeholders & Agencies
3/6/2020	Property Owner Meeting	Property Owner
3/10/2020	Langley Swim & Tennis Club Meeting	HOAs & Business Organizations
3/11/2020	Property Owner Meeting	Property Owner
3/12/2020	Supervisor Foust Briefing	Elected Officials
<del>3/12/2020</del>	Design Public Hearing – Postponed to October	Postponed Public Hearing
3/16/2020	VA-MD Traffic Coordination Meeting	Stakeholders & Agencies
3/23/2020	VA-MD Traffic Coordination Meeting	Stakeholders & Agencies
4/9/2020	Stream Restoration Conference Call	Stakeholders & Agencies
4/17/2020	Update with FHWA Conference Call	Stakeholders & Agencies
4/30/2020	I-495 Traffic Analysis and Interchange Justification Report	Stakeholders & Agencies
5/12/2020	Work Session to Discuss I-495 NEXT Design Exceptions and Design Waivers	Stakeholders & Agencies
5/26/2020	Department of Environmental Quality (DEQ) Meeting	Stakeholders & Agencies
6/3/2020	FHWA Coordination Meeting	Stakeholders & Agencies
6/8/2020	495 NEXT Replacement Land with FCPA	Stakeholders & Agencies
6/17/2020	Property Owner Teleconference	Property Owner
6/29/2020	Scotts Run Homeowners Association (HOA) Teleconference	HOAs & Business Organizations
6/30/2020	MDOT Coordination Meeting	Stakeholders & Agencies
7/1/2020	Property Owner Teleconference	Property Owner
7/13/2020	Property Owner Teleconference	Property Owner
7/16/2020	MDOT and Department of Rail and Public Transportation (DRPT) Coordination Meeting	Stakeholders & Agencies
8/4/2020	Drainage Coordination with FC and DEQ	Stakeholders & Agencies
8/18/2020	Property Owner Teleconference	Property Owner



Date	Meeting	Meeting Type
8/20/2020	FCPA Coordination Meeting	Stakeholders & Agencies
8/21/2020	Water Quality Meeting with FC and DEQ	Stakeholders & Agencies
8/26/2020	I-495 / GWMP Interchange Briefing with MDOT	Stakeholders & Agencies
8/27/2020	495 NEXT Public Hearing Planning Meeting with FCDOT	Stakeholders & Agencies
9/2/2020	I-495 NEXT Operationally Independent and Non-Concurrent Construction	Stakeholders & Agencies
9/9/2020	Timberly South HOA Teleconference	HOAs & Business Organizations
9/9/2020	I-495 NEXT Meeting with The Preserve at Scotts Run	HOAs & Business Organizations
9/10/2020	Supervisor Foust Briefing	Elected Officials
9/10/2020	Property Owner Teleconference	Property Owner
9/11/2020	Property Owner Teleconference	Property Owner
9/14/2020	Property Owner Teleconference	Property Owner
9/14/2020	NPS Coordination Meeting	Stakeholders & Agencies
9/16/2020	Property Owner Teleconference	Property Owner
9/17/2020	Senator Favola & Delegate Keam Briefing	Elected Officials
9/17/2020	Property Owner Teleconference	Property Owner
9/18/2020	Delegate Murphy Briefing	Elected Officials
9/18/2020	Property Owner Teleconference	Property Owner
9/18/2020	Property Owner Teleconference	Property Owner
9/21/2020	U.S. Senator Warner's Office Briefing	Elected Officials
9/24/2020	I-495 NEXT Public Hearing Practice Session	Stakeholders & Agencies
9/28/2020	Virtual Question & Answer Session	Q & A Session
9/30/2020	Virtual Question & Answer Session	Q & A Session
10/1/2020	Supervisor Palchik Briefing	Elected Officials
10/2/2020	Congresswoman Wexton Briefing	Elected Officials
10/2/2020	Property Owner Teleconference	Property Owner
10/5/2020	I-495 NEXT Virtual Public Hearing	Public Hearing
10/6/2020	Property Owner Teleconference	Property Owner
10/8/2020	I-495 NEXT In-Person Public Hearing	Public Hearing
10/13/2020	MCA Transportation Committee Meeting	HOAs & Business Organizations
10/15/2020	Supervisor Dahlia Palchik	Elected Officials
10/15/2020	Property Owner Teleconference	Property Owner
10/19/2020	Senator Favola, Delegate Murphy, Supervisor Foust	Elected Officials
10/19/2020	Water Quality and Transurban Commitments	Stakeholders & Agencies
11/6/2020	MDOT/VDOT Executive Meeting	Stakeholders & Agencies
11/10/2020	BTC Meeting	Stakeholders & Agencies
11/11/2020	Great Falls Citizens Association Meeting	HOAs & Business Organizations
11/12/2020	Northern Virginia Transportation Authority Meeting	Stakeholders & Agencies
11/16/2020	Meeting with Property Owner	Property Owner

<b>Date</b>	<b>Meeting</b>	<b>Meeting Type</b>
11/16/2020	FCDOT Coordination Meeting	Stakeholders & Agencies
11/16/2020	Public Meeting Practice with DRPT	Stakeholders & Agencies
11/18/2020	DRPT/VDOT Transportation Meeting - Public	Public Meeting
11/19/2020	Technical Meeting	Stakeholders & Agencies
11/20/2020	Meeting with Chairman McKay	Elected Officials
11/20/2020	Snow Lear HOA	HOAs & Business Organizations
11/23/2020	Meeting with Supervisor Fouts	Elected Officials
11/23/2020	Tyson's Partnership Briefing	HOAs & Business Organizations
11/30/2020	Langley Swim & Tennis Club Meeting	HOAs & Business Organizations
11/30/2020	MDOT/VDOT Executive Meeting	Stakeholders & Agencies
12/2/2020	Langley Oaks HOA Meeting	HOAs & Business Organizations
12/3/2020	Timberly South HOA Meeting	HOAs & Business Organizations
12/16/2020	Langley Swim & Tennis Club Meeting	HOAs & Business Organizations
12/22/2020	Langley Swim & Tennis Club Meeting	HOAs & Business Organizations
1/4/2021	McLean Hamlet HOA	HOAs & Business Organizations
1/15/2021	Outdoor Solutions USA Meeting	Stakeholders & Agencies
1/19/2021	NPS Meeting	Stakeholders & Agencies
1/20/2021	Impacted Property Owner Teleconference	Property Owner
1/21/2021	Langley Swim & Tennis Club Meeting	HOAs & Business Organizations
1/21/2021	Meeting with FHWA regarding COVID-19	Stakeholders & Agencies
1/22/2021	MDOT and DRPT Coordination Meeting	Stakeholders & Agencies
2/5/2021	FCPA Meeting	Stakeholders & Agencies
2/8/2021	Property Owner Teleconference	Property Owner
2/9/2021	MDOT Coordination Meeting	Stakeholders & Agencies
2/10/2021	Design Meeting	Stakeholders & Agencies
2/17/2021	Timberly South HOA Meeting	HOAs & Business Organizations
2/24/2021	I-495 NEXT Trail Terminus at Lewinsville Road Meeting	Stakeholders & Agencies
2/24/2021	Meeting with FCDOT	Stakeholders & Agencies
2/26/2021	MDOT Coordination	Stakeholders & Agencies
3/1/2021	Interchange Justification Report Meeting with FCDOT	Stakeholders & Agencies
3/2/2021	FCDOT Coordination Meeting	Stakeholders & Agencies
3/3/2021	Interchange Justification Report Meeting with FHWA	Stakeholders & Agencies
3/5/2021	Interchange Justification Report Meeting with FCDOT	Stakeholders & Agencies
3/5/2021	FCDOT Coordination Meeting	Stakeholders & Agencies

Date	Meeting	Meeting Type
3/8/2021	Design Meeting	Stakeholders & Agencies

BTC = Fairfax County Board of Supervisors Transportation Committee; DEQ = Department of Environmental Quality; FC = Fairfax County; FCDOT = Fairfax County Department of Transportation; FCPA = Fairfax County Park Authority; FHWA = Federal Highway Administration; GWMP = George Washington Memorial Parkway; HOA = Homeowners Association; MCA = McLean Citizens Association; MD = Maryland; MDOT = Maryland Department of Transportation; NPS = National Park Service; STAG = Stakeholders Technical Advisory Group; VA = Virginia; VDOT = Virginia Department of Transportation