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June 5, 2015

The Honorable Aubrey L. Layne, Jr.
Secretary of Transportation
1111 E. Broad Street, Room 3054
Richmond, Virginia 23219

Reference: Fairfax County Comments on I-66 Tier 2 Draft Environmental Assessment

Dear Secretary Layne:

On June 2, 2015, the Fairfax County Board of Supervisors approved the following comments regarding the Tier 2 I-66 Draft Environmental Assessment. As indicated in the Board's February 2015 letter, I-66 is critically important to Fairfax County. The County continues to support the Commonwealth's efforts to address multimodal mobility in the I-66 Corridor and to move the most people as efficiently as possible.

Decisions made in this Corridor Improvement Project will have a significant impact on the daily lives of Fairfax County citizens and others who work and visit Fairfax County. They will also significantly affect the ability to implement future improvements in the I-66 corridor. Since the County transmitted comments to you in February the Virginia Department of Transportation (VDOT) and the Virginia Department of Rail and Transportation (DRPT) have been working extensively towards addressing our concerns. Our compliments are extended for the extensive public outreach that has been provided, and the Board appreciates the additional design work that has reduced the right-of-way impacts that were initially presented at Public Information Meetings in January and February of this year.

With the release of the I-66 Tier 2 Draft Environmental Assessment on May 12, 2015, the County offers the following additional comments covering our earlier February comments as well as additional issues regarding the Tier 2 EA. More technical comments on the numerous reports and plan sheets will also be sent to VDOT by County staff before the end of the comment period.

- Right-of-Way
 - The Board appreciates the additional considerations given to minimizing right-of-way impacts to our residences, businesses, parks, schools and natural resources. Some of these reductions are based upon new designs and applications of stormwater management regulations. The County continues to be interested in reducing the right-of-way impacts. The County encourages additional efforts to minimize, if not eliminate residential relocations. The County also requests that possible right-of-way reductions be considered at all crossings, as is being done with the phased reconstruction for the Cedar Lane crossing, and that reasonable design waivers be considered.
- Not to Preclude Extension of Rail Service
 - The Board supports the use of Typical Section 2A between the interchanges for the I-66 Transportation Improvement project. This will provide a wider median to accommodate a possible extension of Metrorail. The County understands that reconstructed interchanges will be designed and built to accommodate the future extension of Metrorail. However, in some

cases, most notably at the Monument Drive and Stringfellow Road crossings, a significant up-front cost savings can be achieved by using the existing structures and their HOV ramp connections until such time as a Metrorail extension is implemented. Alternative concept designs have been developed for building the more expensive configurations which would accommodate an extension of Metrorail service as part of this project. The more extensive designs would relocate the ramps to the north, and in Monument Drive's concept, shift the crossing to the west. Option 2A at Monument Drive will need to be redesigned to eliminate the encroachment on the County's property where the Public Safety Building is currently under construction. The County requests that the additional right-of-way needed, if any, for these ramp relocations and bridge relocations be acquired as part of this project, so as to not preclude the future extension of Metrorail through these locations or make them cost prohibitive in the future.

- Key Network Assumptions

- As noted previously, there are a number of transportation network assumptions that are important to the conversion of a multimodal I-66 within the highway system serving the central part of Fairfax County. Some of these may be built at a later time period than the 'managed lanes' project on I-66; however, it is important to preserve the opportunity and not preclude the ability to build the following in the future. We are pleased that the Project Team has examined several options for the High Occupancy Vehicle (HOV) connection between I-66 and the Fairfax County Parkway, in particular, and that future HOV connection is not being precluded. The County continues to encourage the consideration of these future projects included on Fairfax County's Comprehensive Plan in the design process:
 - HOV lanes along Route 28 north of I-66,
 - HOV lanes along the Fairfax County Parkway,
 - Interconnections with I-66, and
 - Additional southbound lane along Beltway from Route 7 in Tysons to I-66.

- Enhanced Transit

- A clear advantage of the managed lanes is that they support more reliable and more efficient bus service in the corridor, and, therefore, facilitate moving more people in fewer vehicles. As part of the I-66 Corridor Improvement Project, a preliminary proposed new transit service plan has been put forward. Refinements to the transit service plans are likely needed and comments will be detailed in the separate document from County staff.

- Bike/Pedestrian Facilities

- Since transmitting our earlier comments in February, the I-66 Transportation Improvement Project Team has been working with the County regarding elements of Bike/Pedestrian Facilities:

- Crossings of I-66 –

We are pleased that VDOT is including bike and pedestrian facilities on the bridges it is rebuilding with this project. Although the Blake Lane Bridge is not expected to be rebuilt, the County continues to recommend that enhancements regarding bike/pedestrian applications for Blake Lane be included within this I-66 Corridor Improvement Project. It is also recommended

that the enhancements at the crossings be connected with the existing bike/pedestrian networks adjacent to the crossings. The proposed shared use path at the Route 123 interchange redesign dead-ends north of the interchange and does not connect with any existing bike/pedestrian network. The shared use path should be extended to connect to a logical terminus on the north side of I-66, either adjacent to Route 123, or connecting to the I-66 Parallel Trail System along Rosehaven Street. All existing pedestrian connections across I-66 should be maintained during construction or a reasonable interim alternative should be provided.

- **Parallel I-66 Regional Trail -**

This project presents a unique opportunity to provide county residents with a major regional trail paralleling I-66, which would be a tremendous community amenity, serving both commuting and recreational bicyclists, as well as pedestrians. The Project Team has spent a significant amount of time on this issue; however, the identification and supporting documentation of a regional trail alongside of I-66 is very preliminary and needs additional input before the revised EA and Preferred Alternative are finalized. The regional trail should be part of this Project fulfilling a key element of the multimodal character of the facility. The construction costs of the regional trail, including on-street sections (signage, striping, etc.) should also be included in the total Project costs. Due to the significant concerns that have been raised regarding the parallel trail, the Board requests that VDOT continue to work closely with the County to determine a reasonable alignment. .

- **Traffic Impact Area Analyses**

- As part of the implementation of the Capital Beltway Express Lanes, a limited analysis of adjacent congested intersections was conducted. However, these efforts only minimally considered the nearby impacts of the new facilities on intersections near the Beltway and the related traffic congestion. It is recommended that prior to the implementation of a multimodal design along I-66, that cross-street traffic congestion resulting from this project be addressed within the nearby interconnecting roadway system within a quarter-mile of the I-66 corridor.

- **Implementation Issues**

- Since the transmittal of the Board's February letter the TMP process has begun and considers four categories and working groups: Transit/TDM, Traffic Operations; Communications and Outreach; and Traffic Engineering. These efforts are expected to provide substantial opportunity for input and consideration for the implementation of the I-66 project. We emphasize that these efforts continue and the following considerations be included:
 - Ensuring that sound walls are replaced rapidly after the existing wall are removed
 - Minimizing park impacts
 - Developing an aggressive maintenance of traffic plan for roadway and existing Metrorail service
 - Minimizing night construction in areas adjacent to residential neighborhoods and using equipment that minimizes noise impacts
 - Maintaining proper erosion, siltation and stormwater management equipment and facilities during construction
 - Developing an effective landscaping and tree replacement plan – see attachment
 - Minimizing disruption during construction
 - Minimizing construction that impacts bus services especially at peak times
 - Maintaining pedestrian access to Metrorail stations

- Environmental Issues

- There are a number of environmental issues that have been reviewed in the Draft Tier 2 EA but limited information related to the issues necessitates continuing coordination on these issues leading up to the Design Public Hearings. Additional information that is desired by the County will be summarized and sent by County staff in more detailed technical comments by the June 18, 2015 deadline. As the Project Team proceeds to the design phase of the project, the County considers the following of significant concern:

- stormwater management strategies
- heights of noise barriers,
- tree cover
- impacts to Resource Protection Areas,
- Environmental Quality Corridors,
- Watershed Management Plans,
- impacts to Parks, and
- impacts to Historic Properties and wildlife habitat.

Comments from the Fairfax County Park Authority (FCPA) and the Department of Planning and Zoning (DPZ) containing more detailed comments regarding some of these issues are included, as Attachments A and B to this letter.

Additional Review Comments Regarding the Draft Environmental Assessment, Tier 2 EA

- Need for adequate time for County to coordinate with VDOT on Revised EA of Preferred Alternative

The 'mix and match' features of the Tier 2 EA which include alternate typical sections, interchange concepts and access points to/from the proposed managed lanes, the considerations and responses to review comments received by FHWA, VDOT and DRPT, and the incomplete documentation of bike/pedestrian elements, necessitate continued coordination between VDOT and the County in the preparation of the Revised EA of the Preferred Alternative. This project has been progressing at a rapid pace. A voluminous amount of materials has been produced for these public hearings. Some design options were produced after the original public hearing materials were published. It is difficult for the public and local officials to absorb this quantity of information in such a short time. Fairfax County requests that adequate time be made available for County officials to work together with VDOT to evaluate the new alternative and analyses in developing the Final Environmental Document. In addition, an appropriate public forum should be scheduled to allow the public to also understand any new alternatives and be able to comment on them, before a final recommendation is agreed upon.

- Development of a strategy to coordinate implementation of improvements Inside and Outside the Beltway

The County is participating in both the I-66 Inside the Beltway and I-66 Outside the Beltway projects. They are following different schedules but have very important continuity and connectivity issues. There are major efforts underway for each project and they both come under the heading of 'Transform66'. However, an overall strategic plan for blending the implementation of elements from each has not been developed. The County requests that a Transform66 Strategic Plan be developed to assist with issues such as the conversion from HOV-2 to HOV-3, managed lane and tolling coordination, multimodal

applications and directional signage for the larger Corridor providing implementation continuity between both project segments.

- Heights of Elevated Ramps
 - Some flyover and interchange ramps along the project have been designed in this Tier 2 EA 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 general purpose lanes to westbound I-66.
- Flexibility in Final Design
 - The Board recognizes that the design concepts presented in the EA represent preliminary designs. Regardless of whether the selected procurement process is a public-private partnership or a design-build process, the need exists to allow creativity in the final design to reduce costs, simplify maneuverability of systems, and further reduce impacts on the community.

Project Funding Considerations

The subject of the NEPA public hearings and the purpose of these comments is to address the design options presented, including all the supporting analytical material. Selecting a financing mechanism for the project is not directly related to the design options presented in the public hearings. However, to obtain a Record of Decision, funding must be in place for the next phase of the project. Moreover, in the Citizen Information Meetings held in January 2015, VDOT presented that this project would be constructed as a Public-Private Partnership, similar to the I-495 Capital Beltway and I-95 Express Lanes. Project officials stated that approximately \$1 billion of the total capital investment could be expected to come from the private sector partner. On May 19, 2015, Secretary Layne presented initial results of the Commonwealth's analysis of procurement options for the I-66 project to the Commonwealth Transportation Board (CTB). According to the analysis, a design-build option, rather than a P3 procurement, could result in additional \$500 million to \$1.1 billion in savings and toll revenues, which could be reinvested in the transportation system. The County would like to see the full analysis supporting the May 19 report to the CTB and any subsequent financial analyses prepared to assist with the selection of a procurement method. The County looks forward to reviewing these financial assumptions and recommendations on the procurement method when presented to the Transportation Public-Private Partnership Advisory Committee in July and prior to the CTB making a final decision.

Using a design-build procurement option could address a number of County concerns, several of which were noted in the county's February 2015 letter. Concerns that might be addressed by the design-build option are noted below:

One of the County concerns is that this project not place any impediments, physical or financial, in the way of a future extension of Metrorail. In the February letter, the county requested that flexibility be provided in the private partner agreement to allow the extension of Metrorail before the concession term expired, and to draft any "non-compete" language in the agreement carefully. Under a design-build option, this would likely not be an issue.

Enhanced transit on the managed lanes is an integral aspect of this project. In the February letter, the Board noted the importance of a funding plan for the transit service being promoted as part of the project. The letter stated: "We would encourage the Commonwealth to incorporate mechanisms that allow project revenues to help fund the enhanced transit services for the corridor." Based on the Commonwealth's assessment that a design-

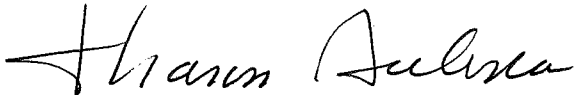
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build option could generate \$200 million to \$500 million in excess revenues, it would appear that a design-build option could be a promising mechanism for funding enhanced transit in the corridor, including costs of transit capital purchases and operations and maintenance.

Fairfax County appreciates the work that has been undertaken to date in this study 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 Robert Kuhns of the Department of Transportation at Robert.kuhns@fairfaxcounty.gov or 703-877-5600.

Sincerely,

A handwritten signature in black ink, appearing to read "Sharon Bulova". The signature is fluid and cursive, with the first name "Sharon" being more prominent than the last name "Bulova".

Sharon Bulova
Chairman

cc: Members, Fairfax County Board of Supervisors
Edward L. Long Jr., County Executive
Robert A. Stalzer, Deputy County Executive
Catherine A. Chianese, Assistant County Executive
Tom Biesiadny, Director, Department of Transportation
Helen Cuervo, District Administrator, VDOT, Northern Virginia
Renee Hamilton, Deputy District Administrator, VDOT, Northern Virginia
Susan Shaw, Megaprojects Director, VDOT
Young Ho Chang, Project Manager
Fred R. Selden, Director, Department of Planning & Zoning
Kirk W. Kincannon, Director, Fairfax County Park Authority



FAIRFAX COUNTY PARK AUTHORITY

MEMORANDUM

TO: Leonard Wolfenstein, Chief
Transportation Planning Division
Fairfax County Department of Transportation

FROM: Sandy Stallman, Manager
Park Planning Branch, PDD
Fairfax County Park Authority

DATE: May 20, 2015

SUBJECT: Route I-66 Tier 2 Draft EA – May 2015
Tax Map(s): All adjacent parcels to Route 66 Corridor

Thank you for including the Park Authority in the review of the Tier 2 Draft Environmental Assessment for I-66. This document states that the proposed construction would consist of building an additional (HOV) lane with additional entrance lanes and park and ride lots (page 3-1). The Draft Environmental Assessment identifies three Fairfax County Park Authority parks adjacent to Interstate 66 that would be impacted by one or more of the proposed concepts: Cub Run Stream Valley, Ellanor C Lawrence, and Random Hills, Congressman Gerry Connolly Cross County Trail (GCCCT), as well as Northern Virginia Regional Park Authority's (NVRPA) Washington & Old Dominion (WO&D) Trail. The plan sets for the three concepts shows the project limits extending to the ROW / Property lines adjacent to Bull Run Regional Park, Briarwood Park, Random Hills Park, Cub Run Stream Valley Park, and Rocky Run Stream Valley Park. Additional parks within the study area that could potentially be impacted if the project area were expanded to accommodate engineering, grading, staging, stormwater, or expanded construction requirements, include Arrowhead, East Blake Lane, Lane's Mill, Center Ridge North, Idylwood, Heartland Green, and Long Branch Stream Valley Park all of which contain sensitive environmental and cultural features.

The Fairfax County Park Authority staff has reviewed the above referenced plan and provides the following comments:

1. Any or all of these parks could experience direct impacts of lost parkland, recreation facilities, vegetation, and habitat, 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.
2. The I-66 corridor was subjected to cultural resources review which indicates that the corridor contains numerous Native American, historical, and Civil War sites, with a high potential to contain additional sites. Since this project requires Federal permitting and funding it triggers Section 106, requiring VDOT to consult with VDHR by Federal Regulation. Since VDOT has already performed a Phase I archaeological survey, staff

recommends a Phase II study followed by avoidance or Phase III data recovery on all significant sites found during Phase I surveying or that previously exist in the study corridor or areas of impact.

3. The Park Authority has reviewed the Phase I report entitled, "*Phase I Archaeological Survey of the Interstate 66 Corridor Improvements for the Tier 2 Environmental Assessment From US 15 in Prince William County to Interstate 495 in Fairfax County, Virginia.*" Staff concurs with most of the report's findings, including the two sites found eligible for inclusion onto the National Register of Historic Places.

However, this report by Dove Tail neglected to describe site 44FX1556, and neglected to record a civil war earth work located just north of Braddock Road and west of Route 28, directly adjacent to the current right of way. Thus was not listed or considered in the Tier 2 Draft Environmental Assessment for I-66. This earthwork is significant, being roughly 300 feet (north to south) by approximately 475 feet (east to west) and was likely part of Joseph Johnson's 1861 fortification of Centreville. Little remains of these fortifications, so it should be avoided by construction, its preservation would be an important cultural resource for Fairfax County. Staff requests that this oversight be corrected in the *Phase I Archaeological Survey of the Interstate 66 Corridor Improvements for the Tier 2 Environmental Assessment From US 15 in Prince William County to Interstate 495 in Fairfax County, Virginia* as well as the *Tier 2 Draft Environmental Assessment for I-66*.

4. Under section 4.8 Historic Properties on page 4-45, the Draft Environmental Assessment states "Finally, a survey to locate and document the boundaries and any previously undocumented battlefield features of all Civil War battlefields defined by the American Battlefield Protection Program (ABPP) was conducted within the APE for the project. The APE for potential visual effects to battlefields is 500 feet on either side of the VDOT right of way. Each battlefield in the APE was assessed based on the Potential National Register (PotNR) boundaries as defined by the ABPP." However, the known and documented major Civil War earthwork mentioned in comment #3 above, was not listed. Staff requests that it be added to this section.
5. The Draft Environmental Assessment states that right-of-way expansion with takings will be necessary from Ellanor C. Lawrence Park in Figure 4-1 on page 4-17, and page 4-18. Page 4-42 of the Draft Environmental Assessment lists Ellanor C. Lawrence Park as a 4f site that will have permanent takings and impacts, while pages 4-43 to 4-44 also lists the park under section 6f Land and Water Conservation Fund lands, for which "Alternative 2A and Alternative 2B would both require direct and permanent use of land from one Section 6(f) resource, Ellanor C. Lawrence Park. If the Section 6(f) resource is impacted ... suitable land replacement will be identified, acquired, and conveyed in coordination with the park owner(s), the Virginia Department of Conservation (VDCR), and DOI." Additionally, page 20 of the Draft Section 4(f) Evaluation describes the impacts to Ellanor C. Lawrence Park from Alternative 2A would be approximately 2.7 acres of land. This section then states that Alternative 2B would require approximately 3.6 acres of land from Ellanor C. Lawrence Park. This same section then states that Alternative 2C (which is only another variation for the I-66/28 interchange that can be used with 2A or 2B) would provide "a more compact three-level interchange" that "would not use land from

Ellanor C. Lawrence Park”. Page 32 of the Draft Section 4(f) Evaluation also states that “Alternative 2C would avoid use of land from Ellanor C. Lawrence Park.” However, the plan sets clearly shows that for all three alternatives, including 2C, the project limits extending onto Ellanor C. Lawrence Park along Route 28, with ROW / property takings to make room for this interchange. Staff requests that pages 4-44 of the Draft Environmental Assessment and pages 20 and 32 of the Draft Section 4(f) Evaluation be corrected to include the impacts and parkland necessary for “Alternative 2C” be shown on the plan set.

6. As stated on page 20 of Draft Section 4(f) Evaluation, mitigation for use of parkland would include conveyance to the Fairfax County Park Authority of excess right of way (up to approximately 3.8 acres) in the vicinity of Braddock Road west of the current at-grade intersection of Braddock Road and VA 28. Additionally, reforestation of the existing entrance location could be undertaken. Because Land and Water Conservation Funds were used for this park, Section 6(f) of the Land and Water Conservation Act also would apply. Coordination would need to be carried out with the Fairfax County Park Authority, the Virginia Department of Conservation and Recreation, and DOI to approve any conversions and the suitability of substitute lands that would be necessary to offset the conversion.” This “excess right of way in the vicinity of Braddock Road west of the current at-grade intersection of Braddock Road and VA 28” should include the entirety of the Civil War earthworks located in this section, described above in comment #3.
7. Pages 26-28 of the Draft Section 4(f) Evaluation, Figure 16, does not reflect the concurrently proposed design for a new entrance to the Ellanor C. Lawrence Park ballfields from the north, which is shown in Figure 17. However, it is not clear whether the new park entrance road (shown in white in Figure 17) will be a park road or a VDOT road. It is being constructed to accommodate this project on Rt. 28 and I-66, but is also being described as a park road to reduce legal conflicts. If VDOT is going to maintain the new entrance road, should right-of-way be officially granted? Please clarify on all documents the intended ownership and maintenance of the replacement park entrance road.
8. While Figure 4-1, on page 4-21 of the Draft Environmental Assessment shows a potential impact to Random Hills Park, page 4-43 lists Random Hills Park as a 4(f) site that will have permanent takings and impacts, as do pages 15 & 20 of the Draft Section 4(f) Evaluation, stating that Alternative 2A would use approximately 0.03 acres of land from Random Hills Park. This plan set also shows this proposed ROW taking. Please update page 4-21 to be consistent with the conditions shown on page 4-43, the Draft Section 4(f) Evaluation, and plan set.
9. Page 4-43 of the Draft Environmental Assessment lists the Congressman Gerry Connolly Cross County Trail (GCCCT) as being impacted under Section 4(f) review. Potential impacts to Northern Virginia Regional Park Authority’s Washington and Old Dominion Trail (W & OD) are listed in Figure 4-1 on page 4-25. Page 4-43 states that the trail will be impacted under 4(f), while pages 4-45 to 4-46 list it as a Determined Eligible Architectural Resources. The plan sets for both Concept 2A and 2B show the project

limits extending onto W & OD with ROW / property takings. More information provided at time of engineering will be needed to effectively evaluate these impacts.

10. While pages 3-12 to 3-14 discuss pedestrian and bicycle enhancements related to the I-66 project being planned by the end of 2015, comprehensive data on the extent of these enhancements is not provided. Other pedestrian and park trails will also be impacted and should be strategically reviewed as an alternative transportation mode in consideration of future improvements since they provide important connectivity for commuting and recreation. Pedestrian crossings, over, under, or along the Route 66 corridor should be consistent with the adopted Countywide Trail Plan (CWTP) and Bicycle Master Plan. The W & OD Trail is a major regional trail that supports non-vehicle commuters and is located just beyond the project limits inside the Beltway. However, connections to this major trail system within the project area should be evaluated. Other planned and existing trail networks to be evaluated for potential connectivity include the Sully Woodlands Trail Plan (SWTP) and Gerry Connolly Cross County Trail (GCCCT). Pedestrian connections and I-66 overpasses to be considered that will support connectivity to these major trail systems include the following:
 - Route 123- The Route 123 overpass for Route 66 needs to accommodate pedestrians (CWTP, CCT upgrade route).
 - The Jermantown Road overpass for I-66 needs to accommodate pedestrians as shown on the CWTP, as well as providing connection to the CCT route.
 - The Route 28 and Braddock Road overpasses needs to accommodate pedestrians, as shown on both the CWTP and SWTP.
 - The highway bridge over Route 29 needs to accommodate pedestrians crossing underneath the highway along Route 29 as specified on the CWTP and SWTP.
 - The highway bridge over Compton Road needs to accommodate pedestrians crossing underneath the highway along Compton Road as per the CWTP and SWTP.
 - At Cub Run the Park Authority would like to continue the Cub Run Stream Valley trail underneath Route 66 to connect to Bull Run Regional Park as recommended by the SWTP.
11. Page 4-63 of the Draft Environmental Assessment states: “The proposed project would result in removal of wildlife habitat, including forest areas. As noted in Table 4-2, the potential impacts to forests within proposed right of way for Alternative 2A and Alternative 2B are 74.47 acres and 55.23 acres, respectively. In addition, there are 76.61 acres of forest within the existing VDOT right of way, which may potentially be impacted by either Build Alternative. A more detailed analysis of impacts based on proposed limits of grading for the preferred alternative will be conducted during project design. The effects of the proposed project on wildlife habitat would not be substantial regardless of the alternative selected. Habitat loss would generally occur within small isolated habitat patches or along edges of habitats that are already considerably fragmented. No potential movement corridors would be substantially disrupted because impacts would take place along the existing I-66 roadway.” The actual total forested habitat loss for this project ranges from 131-150 acres within the existing and proposed rights of way, by staffs calculations. This loss should not be categorized as insubstantial, as the ongoing, cumulative loss of canopy and habitat fragments impacts regional wildlife populations.

12. Section 4.10.2 of the Draft Environmental Assessment discusses several existing wetlands, without locational information. At which parks do these wetlands occur or are they mainly in the existing ROW? Please provide a map of the WOUS, cross-referenced with public lands.
13. Section 4.10.3 of the Draft Environmental Assessment, states that stormwater management facilities will be an important component of this project to address expected increases in sedimentation and pollution from the widening of I-66. This is particularly important in regards to existing impaired waterways such as Accotink Creek, where I-66 traverses the headwaters.
14. Page 4-63 of the Draft Environmental Assessment, Section 4.14 Natural Heritage Resources lists potential impacts to Cub Run Slopes Conservation Site, Ellanor C. Lawrence Conservation Site, Big Rocky Run above Rt. 28 Stream Conservation Unit (SCU), and Long Branch SCU.” While the Ellanor C Lawrence Conservation Site should not be affected by this project, efforts should be made to reduce potential impacts to Cub Run Slopes Natural Heritage Area, as well as the Natural Heritage Stream Conservation Units at Big Rocky Run above Rt. 28 and Long Branch, at site design. Most stream impacts from this project will occur in the existing ROW.
15. The plan set for Concept 2A shows the proposed roadbed realignment of Monument Drive being shifted onto the new Public Safety Building currently under construction at the corner of Random Hills Road (where the consultant’s ortho photo is showing a diamond field). Even if this alignment did not hit the building, it is certainly within the 50’ security standoff for the new building. Staff recommends shifting the intersection to the east using more of the existing parking lot to accommodate the proposed ramps.
16. The plan set for both Concept 2A and 2B shows the project limits extending to the ROW / property lines adjacent to Bull Run Regional Park, Briarwood Park, Random Hills Park, Cub Run Stream Valley Park, and Rocky Run Stream Valley Park. These parks could potentially be impacted by the project if the required area were expanded to accommodate engineering, grading, staging, stormwater, or expanded construction requirements. Provisions to deal with such circumstances should be made within this Draft Environmental Assessment in case they are needed.
17. As noted previously in the Park Authority’s comments on the Tier 1 EIS, more detailed study is needed once engineering plans have been created, including pedestrian and park trails. The Park Authority would be pleased to assist with planning efforts in this regard. Of particular concern are the W & OD Trail, Sully Woodlands Trail System, Gerry Connolly Cross County Trail (GCCCT), Cub Run Stream Valley Trail, as well as the overpasses at Route 123, Jermantown Road, Route 28, Route 29, and Compton Road.
18. Though land acquisition would occur later in the improvement process, we want to place in the comment record, that requests for land rights on Park Authority owned property are necessary in order to perform any surveying, clearing, or grading, even within an easement of any sort. Before performing, any activity on parkland, a Right of Entry

License, Easement, and / or Construction Permit is required and can be requested from the Easement Coordinator, Fairfax County Park Authority, Planning and Development Division, 12055 Government Center Parkway, Suite 406, Fairfax, Virginia 22035. The main telephone number is (703) 324-8741. This includes surveying, test boring, wetland flagging, utility relocations, construction, or any other related activities. Please advise any contractors and subcontractors of this requirement.

Thank you for the opportunity to comment on this Tier 2 EA. We look forward to participating in this project as it moves forward. Our point of contact for this project is Andy Galusha, Landscape Architect / Park Planner who can be reached at 703-324-8755 or Andrew.Galusha@fairfaxcounty.gov.

Copy: Sandy Stallman, Manager, Park Planning Branch, PDD
Robert Kuhns, Transportation Planning Division, FCDOT
Cindy Walsh, Director, Resource Management Division
Liz Crowell, Manager, Cultural Resource Management & Protection Section
Brian Williams, Manager, Land Acquisition & Management Branch
Chron Binder
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Tier 2 Draft Environmental Assessment, I-66 Corridor Improvements
General comments—DPZ-Environment and Development Review in coordination with DPWES-Stormwater
May 2015

Tree Cover

- The EA does not provide information about the loss of tree cover beyond an overall identification of a potential loss of tree cover of 74.47 acres for Alternative 2A and 55.23 acres for Alternative 2B. There are no maps identifying where tree canopy will be lost and nothing to indicate how the project designers and construction crews will attempt to minimize clearing. Nor is there anything that addresses the visual impacts of tree loss (i.e., how many existing residences along the corridor will be adversely affected from a visual perspective due to tree loss) or replacement through landscaping. The draft EA does not allow us to fully understand the implications of the potential impacts to tree cover.
- The project team should be encouraged to look closely at design details to identify opportunities that may be available in places to reduce the extent of tree clearing that will be needed through a reduced project footprint.
- The EA does not indicate the extent to which landscaping will be pursued to mitigate the loss of tree cover and associated visual impacts to neighboring residences. To what extent will landscaping be pursued? We recommend that landscaping efforts incorporate only noninvasive species that are native to the area.

Stormwater Management

- It is our view that the EA does not provide information sufficient to allow us to offer substantive comments on potential water quality and quantity impacts beyond the general comments we are offering here. The draft Environmental Assessment states: “Stormwater management measures, such as detention basins, vegetative controls, and other measures, will be implemented in accordance with Federal, state, and local regulations to minimize on-site and downstream water quality impacts. These measures will reduce or detain discharge volumes and remove sediments and other pollutants, thus avoiding substantial further degradation of impaired water bodies in the project vicinity.” However, no information is provided, either in the EA or the Natural Resources technical report, to allow us to understand how this will be done. Proposed stormwater management facility locations are identified on the conceptual plans, but additional information is lacking. Further, while it is our understanding that that the project has been grandfathered from the new state stormwater management regulations, the EA does not note what specific requirements will be followed. Clarification is needed.
- In comparing the two sets of conceptual plans available from the project website (the May/June public hearing exhibits and the Preliminary Alternatives Maps from earlier in 2015), it is clear that the extent of the proposed system of stormwater management facilities has been reduced considerably, both in terms of numbers and sizes of facilities proposed. It is our understanding that this is a result of the state’s determination that the project will be grandfathered from the new state stormwater management regulations. The effect has been to reduce the overall stormwater management facility footprint, resulting in a reduction in the number of residences that would need to be taken in support of this project. While we commend the project team for reducing the extent of residential relocations that would be needed, and while we do not suggest that the number of such relocations should be increased

in order to support strengthened stormwater management efforts, we are concerned about implications of this reduced stormwater management effort to aquatic resources along and downstream of the project area.

We feel that an emphasis is needed at this time on the identification of opportunities to maximize stormwater management efforts. Consideration should be given to both VDOT's and Fairfax County's MS4 permit requirements, including mitigating water quality impacts of prior developed lands. This includes addressing any present (and future local) TMDLs (Total Maximum Daily Loads) through enhanced stormwater measures as a part of this project's construction. Simply designing a stormwater management system to previous standards would not adequately address any shortcomings in the existing stormwater management system resulting from design and construction efforts that occurred before more stringent requirements for stormwater management were established. The recently adopted state stormwater management regulations, which were adopted in Fairfax County, now seek to address stormwater management deficiencies of the previous requirements, which are being perpetuated by an adherence to the old design standard for this project. In addition, such an approach would not be supportive of the county's watershed management plans, which have served to document the overall conditions of watersheds and provide a framework to improve the ecological conditions in the county's streams. Nor would it be consistent with the level of stormwater management enhancements achieved on the completed I-495 Express Lane project. It is also not clear from the information provided that there would not be additional degradation of streams resulting from the additional impervious surfaces that would result from this project.

We understand that the project is in the earliest stages of design and therefore feel that there may be opportunities to explore whether stormwater management measures above and beyond the required minimums could be incorporated into the project design without necessitating additional residential relocations. We recommend that the project team explore stormwater management strategies and outfall treatments that would minimize the potential for stream erosion downstream of the project and correct any existing deficiencies while minimizing clearing that would be needed. The Stormwater Planning Division of the Department of Public Works and Environmental Services played an integral role previously during the implementation of the I-495 Express Lanes and is again available to partner with this project team in order to identify such opportunities within the Fairfax County portion of the project. Efforts that should be considered should include retrofits of existing stormwater management facilities within and near the project area, underground stormwater management within the proposed project right-of-way and/or implementation of projects from applicable watershed management plans.

- There are a number of proposed stormwater management facilities shown on the conceptual plans that may be problematic as they relate to past zoning approvals, the county's Environmental Quality Corridor policy, and/or conservation easements. Specifics are provided in our detailed comments.
- There will need to be considerable clearing of tree cover for construction of a number of the proposed stormwater management facilities. While we commend the project team for focusing the locations of stormwater facilities within highway interchanges, there would be some cases where clearing would have adverse visual impacts on nearby residences. Stormwater management strategies should be developed in a manner that will achieve water quality and quantity control goals while minimizing clearing. Might alternative approaches to stormwater management be available that would have more limited impacts on clearing/land disturbance?

- The legends for the conceptual plans have a symbol for “Potential Manufactured BMP,” but we see no potential sites identified on the plans, at least within the Fairfax County portion of the project area. Where might these facilities be provided? What will they be designed to control?

Stream and wetland impacts and mitigation

- The draft EA indicates that the use of credits from approved stream and wetlands mitigation banks or payments to the Virginia Aquatic Resources Trust Fund would be the anticipated form of stream/wetlands mitigation for the project. While consistent with the wetland and stream compensation hierarchy set forth by the state, as described in the Waters of the U.S. Technical Report, it would probably result in mitigation efforts far from the areas experiencing the wetland impacts. We encourage the project team to seek opportunities to pursue compensation efforts close to the areas of impact. Incorporation of wetland features within the designs of stormwater management facilities should be considered, as should be the pursuit of projects identified in the county’s approved watershed management plans.
- In the discussion of stream impacts on page 4-54, the EA (referencing Table 4-16) notes that estimated stream impacts “are based on an assumption that each stream crossing would be a permanent impact rather than spanned by a bridge. A more detailed assessment of stream impacts and avoidance and minimization efforts will be performed during the design phase.” Further, in the discussion of indirect effects on page 4-76, the EA states: “. . . while it is reasonable to predict that direct impacts to water quality may occur at stream crossings of I-66, there is not enough information to determine how far downstream such impacts would actually occur.” We feel that these impacts should be assessed as soon as possible and, consistent with our earlier comments addressing stormwater management, we recommend that stormwater management measures above and beyond minimum requirements should be pursued where necessary to ensure that there will not be adverse downstream impacts resulting from stormwater runoff from the highway. BMP selection for linear projects presents unique challenges, and as the I-66 corridor approaches build-out conditions, stormwater management for the expanded I-66 corridor should involve careful planning and the use of innovative as well as traditional stormwater management strategies and technologies. We again note that the Stormwater Planning Division is available to partner with VDOT’s project team in order to identify and maximize opportunities for enhanced stormwater treatments and alternative measures within the Fairfax County portion of the project.
- In the county’s review of the Tier 1 Environmental Impact Statement, we requested clarification as to whether or not the estimates of stream impacts were only considering streams crossed by the corridor, or if impacts to streams paralleling the corridor but not crossed (i.e., Big Rocky Run and Cub Run west of the Lee Highway interchange) were also considered. The EA does not address this question.
- The last paragraph on page 4-56 of the EA states that no TMDLs have been approved for the impaired stream segments within one mile of the project corridor. Additionally, Table 4-19 on page 4-57 identifies impaired water bodies located within one mile of the project corridor—specifically, impairments for *E. coli* in Cub Run and Holmes Run, PCBs in Bull Run, and benthic macroinvertebrate impairments in Big Rocky Run, Little Rocky Run, Accotink Creek and Holmes Run are noted. It is not

clear why the discussion is limited to the area within one mile of the project corridor, as any construction and post-construction requirements that may be triggered by TMDLs addressing impairments further downstream would apply to the portions of the affected watersheds within the project area.

- The EA notes that TMDLs have been approved for impaired waters that are more than one mile from the project corridor but that are downstream of the corridor. There is no specific mention, though, of the existing TMDLs for sediment in Bull Run and Difficult Run. Additionally, the EA does not discuss the pending pollutant-based TMDL for upper and lower Accotink Creek (and we note that the upper portion of the impaired stream crosses through the project area).

Resource Protection Areas and Environmental Quality Corridors

- The Environmental Assessment does not identify impacts to Resource Protection Areas that would be associated with the alternatives that have been identified. Both Prince William County and Fairfax County have designated Resource Protection Areas pursuant to Virginia's Chesapeake Bay Preservation Act, yet these areas are not addressed in the draft EA. They should be.
- Similarly, the EA provides a brief mention of Fairfax County's Environmental Quality Corridor policy (on page 4-81) but does not identify impacts to areas that would likely meet the EQC designation criteria as established in the county's Comprehensive Plan. While some EQC and RPA impacts cannot be avoided given the nature of the project, some impacts could perhaps be avoided or reduced (e.g., disturbance of stream valley areas for stormwater management facilities). Efforts should be pursued to minimize adverse impacts to areas that would qualify for EQC designation.

Watershed management plans

- Page 4-58 of the EA references the Accotink Creek Watershed Management Plan but does not identify the other watershed management plans that have been approved for watersheds within the project area. Specifically, the following watershed management plans also apply to the project area: Cub Run/Bull Run; Little Rocky Run/Johnny Moore Creek; Difficult Run; and Cameron Run. The Lower Occoquan Watershed Management Plans referenced on page 4-59 do not address watershed areas within the project area, but they do identify projects that would serve to improve the quality of streams upstream of the Occoquan Reservoir, which is, as noted in the EA, also located downstream of a considerable portion of the project area. Opportunities for implementation of watershed management plan projects should be considered in conjunction with the development of stormwater management plans for the highway project.

Noise

- The draft EA states: "Final decisions at that time on whether to provide noise abatement measures will take into account design feasibility, cost, and the opinions of property owners impacted by the noise." With respect to opinions of residences, we note that page 40 of the Preliminary Noise Analysis document, as well as Section 7.3.10.1 of VDOT's Highway Traffic Noise Impact Analyses Guidance Manual, specify that fifty percent or more of the respondents to surveys of benefited receptors (e.g., a

resident who would benefit from the proposed noise barrier construction) must favor the construction of the barrier for the barrier construction to be considered reasonable (with some weighting of the votes as set forth in the manual). While we do not anticipate that there would be an impacted community within which more than half of the affected residents would object to a barrier, we are concerned that, if such a scenario was to develop and if a noise barrier was not constructed as a result, future residents of the community might not share the objections of current residents. If such a scenario was to develop, we recommend that provisions should be made for the eventual construction of a noise barrier if/when the affected community would support it.

- VDOT's Highway Traffic Noise Impact Analysis Guidance Manual indicates that the heights of noise barriers that will be considered for construction for highway projects will not exceed 30 feet. This is consistent with the Preliminary Noise Analysis, which does not model barriers higher than 30 feet. The manual also states: "When an existing noise barrier is physically impacted and/or relocated as part of a Type I project, the same level of protection must be provided." There is at least one noise barrier in the project corridor that is higher than 30 feet (in Common Noise Environment area AC), and we feel that VDOT should ensure, consistent with the excerpt from the manual, that, if such barriers need to be relocated as a result of the highway project, the replacement barriers will not reduce the extent of noise mitigation provided by the existing barriers. This should include a consideration of impacts to upper levels of residences (even where balconies are absent)—in the case of CNE AC, the existing barrier was constructed in part to reduce noise exposures at upper level building facades.
- We have a few questions regarding locations of possible noise barriers that will be considered further during the design process (and whether there may be gaps in some of the barrier systems)—please see our detailed comments.