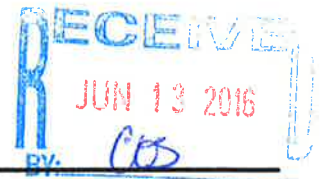


Correspondence Section



County of Fairfax, Virginia

To protect and enrich the quality of life for the people, neighborhoods and diverse communities of Fairfax County



June 6, 2016

Ms. Halie Stannard
Environmental Specialist
Virginia Department of Transportation
4975 Alliance Drive
Fairfax, Virginia 22030

RE: Environmental Scoping Comments
Transform I-66 Inside the Beltway – Eastbound Widening
VDOT Project 0066-96A-417, P101, R201, C501 (UPC 108424)

Dear Ms. Stannard:

On behalf of Fairfax County staff, I am writing to you in response to your recent letter to Chairman Martin Nohe of the Northern Virginia Transportation Authority, with a copy to Sharon Bulova, Chairman of the Fairfax County Board of Supervisors, requesting information relating to potential environmental impacts associated with the referenced project.

Your letter indicates that only a small segment of the project is located within Fairfax County. The comments below are limited to only those portions of the project that are located within, or could have an affect upon, Fairfax County.

Fairfax County Public Schools (FCPS)

The FCPS system expressed concern regarding the use of an EZ Pass for school buses. While School buses are free to use these roads, they are still required to have a transponder or EZ Pass. Acquiring and maintaining 1,600+ transponders for each FCPS bus traveling into the District of Columbia, Alexandria, or Arlington on field trips each year presents a significant problem for the FCPS system. Battery life for these devices is only a few years and they must be mounted on a specific bus (rather than being moved from bus to bus for occasional or sporadic need). FCPS is concerned that maintaining this volume of equipment presents us with a much bigger obstacle than their current and more limited and scheduled in-county use on a few hundred buses.

Fairfax County Department of Planning and Zoning (DPZ)

Since most of this project lies outside of Fairfax County, there is only a limited potential for adverse impact to natural resources within the county. However, a number of issues warrant consideration in the Environmental Assessment (EA), as outlined below.

Fairfax County Department of Transportation
4050 Legato Road, Suite 400
Fairfax, VA 22033-2895
Phone: (703) 877-5600 TTY: 711
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Property Impacts

- It is unclear from the documentation provided if it is intended that the widening project would be implemented entirely within the existing highway right-of-way in the Fairfax County portion of the project. There are a number of residential properties that abut the right-of-way, along with a school and recreation facility. Ideally, the widening project should be designed to avoid any increases to the width of the right-of-way in Fairfax County. If this will not be possible, the EA should document any property impacts (including residential relocations and takings of private property) and address how such impacts will be minimized. The DPZ assumes that the presence of Metrorail in the highway median will serve to preclude any changes north of the rail line, but if this is an incorrect assumption, the potential for property impacts to the north of the highway should be considered, as well as impacts to the south.

Natural Resource Impacts

- Per standard NEPA requirements, the EA should address impacts to wetlands, streams, Resource Protection Area, floodplains, tree cover and rare, threatened or endangered species and/or rare vegetative communities. There are no Resource Protection Areas within the Fairfax County portion of the project along the eastbound lanes, but the RPA associated with Four Mile Run is located within and north of the highway right-of-way near the Arlington County boundary.
- Coordination with the Stormwater Planning Division of the Fairfax County Department of Public Works and Environmental Services (DPWES) is recommended in regard to stream/outfall stabilization associated with any stormwater discharges within the Fairfax County portion of the project area.

Watershed Management Plan

- The Stormwater Planning Division of DPWES should be contacted for information regarding any projects identified in the watershed plans for the Pimmit Run and Four Mile Run watersheds and whether there may be opportunities to incorporate any of these projects within the project scope (e.g., for stormwater management or mitigation purposes). In general, the Pimmit Run and Four Mile Run watersheds are two of the most degraded within the county. The project is located in the headwaters of these watersheds, and as such, a great opportunity exists to implement best management practices that will have positive and significant broader impacts on downstream areas within these watersheds.

Stormwater Runoff

- The EA documentation should identify the stormwater runoff impacts (both volume/quantity and quality) that would result from the proposed construction as well as the additional impervious cover, if any, that would result from the project. Efforts should be pursued to minimize additional impervious cover consistent with project goals. Stormwater management plans should be discussed within the documentation. Early coordination with the

Stormwater Planning Division is recommended on stormwater management designs. This will be of particular importance, if stormwater management requirements will cause there to be a consideration of an expansion of the width of the right-of-way and the taking of property adjacent to the existing right-of-way. Stormwater management strategies should be pursued in a manner that will preclude or minimize such impacts.

- Detention of the 100-year storm should be provided, in accordance with the Northern Virginia Regional Commission and Fairfax County Public Facilities Manual requirements.
- Stormwater management best management practices should be used to manage and detain runoff as close to the source as possible. Low Impact Development (LID) techniques and practices should be pursued as much as possible to reduce stormwater runoff pollution and facilitate infiltration at the source. In areas where conventional stormwater management ponds are to be used, it is recommended that these be designed with enhanced pollutant removal features, such as micro-pools and wetland vegetation to optimize water quality benefits. It is highly encouraged that enhanced outfall treatment devices or energy dissipation designs be used to properly mitigate erosive velocities in downstream receiving channels that are typically the result of increased volume and duration of post construction runoff. This may require going beyond typical standard VDOT outfall treatments and extending channel improvements beyond right-of-way limits.
- Though the State Runoff Reduction Method (VRRM) is currently a requirement for stormwater management, it is possible that this project could be grandfathered from the VRRM. Accordingly, Fairfax County strongly recommends the use of volume reduction methodologies for water quantity and water quality improvements. Again, coordination with the Stormwater Planning Division is recommended.

Other Issues

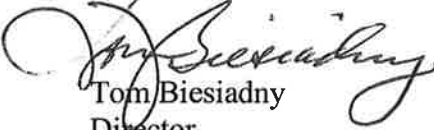
- To the greatest extent practicable, the EB widening should occur within the existing ROW limits.
- Safety and operational impacts will need to be assessed in detail and mitigated where necessary.
- Disruptions to Metrorail service should be minimized.
- County staff assumes that the EA will address highway noise and air quality issues per standard FHWA/VDOT protocols and look forward to seeing the results of noise and air quality analyses.

Many other Fairfax County agencies reviewed the request for comments, but did not have comments. Therefore, the information given above should be regarded as a comprehensive response on behalf of Fairfax County staff.

Ms. Amanda Baxter
June 6, 2016
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I hope that the above information is useful to you in the preparation of the Environmental Assessment for the referenced project. Please do not hesitate to contact Mr. Douglas Miller, Environmental Specialist with the Fairfax County Department of Transportation (703-877-5750; douglas.miller3@fairfaxcounty.gov), if we can be of further assistance.

Sincerely,



Tom Biesiadny
Director

cc: Hon. Martin Nohe, Chairman, Northern Virginia Transportation Authority
Members, Fairfax County Board of Supervisors
Edward L. Long, Jr., County Executive
Robert A. Stalzer, Deputy County Executive
Catherine A. Chianese, Assistant County Executive
Valerie Fulcher, Manager, Office of Environmental Impact Review, Virginia Department
of Environmental Quality
Fred Rose, Chief, Watershed Planning and Assessment Branch, Stormwater Planning
Division, DPWES
Amanda Baxter, Special Programs Manager, Virginia Department of Transportation
Donald Demetrius, Chief, Watershed Projects Evaluation Branch, Stormwater
Management, DPWES
Noel Kaplan, Sr. Planner, Fairfax County Department of Planning and Zoning
Tim Parker, Fairfax County Public Schools
Sung Shin, Planner IV, Fairfax County Department of Transportation



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Suite 500 West
Washington, D.C. 20007-5201

ULI Washington

July 1, 2016

Mr. Paul Stoddard
Transportation Planner
City of Falls Church
Falls Church, Virginia

Dear Mr. Stoddard:

ULI Washington is pleased to support the City's application for funding (6W) for Capital Bikeshare to provide access to the West Falls Church and East Falls Church Metro stations.

ULI Washington is a membership organization that provides training and education opportunities to local government land use officials and private sector developers in the Washington, DC region. Our mission is to provide leadership in the creation of sustainable and thriving communities. The Falls Church proposal is clearly in keeping with our mission.

This project is an excellent example of a cost effective investment which supports transit-oriented communities and provides a regional benefit. Bikeshare is one of the most convenient ways residents of this community with an excellent network of local streets can provide access to the regional transit network, increasing transit trips and reducing vehicle trips. Investing in bicycle/pedestrian access to Metro stations is far more cost effective per rider than spending \$25,000 or more per structured parking space, and frees up the land around stations for economic development – TOD that generates yet more walk, bike and transit trips.

Of special note is the fact that Bikeshare is the only regional transportation element (besides Metro) that crosses jurisdiction lines. It is an excellent example of regional cooperation among jurisdictions, and its expansion provides continued opportunities for multimodal transportation across jurisdictional lines.

Thank you in advance for your positive response to the City of Falls Church's funding request. We are proud to support their work.

Best regards,
Lisa Rother
Executive Director
ULI Washington