APPENDIX K: AGENCY CORRESPONDENCE

Correspondence is organized by agency as follows, and in reverse chronological order.

K.1 Federal
K.1.1 Advisory Council on Historic Preservation
- August 8, 2003
- July 20, 2000
K.1.2 Federal Emergency Management Agency
- June 27, 2000
K.1.3 United States Army Corps of Engineers
- March 22, 2002
K.1.4 United States Department of Agriculture, Natural Resources Conservation Service
- July 8, 2002
K.1.5 United States Department of the Interior, National Park Service
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K.1.6 United States Department of Transportation, Federal Aviation Administration
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K.2 Regional
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K.2.2 National Capital Planning Commission
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K.2.4 Northern Virginia Regional Park Authority
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K.3.1 Commonwealth of Virginia, House of Delegates
- Verbal Testimony at December 2003 Public Hearings (The Honorable Jim Scott)
- Verbal Testimony at December 2003 Public Hearings (The Honorable Kenneth R. Plum)
- August 26, 2002
- Verbal Testimony at July 2002 Public Hearings (The Honorable Kenneth R. Plum)
- Verbal Testimony at July 2002 Public Hearings (The Honorable Kenneth R. Plum)
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- July 22, 2002

K.3.2 Commonwealth of Virginia, Senate
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- January 19, 2001

K.3.4 Commonwealth of Virginia, Department of Conservation and Recreation
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K.3.5 Commonwealth of Virginia, Department of Environmental Quality
- December 18, 2003
  - Participating agencies:
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    - Department of Agriculture and Consumer Services
    - Department of Conservation and Recreation
    - Marine Resources Commission
    - Department of Historic Resources
    - Chesapeake Bay Local Assistance Department
    - Northern Virginia Regional Commission
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    - Town of Leesburg
- October 28, 2002
- August 27, 2002
  - Participating agencies:
    - Department of Environmental Quality
    - Department of Conservation and Recreation
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    - Department of Historic Resources
    - Department of Mines, Minerals, and Energy
    - Department of Forestry
    - Chesapeake Bay Local Assistance Department

K.3.6 Commonwealth of Virginia, Department of Historic Resources
- May 27, 2004
- May 19, 2004
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K.3.7 Commonwealth of Virginia, Department of Mines, Minerals, and Energy
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K.4 County

K.4.1 County of Fairfax, Board of Supervisors
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K.4.2 County of Fairfax, Department of Transportation
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K.4.4 Loudoun County, Board of Supervisors
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K.4.5 Loudoun County, Office of the County Administrator
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K.4.6 Loudoun County, Department of Planning
   ▶ August 31, 2000

K.4.7 Montgomery County
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K.5 Local

K.5.1 City of Falls Church
   ▶ February 25, 2004
   ▶ October 23, 2002 Verbal Testimony at July 2002 Public Hearings (The Honorable Daniel E. Gardner)
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   ▶ July 30, 2002
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- February 4, 1999

K.5.2 Town of Herndon
- December 31, 2003
- August 26, 2002
- April 2, 2002
- August 8, 2000

K.5.3 Town of Leesburg
- February 25, 2004
K.1 FEDERAL
K.1.1 Advisory Council on Historic Preservation

- August 8, 2003
- July 20, 2000
August 8, 2003

Mr. Karl Rohrer, AICP
Project Manager
Dulles Corridor Rapid Transit Project
1550 Wilson Boulevard, Suite 300
Arlington, VA 22209

REF: Proposed Dulles Corridor Rapid Transit Project
Fairfax and Loudoun Counties, Virginia

Dear Mr. Rohrer:

The ACHP received your notification and supporting documentation regarding the adverse effects of the referenced project on properties listed on and eligible for listing on the National Register of Historic Places. Based upon the information you provided, we do not believe that our participation in consultation to resolve adverse effects is needed. However, should circumstances change and you determine that our participation is required, please notify us. Pursuant to 36 CFR 800.6(b)(iv), you will need to file the final Programmatic Agreement (PA) and related documentation at the conclusion of the consultation process. The filing of the PA with us is required in order to complete the requirements of Section 106 of the National Historic Preservation Act.

Thank you for providing us with your notification of adverse effect. If you have any questions or require further assistance, please contact Martha Catlin at 202-606-8505.

Sincerely,

[Signature]

Dan L. Klima
Director
Office of Federal Agency Programs
Mr. Len Alfredson
WMATA Project Manager
Dulles Corridor Rapid Transit Project
1550 Wilson Boulevard, Suite 300
Arlington, VA 22209

Ref: Dulles Corridor Rapid Transit Project
Fairfax and Loudoun Counties, Virginia

Dear Mr. Alfredson:

Recently the Council received your invitation to a pre-scoping session for the referenced project. While we appreciate your notification and request for our participation in this process, it is not the Council’s role, nor do we have the resources to participate at this stage. However, we do wish to call your attention to the requirements of Section 106 of the National Historic Preservation Act and the Council’s implementing regulations (36 CFR Part 800). The Council’s regulations set forth the steps to be taken in order to identify historic properties and assess effects associated with a proposed Federal undertaking. We strongly recommend that any environmental document be coordinated with the information necessary to initiate and complete the 106 process. If it is determined, in consultation with the Virginia State Historic Preservation Officer and other consulting parties, that the project may adversely affect historic properties, the Council should be notified by the Federal Transit Administration (FTA) and given the opportunity to participate in further consultation to consider means to avoid or minimize those impacts.

FTA and WMATA should initiate coordination with the Virginia State Historic Preservation Officer as soon as possible and work closely with them to take advantage of their knowledge of cultural resources in the area. Any further request for the Council’s involvement regarding this project should be initiated by the sponsoring Federal agency, and accompanied by the requisite supporting documentation specified at 36 CFR § 800.11. Should you have any questions regarding the Section 106 process, you may contact MaryAnn Naber at (202) 606-8534 or by email at mnaber@achp.gov.

Sincerely,

Don L. Klima
Director
Office of Planning and Review
K.1.2 Federal Emergency Management Agency

- June 27, 2000
June 27, 2000

Mr. Len Alfredson
WMATA Project Manager
Dulles Corridor Rapid Transit Project
1550 Wilson Boulevard, Suite 300
Arlington, Virginia 22209

Reference: Dulles Airport—Loudoun County Virginia

Dear Mr. Robb:

This letter is in response to the invitation to attend the pre-scoping session scheduled for July 11, 2000. Our office is unable to send a representative, however we would like to submit our comments at this time. To better respond, let me briefly provide some background information on the National Flood Insurance Program (NFIP). In 1968, the U.S. Congress passed the National Flood Insurance Act, which created the NFIP. The NFIP was later broadened and modified with the passage of the Flood Disaster Protection Act of 1973 and other legislative measures. The NFIP is designed to reduce future flood losses through local floodplain management and to provide protection for property owners against potential losses through flood insurance. As part of the agreement for making flood insurance available in a community, the NFIP requires the participating community to adopt floodplain management ordinances containing certain minimum requirements intended to reduce future flood losses.

Any project involving the development, encroachment, or modification of the 100-year floodplain, including channel relocation, must meet the requirements as stipulated by the community’s floodplain management ordinance.

In support of the NFIP, FEMA has undertaken a massive effort of flood hazard identification and mapping to produce Flood Hazard Boundary Maps (FHBMS), Flood Insurance Rate Maps (FIRM), and Flood Boundary and Floodway Maps (FBFM). Since the proposed project will impact or relocate existing streams, you must apply for a Conditional Letter of Map Revision (CLOMR) prior to construction.

I have enclosed for your use all the necessary application forms required for a CLOMR. As explained in the packet, "Revisions to National Flood Insurance Program Maps", FEMA will issue a Conditional Letter of Map Revision for proposed projects in the 100-year floodplain provided all
the necessary plans and hydraulic data are submitted. FEMA will then follow up with a physical map revision when as-built plans are submitted. The only way we can keep each community's floodplain maps up-to-date is by obtaining your cooperation in this effort.

In addition, Executive Order (E.O.) 11988 requires that Federal agencies avoid the direct and indirect support of floodplain development whenever there is a practicable alternative. The preferred method for satisfying this requirement is to avoid sites in the 100-year floodplain and, for those actions deemed critical, sites in the 500-year floodplain. If an action must be located in the floodplain, then the agency must avoid the long- and short-term adverse impacts associated with the occupancy and modifications of the floodplain and must minimize the potential harm to people and property and to natural and beneficial floodplain values. For example, flood easements, deed restrictions, elevation of residential structures, or buy-outs may be necessary to mitigate property owners adversely impacted by this project.

I have enclosed a copy of a booklet entitled "Floodplain Management Guidelines for Implementing E.O. 11988". Within this booklet, Part II - Decision Making Process, outlines an eight step process designed to reflect the decision making process required under Section 2(a)(1) of the Order. Section 2 states,

"In carrying out the activities described in Section 1 of this Order, each agency has a responsibility to evaluate the potential effects of any actions it may take in a floodplain; to ensure that its planning programs and budget requests reflect consideration of flood hazards and floodplain management; and to prescribe procedures to implement the policies and requirements of this Order."

In summary, the Federal Agency funding or constructing a project is responsible to ensure compliance with E.O. 11988. If the floodplain cannot be avoided, then the minimum requirements of the National Flood Insurance Program must be met.

If you have any questions concerning this letter, the map revision process, E.O. 11988 or any other floodplain management issue, please feel free to contact me (215) 931-5669 or our technical hotline at (877) FEMA MAP (toll free). Additional information may be obtained by logging onto www.fema.gov/mit/tsd.

Sincerely,

[Signature]

Erik J. Rourke
Regional Hydrologist

Enclosure: 1. Revisions to National Flood Insurance Program Maps
2. Floodplain Management Guidelines for Implementing E.O. 11988
K.1.3 United States Army Corps of Engineers

- March 22, 2002
Project Number: 02-N0033

1. Participant:
   Dulles Corridor
   Attn: John Dittemier
   1550 Wilson Boulevard, Suite 300
   Arlington, Virginia 22209

Waterway: Various waterways

2. Authorized Agent:
   Coastal Resources, Inc.
   Attn: Bridgette Girilo
   2988 Solomons Island Road
   Edgewater, Maryland 21037

3. Address of Job Site:
The Dulles Corridor Rapid Transit Project study area begins at the I-66/Dulles Connector Road interchange in Fairfax County and extends north along the Dulles Airport Access/Toll Road to its terminus at the Route 772 interchange with the Greenway in Loudoun County, Virginia.

4. Project Description:
The project consists of a jurisdictional determination for the proposed Dulles Corridor Rapid Transit Project.

5. Findings

   A site inspection has verified that waters and/or wetlands regulated under Section 404 of the Clean Water Act (33 U.S.C. 1344) exist at the location stated above. The wetland delineation and site plan submitted by letter dated June 26, 2001 and revisions contained in your field review memo dated February 27, 2002 by Coastal Resources, Inc., in accordance with the methodology described in the 1987 Corps of Engineers Wetland Delineation Manual. This confirmation is valid for a period of five years from the date of this letter unless new information warrants revision before the expiration date.

   Prior to commencing work you must obtain the proper authorization to perform work in wetlands and/or waters of the U.S. Please note that performing the proposed work without proper authorization would be in violation of the Clean Water Act.

6. Corps Contact: Cynthia J. Wood at (703) 221-6967

   [Signature]

   Chief, Northern Virginia Regulatory

NAO FL 13 REVISED DEC 90
K.1.4 United States Department of Agriculture, Natural Resources Conservation Service

- July 8, 2002
July 8, 2002

Mr. Corey W. Hill
Northern Virginia Regional Manager
Virginia Dept. of Rail and Public Transportation
1550 Wilson Boulevard, Suite 300
Arlington, Virginia 22209

Dear Mr. Hill:

RE: Dulles Corridor Rapid Transit Project Draft EIS

NRCS has reviewed this document to ensure that impacts to soils and prime farmland were adequately documented. Section 4.1.3.3 – Soils and Section 4.1.3.4 – Prime Farmland provide this documentation.

Virginia NRCS has no objection to this proposal.

Sincerely,

M. Denise Doetzer
State Conservationist
K.1.5 United States Department of the Interior, National Park Service

- August 9, 2000
Mr. Len Alfredson, WMATA Project Manager  
Dulles Corridor Rapid Transit Project  
1550 Wilson Boulevard, Suite 300  
Arlington, Virginia 22209

Dear Mr. Alfredson:

I appreciate this opportunity to comment on the Dulles Corridor Rapid Transit Project. I attended the public scoping meeting held on July 26, and I have reviewed the Scoping Information Packet.

Wolf Trap Farm Park for the Performing Arts is the only national park dedicated solely to the performing arts. The park’s primary performance venue, the Filene Center, is an amphitheater that normally operates from mid-May through mid-September. Because the park, our patrons, and our community may be affected by any of the project’s three “build” alternatives, we have a keen interest in the project.

The project’s third build alternative includes a “to be determined” metro station at Wolf Trap Farm Park for the Performing Arts. Our partner, the Wolf Trap Foundation for the Performing Arts, currently contracts for Metro Bus service to and from the West Falls Church Metro Station for Filene Center patrons. There is no other mode of public mass transportation to the park. Therefore, a station that allows access to park facilities and programs, would be a great convenience to our patrons.

However, a full-time, full-service station next to Wolf Trap Farm Park would be troubling. Not only is land availability an issue, we would have concerns about noise, traffic, and other potential conflicts with the park.

We are particularly concerned about any potential noise impacts. Public Law 97-310, establishes acceptable Dulles Road corridor noise levels to protect the Filene Center from undue noise pollution. We are hopeful that potential noise impacts and appropriate mitigation will receive consideration in all alternatives.
Mr. Len Alfredson

A final concern is the Trap Road Bridge that traverses over the Dulles Highway and the Toll Road. This bridge greatly affects traffic circulation in the park and in the neighboring community. Should any of the build alternatives require replacement of this bridge, we would like to be involved in the redesign.

I appreciate your efforts to include us in this project study. If you have any questions or if I can be of any assistance, please do not hesitate to call me at (703) 255-1808.

Sincerely,

[Signature]
William J. Crockett
Director

cc: Mr. Charles A. Walters, Jr., Executive Vice President and CEO
Wolf Trap Foundation for the Performing Arts
1624 Trap Road
Vienna, Virginia 22182
K.1.6 United States Department of Transportation, Federal Aviation Administration

- February 12, 2004
- October 25, 2002
- April 12, 2002
February 12, 2004

Mr. Karl A. Rohrer, AICP
Project Manager, VDPRT
1550 Wilson Boulevard, Suite 300
Arlington, VA 22209

Dear Mr. Rohrer:

We have reviewed the Supplemental Draft Environmental Impacts Statement (EIS) for the Dulles Corridor Rapid Transit Project. The Federal Aviation Administration (FAA) is supportive of the efforts and we have the following comments related to the document.

Concerning FAA’s issuance of a Decision for the Environmental Impact Statement.

We understand that Phase 1 of the project would provide rail access to a station at Whiele Avenue with Executive Bus Service providing access from that station to the airport terminal. This phase also provides for an expansion of the Dulles North Transit Center primarily to provide parking for increased ridership over the existing bus service to points east and to Washington, D.C. Phase 2 of the project would extend the rail service to the airport and construct the rail service yard. Subject to satisfactory completion of the EIS, and after the Federal Transit Administration issues their Record of Decision, we would anticipate issuing an FAA Decision on the entire ultimate project.

Concerning the release of the Dulles Access Highway right-of-way for the Rapid Transit project:

We believe that the Metropolitan Washington Airports Authority (the Authority), which operates the airport under a lease agreement from the United States of America, can provide a right-of-way on airport property, specifically along and within the median of the Dulles Airport Access Highway, provided that it provides a means for passengers to access the airport. Our office would have to review and approve the proposed Right of Way agreement before it is executed by the Authority. However, our office cannot authorize a “fee simple” release of this Right of Way or of any airport property. We can only concur with the Authority releasing their interest in the land for the remaining life of their lease. We believe that release of a “fee simple” interest in the property would require approval action at the U. S. Department of Transportation level or possibly higher.
Furthermore, we believe that the Authority can release its interest in the Right of Way at no cost to the rail operating authority, provided the rail system accesses and benefits the airport. Executive bus service from the proposed Whiele Avenue station to the airport would be considered as providing airport access for the purposes of this no-cost land interest transfer. However, if passenger service is not provided from the rail station to the airport then the Authority’s interest in the land could not be conveyed at no-cost, and the rail authority would have to pay the fair market value for the land interest.

**Concerning the release of airport property for a rail maintenance yard.**

While we can concur with the Authority’s release of its interest in airport property for the rail maintenance yard, the Authority must receive the fair market value for this land. We could consider a reduction in the fair market value proportional to the airport passengers’ share of the use of the rail extension compared to the total passengers. A release of “fee interest” in the land for the rail maintenance yard would require the same approval level as for the access road right-of-way discussed above.

We hope this information is helpful with continued planning for the Dulles Corridor Transit improvements. If you have any questions on the above comments, please do not hesitate to contact us.

Sincerely,

[Terry J. Page, Manager]
Washington Airports District Office

cc: MWAA, Mr. Lebegern
AEA-610, Ms. Mather
APP-600, Mr. Smigelski
Dear Mr. Dittmeier:

As requested in the coordination meeting held October 10th this letter provides elaboration on some of the issues we have raised in our earlier comment letter and various communications we have had over the last year concerning the proposed Dulles Corridor rail project.

As we have stated earlier, under the Federal Aviation Administration (FAA) Policy and Procedures Concerning the Use of Airport Revenue, published in the Federal Register on February 16, 1999, the Authority would be required to obtain the fair market value in compensation for any airport property used for the project. This policy applies to the Dulles Airport Access Road and any stations or other facilities that would be located on airport land.

One of the major issues under discussion has been the siting of a rail yard on airport property. We are concerned that constructing the rail yard on Site 15 appears to have the greatest environmental impacts of the three alternatives presented in the Draft Environmental Impact Statement (DEIS). Also, the FAA believes that a rail yard located on Dulles International Airport is not a desirable use of airport land. We have concerns that the preferred alternative may not pass legal muster under the National Environmental Policy Act since there appears to be an practicable alternative rail yard site that meets the project purpose with less adverse environmental impact.

To access Site 15 on the airport property, the yard rail lead cuts a swath through approximately 2,500 linear feet of mostly forested wetlands and crosses Horsepen Run. The impacts of Site 7, previously identified as the most viable site both operationally and environmentally, has floodplain impacts but no wetland impacts. Federal regulations allow impacts to wetlands only if there are no practicable alternatives. Likewise, Executive Order 11988 has a practicability test for floodplain impacts. Our Airport Environmental Handbook, FAA Order 5050.4a, requires that coordination be done with agencies with special interest in wetlands. This Order states that agencies with permitting actions, such as the U.S. Army Corps of Engineers and state agencies, Virginia
Department of Environmental Quality (DEQ) in this case, shall be asked to advise if they foresee any difficulty issuing their permits for the project. I understand from our last meeting that the Corps has not been asked this but the DEQ may have commented. We suggest that you coordinate with these agencies and provide documentation from them in the Final Environmental Impact Statement (FEIS). The FEIS must demonstrate that Site 15 is the least damaging practicable alternative if it were to be approved. The FAA is required to write a Record of Decision (ROD) for the project that must pass legal review.

We have also expressed concerns about security for the Airport. The project, particularly the proposed rail yard, is a substantial intrusion into airport property. As we discussed, the Transportation Security Agency (TSA) now handles airport security. We would not be comfortable with the proposed project unless TSA “signs off” on the project. The Federal Transit Administration may also require “sign off” for the whole project since it is a transportation project and may be within the purview of TSA.

In order for FAA to write a favorable ROD for the project, first the Federal Transit Administration (FTA) must issue their ROD and the Metropolitan Washington Airports Authority must show the project on their Airport Layout Plan and obtain FAA approval.

At the last meeting, MWAA’s policy on keeping occupied structures out of the inner approach to runways was discussed. This is an extension of FAA’s policy to keep Runway Protection Zones clear of places of public assembly as well as some other uses. The building associated with the rail yard is shown outside of the approach to a proposed new runway located 4,000’ west of the existing Runway 11/19R. As discussed, this is only one of several alternatives for the location of the proposed new runway that is being studied in our EIS. If a new runway were to be constructed at some other separation distance from the existing runway, the design of the rail yard must respect the new approach or MWAA must revise their policy.

If you have any questions about these comments, please contact Mr. Joe Delia at (703) 661-1358 in regard to the land issues or Mr. Frank Smigelski at (703) 661-1365 in regard to environmental issues.

Sincerely,

Terry J. Page, Manager
Washington Airports District Office

cc:  Mr. Glenn, FTA
     Mr. Hackett, MWAA
     Ms. Mather, AEA 610
April 12, 2002

Mr. John Dittmeier
Dulles Corridor Rapid Transit Project
1550 Wilson Boulevard, Suite 300
Arlington, VA 22209

Dear Mr. Dittmeier:

Thank you for sending the Federal Aviation Administration (FAA) the 95% Draft Environmental Impact Statement (DEIS) for the Dulles Corridor Rapid Transit Project. We have several comments for you to consider.

As you know from our meeting, held October 17, 2001, a rail yard sited on Dulles International Airport is not a desirable use of airport land. Rail yard Site 15, one of three remaining alternatives, would be located on the airport. If it is determined through the EIS process that this site meets your operational needs and receives environmental approval, land will have to be acquired from the airport.

The land on which Site 15 is located is dedicated airport property. The Metropolitan Washington Airports Authority (the Authority) is required to seek FAA approval for the release of any property dedicated for airport purposes as identified on the Exhibit "A" Property Map for the airport. Also, under the Federal Revenue Diversion Policy, FAA will be required to publish the intent to release this property in the Federal Register for 30 days to solicit public comments. The Authority would be required to obtain the fair market value in compensation for the property.

We are also concerned with the comparison of environmental impacts for the three rail yard sites. Site 15 appears to have the greatest environmental impacts. In addition to the impacts quantified in the 95% DEIS, it appears that there would be additional impacts to resources. It appears that a swath would have to be cut through the forested wetlands and that additional fill, beyond the footprint of the pier footings, would have to be placed for construction access and perhaps track maintenance. We believe that these impacts should be quantified and presented in the DEIS.

The graphics provided should be consistent. The Draft General Plans for Facilities show environmental resources on some drawings yet they are omitted on others. For example, sheet 922, Metrorail Yard Site 7 shows wetlands, waters and floodplains in the area while
sheet numbers 925 depicting the Metrorail Yard Site 15 and sheet 926 depicting Metrorail Yard Site 20 do not show these environmental resources.

If you have any questions about these comments, please contact Mr. Joe Delia at (703) 661-1358 in regard to the land issues or Mr. Frank Smigelski at (703) 661-1365 in regard to environmental issues.

Sincerely,

Terry J. Page, Manager
Washington Airports District Office

cc: Mr. Hackett, MWAA
K.1.7 United States Environmental Protection Agency

- December 18, 2003
- August 20, 2002
Dear Mr. Roher:

In accordance with the National Environmental Policy Act (NEPA), and Section 309 of the Clean Air Act, the Environmental Protection Agency Region 3 (EPA) offers the following comments regarding the Dulles Corridor Rapid Transit Project Supplemental Draft Environmental Impact Statement (SDEIS) and Section 4(f) Evaluation. This project was initially described in the context of a Draft Environmental Impact Statement (DEIS) in June 2002. EPA rated the DEIS and the locally preferred alternative with Lack of Objections with Adequate documentation (LO-1) in August 2002.

The SDEIS describes and summarizes changes of the potential transportation and environmental impacts related to minor design changes that resulted from the review of the DEIS and public comments. In addition, due to funding constraints, the overall project is now proposed to be completed in two phases with the final completion pushed to 2015 instead of 2009. These changes in the project scope and design were made after the completion of the DEIS and are the major focus of the SDEIS.

The locally preferred alternative continues to be the development of the full scope of the project with the minor design changes that resulted from the review of the DEIS and public comment. The project limits extend 24 miles from the vicinity of the existing West Falls Church Metrorail station in Fairfax County, Virginia westward to the vicinity of Rt 772 just west of Dulles Airport in Loudoun County, Virginia. The project is located in the rapidly growing and heavily congested Dulles Corridor which includes Dulles International Airport and the major employment hub of Tyson’s Corner. The project would serve to link these major traffic generators with the regional mass transit system providing a direct rapid transit link between downtown Washington DC, Tyson’s Corner and Dulles Airport.

Alternatives studied in the SDEIS included 1) the no-build alternative, 2) the DEIS locally preferred alternative (Metrorail extension to Dulles Airport), 3) the SDEIS modified locally preferred alternative (Metrorail extension to Dulles Airport with design modifications) and 4) a phased approach, which includes Metrorail extension as far as Tyson’s Corner and interim bus service to Dulles Airport by 2009 with completion of the Metrorail to Dulles Airport by 2015.
The suggested design changes to the locally preferred alternative, Alternative 3, mostly resulted in no change or a reduction in impacts. There are no identified major community impacts, Environmental Justice issues, or natural resource issues. The project continues to be confined to existing right-of-way or is located on existing parking lots, streets and other developed lands. There are still no residential displacements and commercial displacements appear to be less as a result of the revisions. Wetland and stream impacts are less than that associated with a typical residential development in the area. The modified Metrorail alternative remains on the Metropolitan Washington Council of Governments (MWCOG) Constrained Long Range Transportation Plan (CLRP) and it conforms with regional air quality plans.

Phasing of the project will result in total impacts similar to the SDEIS modified locally preferred alternative (Metrorail extension to Dulles Airport with design modifications). However, phasing of the project does appear to adversely effect early year ridership numbers and thus may have less of an air quality and traffic benefit in the short run as compared to an early full build out. However, all alternatives conform to the regional air quality plans.

Consequently EPA continues to rate the Dulles Corridor Rapid Transit Project and the SDEIS with a Lack of Objections with Adequate documentation (LO-1). We encourage the development of the full Metrorail alternative because with the highest ridership, it will have the greatest capacity of moving people through the corridor, and should have the greatest impact on reducing congestion and air pollution.

If you have any questions or concerns regarding this letter please feel free to contact me at 215-814-2995 or Mr. Peter Stokely of my staff at 703-648-4292.

Sincerely,

William Hoffman, Director
Office of Environmental Programs
Mr. Corey W. Hill  
Northern Virginia Regional Manager  
Virginia Department of Rail and Public Transportation  
1550 Wilson Boulevard  
Suite 300  
Arlington, VA 22209  

Dear Mr. Hill:  

In accordance with the National Environmental Policy Act, and Section 309 of the Clean Air Act, the Environmental Protection Agency Region III (EPA) offers the following comments regarding the Dulles Corridor Rapid Transit Project Draft Environmental Impact Statement (DEIS) and Section 4(f) Evaluation.  

The DEIS describes and summarizes the potential transportation and environmental impacts related to developing major new transit system enhancements in the Dulles Corridor by providing a direct connection to the existing regional Metrorail system. The project limits extend 24 miles from the vicinity of the existing West Falls Church Metrorail station in Fairfax County, Virginia westward to the vicinity of Rt 772 just west of Dulles Airport in Loudoun County, Virginia.  

Alternatives studied in the DEIS included 1) the no-build alternative, 2) Bus Rapid Transit on a dedicated ROW the entire project length, 3) Metrorail extension to Tysons Corner and Bus Rapid Transit to the westward limits of the study, 4) Metrorail the entire project length and 5) a phased implementation of the full Metrorail alternative beginning with Bus Rapid Transit, followed by incremental construction of Metrorail.  

This project is located in the rapidly growing and heavily congested Dulles Corridor which includes Dulles International Airport and the major employment hub of Tysons Corner. The project would serve to link these major traffic generators with the regional mass transit system providing a direct rapid transit link between downtown Washington DC, Tysons Corner and Dulles Airport.  

Environmental impacts of this proposal are minor and EPA has not identified any potential environmental impacts that would require substantive changes to any of the alternatives. The project is confined to existing right-of-way or is located on existing parking lots, streets and other developed lands. There are no residential displacements and up to only six commercial displacements associated with any of the alternatives. The Metrorail alternative is on the Metropolitan Washington Council of Governments (MWCOG) Constrained Long Range Transportation Plan (CLRP) and it conforms with regional air quality plans. Wetland and stream
impacts are less than that associated with a typical residential development in the area. Noise, vibration and visual impacts were the only significant issues identified in the DEIS and the DEIS identified ways to minimize and mitigate these impacts.

Projected opening year ridership is estimated to be 27,000 to 72,000 average weekday riders depending on the alternative chosen. This project will provide a clean air alternative transportation mode for many commuters and travelers. The environmental impacts are less than the typically more environmentally damaging highway improvements. For example this project is projected to move up to 87,000 riders a day by 2025 with no residential displacements. Compare that to the recently proposed Capital Beltway improvements which displaced up to 300 residences and would adversely impact many more, while providing 2025 capacity for 2000-6000 more cars each rush hour or up to 42,000 cars per day.

Consequently EPA rates this project and the associated documentation with Lack of Objections with Adequate documentation (LO-1). Enclosed for your reference is a copy of EPA’s rating system. We encourage the development of the full Metrorail alternative because with the highest ridership it will have the greatest capacity of moving people through the corridor and should have the greatest impact on reducing congestion and air pollution. The full Metrorail alternative will be a permanent alternative to the heavily congested roads in the Dulles Corridor and is supported by more businesses, residences and community groups than any other alternative. In addition, the full Metrorail alternative is on the MWCOC CLRPS and has been found to conform to regional air quality plans.

If you have any questions or concerns regarding this letter please feel free to contact me at 215-814-3367 or Mr. Peter Stokely at 703-648-4292.

Sincerely,

[Signature]

William Arguto
NEPA/Fed Fac Team Leader

Enclosure
Environmental Impact of the Action

LO--Lack of Objections
The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC--Environmental Concerns
The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

EO--Environmental Objections
The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU--Environmentally Unsatisfactory
The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEO.

Adequacy of the Impact Statement

Category 1--Adequate
The EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2--Insufficient Information
The draft EIS does not contain sufficient information for the EPA fully assess the environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3--Inadequate
EPA does not believe that draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEO.

K.2 REGIONAL
K.2.1 Metropolitan Washington Airports Authority

- December 29, 2003
- August 27, 2002
- August 10, 2000
Mr. Karl A. Rohrer  
Project Manager  
Virginia Department of Rail and Public Transportation  
1550 Wilson Boulevard, Suite 300  
Arlington, VA 22209

Dear Mr. Rohrer:

On behalf of the Metropolitan Washington Airports Authority (Airports Authority) I am pleased to reiterate our support for the Dulles Corridor Rapid Transit Project, and to comment on the October 2003 Supplemental Draft Environmental Impact Statement and Section 4(f) Evaluation. The Airports Authority has a very substantial interest in providing the best access to Washington Dulles International Airport (IAD) for the Washington metropolitan region, and supports the extension of Metrorail to IAD as vital to such access. For this reason, the Airports Authority Board of Directors on November 6, 2002 endorsed the Metrorail alternative, providing heavy rail service through the entire corridor, as essential to the region’s and its own interests, and the Board urged the Commonwealth Transportation Board to adopt Metrorail as the Locally Preferred Alternative.

The Airports Authority is disappointed that the Federal Transit Administration is considering only a first phase of construction, from West Falls Church to Wiehle Avenue, for inclusion in the FY 2004-2009 New Starts Program and is making no commitment to funding the completion of the project to IAD and beyond. Nevertheless, we are pleased that the proposed Phase I does not stop at Tysons Corner, but carries the project back to the median of the Dulles International Airport Access Highway (DIAAH).

The Authority’s continued support of the project is subject to three conditions:

1. The FTA reauthorization process needs to recognize the ultimate goal to complete the rail line out to and beyond IAD.
2. Advanced additional engineering, must proceed beyond the initial segment and include the entire project.
3. There needs to be a Memorandum of Understanding among the local partners that captures a joint commitment to see the entire project through to completion.
A list of more specific comments is attached. In conclusion, the Airports Authority supports rail in the Dulles Corridor as consistent with the Master Plan for Washington Dulles International Airport.

Sincerely,

[Signature]

Frank D. Holly, Jr.
Vice President for Engineering

Attachment

RCC: pp
ATTACHMENT 1

Specific Comments
Supplemental Draft Environmental Impact Statement and Section 4(f) Evaluation
Dulles Corridor Rapid Transit Project

1. The Airports Authority supports the concept of Premium Bus Service as an
interim measure that would provide non-stop service on 15-minute headways
between the Wiehle Avenue Station and the Main Terminal, Washington Dulles
International Airport.

2. The establishment of construction staging areas on Airport property will need to
be coordinated with the Airports Authority to ensure that adequate provisions are
made to mitigate potential adverse effects on existing and planned uses of
candidate sites.

3. The discussion of the proposed Route 28 Station (page 2-32 of the SDEIS)
indicates that the DIAAH would need to be realigned to accommodate the
proposed station, and that the Dulles Toll Road would need to be realigned to
allow future construction of a third lane in each direction on the realigned
DIAAH. The SDEIS declares that the “future effects of this widening are no
longer assumed to be a direct effect of the Dulles Corridor Rapid Transit Project.”
The Airports Authority strongly disagrees with this assertion. In our August 27,
2002 comments on the Draft EIS, we stressed our future plans to widen the
DIAAH to six lanes, and we emphasized the need for the Dulles Corridor Rapid
Transit Project not to infringe on the right-of-way for the future widening.
Realignment of the Toll Road to preserve this right-of-way is indeed a direct
effect of the Dulles Corridor Rapid Transit Project, and the effects of this
realignment need to be addressed in the EIS for the Dulles Corridor Rapid Transit
Project.

4. Regarding the discussion of the Dulles Airport Historic District (page 3-33), the
Airports Authority maintains that the eastern boundary of the eligible historic
district does not extend east of the location on the DIAAH where westbound
travelers are first able to view the Main Terminal and the original Air Traffic
Control Tower.

5. Regarding issues to be resolved (page 10-5), it should be noted that the current
Airport Layout Plan (ALP) for IAD dated February 2003 does include a rail
alignment and a proposed rail yard on Airport property. Although the rail
alignment shown on the ALP in the area northeast of the Main Terminal differs
somewhat from that shown in the SDEIS, the Airports Authority is committed to
working with the Virginia Department of Rail and Public Transportation to
facilitate the FAA approvals necessary for the project.
AUG 27 2002

Mr. Corey W. Hill
Northern Virginia Regional Manager
Commonwealth of Virginia
Department of Rail and Public Transportation
1550 Wilson Boulevard, Suite 300
Arlington, VA 22209

Re: Draft Environmental Impact Statement
Dulles Corridor Rapid Transit Project

Dear Mr. Hill:

On behalf of the Metropolitan Washington Airports Authority (Airports Authority), I am pleased to provide support for the Dulles Corridor Rapid Transit Project and comment on the Draft Environmental Impact Statement. The Airports Authority has a very strong interest in providing the best possible access to Washington Dulles International Airport (Dulles) from throughout the Washington metropolitan region. Since the inception of Dulles more than 40 years ago, access has been a primary consideration as evidenced by the dedicated Dulles Corridor. The Federal Aviation Administration and subsequently the Airports Authority have planned for, acquired, and protected the median of the Dulles International Airport Access Highway (DIAAH) for the specific use of rail to Dulles.

Dulles continues to grow as a major international airport and the Airports Authority has not wavered in its vision to have a rail connection to the Nation’s Capital. As part of that vision the Airports Authority supports the Draft Environmental Impact Statement alternatives that utilize the median of the DIAAH for rail, including phased implementation that provides for rail on a reasonable, predictable schedule. The Airports Authority recognizes that BRT could well be a part of such a phasing strategy. We do not, however, believe that BRT has the capacity to meet the long term needs of the region and the future growth of Dulles, and thus do not support it as a long-term solution to the corridor’s transit needs.

The Airports Authority, as stewards of the Dulles Corridor, has an interest in optimizing the throughput of the corridor while maintaining access to Dulles. Accordingly, the Airports Authority would like to emphasize our future plans to widen the DIAAH to six lanes and the need for the Dulles Corridor Rapid Transit Project not to infringe on the right-of-way for this future widening. Also as we see a majority of this rail extension serving commuters, we have some concern whether adequate parking is being planned for in this project. The Airports Authority is prepared to make reasonable accommodations for commuters and commuter parking on airport property in the form of
the BRT maintenance facility, the Dulles North Transit Center, and future parking accommodations at the Route 606 Station. We are willing to consider siting the rail inspection and maintenance facility on Airport property provided there are no other reasonable and prudent alternatives. However, these regional commuter accommodations proposed on Dulles property represent the upper limit of what the Airports Authority may be willing to accept. To help realize the full potential of this rail extension, accommodations for additional parking beyond what is proposed in the draft EIS should be further considered.

As part of our review of the Draft Environmental Impact Statement we have prepared a list of more specific comments related to proposed facilities at Dulles. This list is offered as Attachment 1 for consideration as the project proceeds into further stages of development.

In conclusion, the Airports Authority supports rail in the Dulles Corridor, and is prepared to continue to help fulfill the vision created more than 40 years ago when Dulles was built.

Sincerely,

James A. Wilding
President and Chief Executive Officer

attachment

cc: J. Kenneth Klinge, CTB
Leo J. Bevon, VDRPT
Richard White, John Dittmeier, WMATA
Anthony Griffin, Fairfax County
Kirby Bowers, Loudoun County
Terry J. Page, FAA Washington Airports District Office

JAW:pp
ATTACHMENT 1

Specific Comments on Draft Environmental Impact Statement (DEIS)

The Metropolitan Washington Airports Authority (Airports Authority) offers the following comments on the DEIS:

- The source of the IAD passenger projections for air travel presented in DEIS Section 1.2.2.4 needs to be identified. The figures do not agree with MWAA’s unconstrained projections of passenger activity, which have been reviewed and approved by FAA. MWAA projects 37.9 million annual passengers (MAP) for 2010 and a build-out scenario of 65.7 MAP. Note that the term “million annual passengers” includes the sum of enplanements and deplanements, not simply “boardings” as stated in the DEIS.

- DEIS Section 3.4.3 on visual and aesthetic effects indicates that views of the IAD tower and Main Terminal from the Dulles International Airport Access Highway (DIAAH) would not be blocked by the east rail portal or by traction power substations; however, the DEIS does not discuss whether views would be affected by fencing or other barriers in the DIAAH median, particularly near Sully Road.

- The eligible historic district at IAD is substantially larger than that shown in Figure 7.3-1b, and includes the proposed location of the rail tunnel portal and elevated track northwest of the Main Terminal. The effects of these structures need to be addressed in the context of cultural resources and the Section 4(f) evaluation.

- As the development of the IAD Metrorail station would occur below grade, it would not have direct visual impact on the Main Terminal or historic district; however, this new facility would still technically fall within the historic district and the architectural design would need to take into account the general historic character of the airport. The original Saarinen plan included a careful consideration of both the inbound and outbound “passenger experience”. As the new facility will become a new element of that experience, architectural sensitivity to the character of the airport will need to be addressed. Further consultation with the Airports Authority and the review agencies (under the terms of a Programmatic Memorandum of Agreement) would be required to assess potential effects and develop mitigation measures (if required).

- DEIS Figure 2.3-15 indicates the potential location of four traction power substations on airport property. Although it appears that two of these would be located in the north airport, one would be in the vicinity of the Main Terminal and one along the DIAAH. In both these locations, the site selection and facility design will need to take into account potential visual impact on views of the Main Terminal complex and the architectural character of the historic district. It is anticipated that the MWAA Design Manual would dictate the design treatment in order to assure compatibility with the airport’s other service structures.
DEIS Section 4.2.3.5 states that the project is not in the coastal zone. It is our understanding that Fairfax County is part of the Virginia Coastal Zone, and that consistency with the Virginia Coastal Zone Management Plan should be addressed in the EIS.

**Coordination Needs**

Extensive continuing coordination is needed between the DCRTP design team and the Airports Authority throughout project design and construction to avoid potential conflicts between DCRTP and future IAD projects, and to minimize disruption during construction. The following is a list of technical comments related to the rail alignment, which the Airports Authority expects the project to address in the preliminary engineering stage:

- Preliminary engineering for this project should study the widening of the Dulles Airport Access Highway (DAAH) to six lanes in sufficient enough detail to determine what accommodations will be required to allow both projects to be accomplished.

- The western portal at station 1681+00 blocks ingress/egress to the Dulles Marriott Hotel and to Navigation Road at 1685+50. Consideration should be given to either relocating the portal further north or relocating Navigation Road and the Marriott access.

- The Airports Authority intends on preserving the right-of-way for future underground pedestrian connections to the Terminal from the vehicle parking north of the Terminal to remove pedestrian-vehicle conflicts and increase capacity of the commercial vehicle road. This pedestrian connection would be similar to the pedestrian connection that this project proposes to use for rail passengers to gain access to the Terminal. The current plans do not provide sufficient detail but it appears that the east portion of the Dulles Station and the #10 double crossover do not allow sufficient clearance between existing grade and the top of the station structure for the pedestrian connection to cross over the top of the station.

- The Airports Authority’s expectation, though not specified in the documents, is that between both portals and the station, a tunneling construction method will be used which does not impact existing roads or facilities.

- Vertically, the Metrorail profile is in conflict with several of our proposed roadways, including EB-CD Rd., Ramp C and the entire Aviation Drive Ext./Rudder Rd. intersection. Each of these roadways have been set vertically to meet FAA airspace vertical clearances for Part 77 surfaces and proposed structures, so raising their profiles would not be feasible.

- The eastern portal at station 1590+00 is within the runway protection zone of runway 1R-19L. Accordingly, extensive coordination with the Airports Authority and FAA will be required and height restrictions will be imposed on cranes and equipment during construction.
The Airports Authority has not yet determined the best location for a BRT stop/station at the Terminal Building. Though the general plans call for three bus parking positions at the easternmost end of the commercial vehicle curb, the Airports Authority's desire is to further study the best location for a BRT facility if a BRT system becomes part of the locally preferred alternative.
AUG 10 2000

Mr. Leonard Alfredson, P.E.
Dulles Corridor Rapid Transit Project
1550 Wilson Blvd., Suite 300
Arlington, VA 22209

RE: Environmental Impact Statement (EIS) Scoping Comments

Dear Mr. Alfredson:

The Metropolitan Washington Airports Authority (Authority) endorses the proposed Dulles Corridor Rapid Transit Project. Activity and development in the Dulles vicinity -- commercial, residential, and aviation -- are clearly some of the fastest growing in the country, and in our case at the airport, in the world. Reliable transportation and efficient mobility for the Dulles Corridor is essential for all parties, and this proposed program offers our best hope.

At your invitation, we offer the following for the record as our scoping comments:

Transit System Concepts

At the public scoping meetings there were comments to the effect that the EIS should consider an alternative involving multiple rail stops at Washington Dulles International Airport (Dulles); e.g., one stop at the Terminal and an employee stop farther north. While it may be appropriate for the Bus Rapid Transit (BRT) concepts, the Authority believes there should be only one airport rail station at Dulles. The Authority has a shuttle bus system for circulation on airport grounds. Moreover, we are concerned that an excessive number of stops will increase travel time and discourage ridership.

Regarding the second BRT stop at the airport, we will continue to work with you to establish a location that optimizes ridership and convenience.

In terms of public comments received that an airport rail station should be remote from the terminal, we believe such arrangements will significantly cut airport ridership. This conclusion can be demonstrated by comparing airports with existing at-terminal stations to airports with remote stations, and is consistent with conventional transit wisdom. The Authority believes that the airport station should be immediately adjacent to the terminal.
Mr. Leonard Alfredson, P.E.
Dulles Corridor Rapid Transit Project
Page 2

Some ability to operate multiple routes on the rail line with different eastern termini is of interest. For example, interlacing trains going into and through the District of Columbia with trains that terminate in Tysons Corner or on the Virginia portion of the Orange Line may yield system benefits. This requires some turn-back such as would be provided in the Tysons "loop" concept.

We believe that the Route 606 station, on airport property offers the only politically acceptable location for a major commuter park-and-ride facility for the western portion of the rail alignment, and that such a facility is vital to the healthy operation and effectiveness of the Dulles Rail line. It is on this basis that the Authority has cooperated with the concept of such a station and the establishment of the Western Regional Park-and-Ride lot. There have been other competing visions that have surfaced for this station that threaten airport development and the efficacy of the rail system. The Authority is strongly opposed to these alternative proposals. Any concept that fails to deliver a minimum of 6,000 to 7,000 automobile parking spaces in relative proximity to a Route 606 Station will fail to meet our mutual interests for a station at this location. We are amenable to working with the study team in Preliminary Engineering to optimize the station location so as to maximize the parking potential. To ensure that this facility is used for commuter parking for rail transit through the Corridor, and not for additional remote airport parking on the transit community's dollar, we recommend a ban on overnight parking. These overnight prohibitions are in place at many existing park-and-ride facilities.

Transit Maintenance and Storage Facilities

Regarding the concept of a significant on-airport development for transit maintenance and storage functions, that concept has been previously explored and proves problematic for a number of reasons. From an airport perspective, availability of land in the northern areas of Dulles is constrained by a number of factors. First, FAA rules establish runway protection zones which include Object-Free Areas (OFA) alongside and at the ends of runways, and Runway Safety Areas outside the OFAs, within which buildings are prohibited.

Second, the Dulles Land Use Plan, which is part of the FAA-approved Airport Layout Plan, reserves all available land north and east of the Terminal for uses that are essential to operation of the airport. The Land Use Plan also identifies runway protection zones for future runways.

Third, much of the undeveloped land on Dulles that is not subject to these restrictions contains wetlands. Because of these constraints the Authority believes it is unlikely that a suitable site for the proposed BRT/rail maintenance yard can be found on airport property in convenient proximity to the rail alignment.
A number of rail operational considerations also make airport locations undesirable; expert opinion on these issues can be found from some of the other agencies and from the Major Investment Study (MIS) investigations.

**Environment – Visual Impacts**

The Dulles Terminal is eligible for listing on the National Register of Historic Places. The historic district associated with the Terminal includes nearly all of the developed portions of the airport property between the Terminal and the airport hotel. In addition, the extreme western portion of the Dulles Access Highway has certain provisions protecting viewsheds toward the terminal. However, the Authority does not see a conflict between the historic designation and the proposed project because the Access Highway median has long been intended for rail transit use.

**Terminal Area Facilities**

Implementation of BRT at Dulles needs to be coordinated with the Authority to maintain vehicle and pedestrian traffic flow at the Dulles curb. Severing the curb in prime locations to provide a secured corridor between pre-ticketed passengers and the vehicles they are boarding will be impractical to the remainder of our operation.

The placement of the proposed Dulles Airport Metrorail station and tunnel will need to be coordinated with underground facilities planned for the airport. The most critical of these is a pedestrian tunnel connecting the terminal building and a parking garage planned for the north flank of the parking “bowl.” This tunnel system is anticipated to be equipped with moving walkways. It is being designed to bridge open-cut construction for the rail station. The project, currently in advertisement for construction proposals, should be capable of allowing a three-track, two-platform station.

Consideration and provision for a future landside people mover is also a requirement at the Dulles rail station. Members of your team have graciously assisted us in developing a concept similar to that being built at San Francisco International Airport where the regional rail and the airport’s landside people mover are vertically stacked together. This means the elevation of the airport’s station will be lower than estimated in the MIS.

Regarding the construction of the rail station, we are very interested in any early information or opinion you can share regarding construction techniques and impacts anticipated for building the station immediately next to the terminal, and below this curb.
Other On-airport Facilities

The proposed rapid transit improvements need to be coordinated with the Authority’s program to improve the airport road network. The road improvements could affect the routing of buses under the BRT alternative and the placement of Metrorail tunnel portals.

The EIS should compare the impacts of tunneling vs. cut-and-cover Metrorail construction methods on Dulles Airport traffic and operations.

The issue of alternative rail alignments adjacent to the rental car companies should be easily resolved early in the EIS process. We can discuss this with you at the next convenient technical meeting.

The Access Highway and Toll Road Corridor

Contrary to some statements made by others in the course of the scoping meetings, only some of the proposed median station locations in Fairfax County have been provided “bubbles” in the course of the design and construction of the eight-lane Dulles Toll Road. We believe that at least one, and perhaps two, stations will require reworking the Dulles Toll Road in order to accommodate the expected stations. If we are correct, the most complicated and expensive location to adjust will be at the proposed Herndon/Monroe Station.

The Access Highway will be widened to six lanes, probably within the decade. Preliminary Engineering for rail will need to consider the Access Highway in its six-lane configuration, not in its present four-lane section.

We are interested in having the EIS state a vision for the portion of the median adjacent to Tysons Corner in which no rail is designated at this time. We believe it may be prudent to continue to protect for rail in the median between Route 123 and Route 7 for a future use beyond the proposed project.

Policy and criteria for noise and noise walls along the Dulles Corridor are unique. They have been established in various Dulles Connector and Toll Road projects over the years. The Authority will be pleased to assist you as you define impacts and mitigation actions.

The Dulles Airport property, including the Dulles Access Road and the Dulles Connector, is owned by the U.S. Government (Department of Transportation) and leased to the Metropolitan Washington Airports Authority. An easement from the Authority or similar agreement will be required for the proposed project.
Mr. Leonard Alfredson, P.E.
Dulles Corridor Rapid Transit Project
Page 5

The Authority is considering your invitation to serve as a cooperating agency in the preparation of the EIS. Our senior management will make a decision in this matter during the next few weeks. In the interim, we have designated Dr. Charles Baumer of our Planning Department as the Authority’s liaison with the Dulles Corridor Rapid Transit Project on the EIS. He can be reached at (703) 417-8168. Mr. Mike Hackett, also of Planning, will be our lead contact on Preliminary Engineering. His number is (703) 417-8164. Charlie and Mike will be each other’s alternate on their respective assignments.

If you need additional information, please feel free to contact me at (703) 417-8160. We look forward to working with you on this worthy endeavor.

Sincerely,

[Signature]

William C. Lebegern
Manager, Planning Department
K.2.2 National Capital Planning Commission

- February 23, 2004
- August 23, 2002
February 23, 2004

Mr. Karl Rohrer  
Project Manager  
Virginia Department of Rail and Public Transportation  
1550 Wilson Boulevard - Suite 300  
Arlington, VA 22209  

Re: Docket Number R03-6

Dear Mr. Rohrer:

The National Capital Planning Commission (NCPC) supports the efforts of the Washington Metropolitan Area Transit Authority (WMATA) and the Virginia Department of Rail and Public Transportation (VDRPT) to expand transit service in northern Virginia along the Dulles/Interstate-66 Corridor. As the central planning agency for the federal government in the National Capital Region, NCPC takes great interest not only in maintaining the quality of Federal development throughout the region, but also in preserving the quality of life for metropolitan area residents and visitors. We believe that reducing traffic congestion and improving air quality are major factors in enhancing regional quality of life, and that quality transit service is an important component of any solution to reach these goals.

The final preferred Metrorail extension to Dulles would greatly enhance general mobility within the Dulles/I-66 Corridor and provide an important regional transit linkage between Dulles Airport and the District of Columbia. The Public Hearings Report indicates that the Project Team will work with local governments to support and implement the Fairfax County and Loudoun County comprehensive plans, which contain guidelines to support transit, higher densities, mixed-use development, and pedestrian and bicycle friendly development patterns near transit stations. We are pleased that you share our vision of fostering transit-oriented development along the Dulles Corridor in order to ensure that future transit ridership is maximized. The comment responses contained in the Public Hearings Report show that the Project Team has been adequately responsive to our concerns regarding implementation of supportive station area transit-oriented development as part of the project.

We look forward to the release of the Final Environmental Impact Statement. Please let us know if we may be of any assistance to you in furthering this important project. If you have any questions regarding these comments, please direct them to Mr. Michael Weil, who may be reached at (202) 482-7253.

Sincerely,

[Signature]

William G. Dowd, P.E.  
Director, Plan and Project Implementation Division
IN REPLY REFER TO:
NCPC File No. 6287

AUG 23, 2002

Mr. Corey W. Hill
Northern Virginia Regional Manager
Virginia Department of Rail
and Pubic Transportation
1550 Wilson Boulevard, Suite 300
Arlington, Virginia 22209

Re: Comments on Dulles Corridor Rapid Transit Project Draft Environmental Impact Statement (DEIS)

Dear Mr. Hill:

Thank you for the opportunity to comment on the Dulles Corridor Rapid Transit Project DEIS. As the central planning agency for the federal government in the National Capital Region, the National Capital Planning Commission takes great interest in new transit projects in the region. In both its project review and planning roles, the Commission is focused strongly on smart growth and transit-oriented development. Our comments follow:

Whether the final preferred alternative is Bus Rapid Transit (BRT): Metrorail; a combination of BRT and Metrorail; or phased implementation, the project must include changes to land use policies and zoning that will support Transit-Oriented Development (TOD) in the project station areas. This should include higher allowable densities, a mix of uses, and compact walkable development patterns within a 1/2 mile radius of the stations. It is preferable that park and ride facilities not interfere with development of this area, particularly within the inner 1/4 mile radius around the station. This area is better suited to pedestrian-scale development patterns. If parking facilities are located within this area, they should not be placed between the station and the immediately surrounding development and are best placed below ground. BRT stations and stops should be designed as if they were rail stations.
Mr. Corey W. Hill
Page 2

For portions of the project that will lie in freeway medians, air rights above the freeway right-of-way should be transferred and developed so that walkable uses can be placed within ¼ and ½ mile radii of the stations. The project should also include the design of supporting transit services such as shuttle buses from neighborhoods to the transit corridor and from the transit corridor to work and shopping activity centers.

We look forward to the release of the Final Environmental Impact Statement. If you have any questions regarding these comments, please direct them to Mr. David Levy of our staff at (202) 482-7247.

Sincerely,

William G. Dowd, P.E.
Director, Office of Plans Review
K.2.3 Northern Virginia Regional Commission

- November 4, 2003
November 4, 2003

Mr. Karl Rohrer, Project Manager
Virginia Department of Rail and Public Transportation
1550 Wilson Boulevard, Suite 300
Arlington, VA 22209

Re: Dulles Corridor Rapid Transit Project Draft EIS

Dear Mr. Rohrer:

The Northern Virginia Regional Commission staff has reviewed the document described above and has the following comments.

Please be advised that Fairfax County and the Town of Herndon have enacted jurisdiction-wide Chesapeake Bay Resource Management Area (RMA) designation. This RMA designation requires that all development result in a no-net-increase standard for phosphorus loadings, based on the jurisdiction's average imperviousness.

Special attention should be given to post-construction stormwater quality management. The developing agency must adhere to the post-development water quality requirements set forth by the Virginia Stormwater Management Regulations (VR 215-02-00 Part IV and §2.3). Meeting the Virginia Stormwater Management Regulations should comply with the requirement that state agencies meet the local ordinances pursuant to the Virginia Chesapeake Bay Act.


We would also suggest that, where possible, opportunities for retrofit of existing stormwater quantity facilities to stormwater quality facilities through new construction activities should be explored. NVRC’s Guidebook for Maintaining BMPs in Northern Virginia is available, without charge, should you need it, and can also be downloaded from our website, or call me if you would like to receive a copy to use as a reference.

A copy of this letter should be included with your submission to indicate that the review by this agency has been completed.

Your cooperation in the intergovernmental review process is appreciated.

Sincerely yours,

[Signature]
James Van Zee
Director, Regional Planning Services
K.2.4 Northern Virginia Regional Park Authority

- December 18, 2003
- November 1, 2002
- August 28, 2002
- August 10, 2000
December 18, 2003

Karl A. Rohrer, AICP
Project Manager
Virginia Department of Rail and Public Transportation
1550 Wilson Boulevard, Suite 300
Arlington, VA 22209

RE: Dulles Corridor Rapid Transit Project Supplemental Draft Environmental Impact Statement

Dear Mr. Rohrer:

We have reviewed the Supplemental Draft EIS and offer the following comments related to the W&OD Railroad Regional Park.

Section 7.3
The Supplemental Draft EIS states that at the W&OD Railroad Regional Park, access to the park would be maintained during hours of peak use. As stated in previous comments on the Draft EIS, it is Park Authority policy and the intent of the Guidelines for the Development of W&OD Trail Bridge Crossings that the trail is to remain open and safe at all times during bridge construction. Overhead protection for the trail, phased construction across the park property, trail detours, and other safety features will be required as necessary. Also, please confirm that construction access to the Toll Road easement area will be along the Toll Road and not along the W&OD paved or gravel trails.

We look forward to working with you to ensure that the proposed trail bridge meets our design requirements and that the trail remains open and safe during construction. Thank you for the opportunity to comment.

Sincerely,

[Signature]

Daniel Iglhaut
Land Administration and Planning Specialist

Paul McCray, Manager, W&OD Railroad Regional Park

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November 1, 2002

Corey W. Hill  
Northern Virginia Regional Manager  
Virginia Department of Rail and Public Transportation  
1550 Wilson Boulevard, Suite 300  
Arlington, VA 22209

RE: Dulles Corridor Rapid Transit Project Public Hearings Report

Dear Mr. Hill:

We have reviewed the Public Hearings Report for the Dulles Corridor Rapid Transit Project Draft EIS and offer the following comment related to the W&OD Railroad Regional Park.

Section 7.3.2 states, “Any artificial lighting, which the Project might install, would be the maintenance responsibility of the park owners.” Since the artificial lighting is proposed as mitigation for the project’s negative visual and safety impacts on park property, its maintenance would be the responsibility of the project sponsor.

Thank you for the opportunity to comment. Please contact me at 703-359-4628 or at diglhalt@nvrpa.org if you have any questions or concerns.

Sincerely,

Daniel Iglhaut  
Land Administration and Planning Specialist

Paul McCray, Manager, W&OD Railroad Regional Park
August 28, 2002

Corey W. Hill
Northern Virginia Regional Manager
Virginia Department of Rail and Public Transportation
1550 Wilson Boulevard, Suite 300
Arlington, VA 22209

RE: Dulles Corridor Rapid Transit Project Draft Environmental Impact Statement

Dear Mr. Hill:

We have reviewed the Dulles Corridor Rapid Transit Project Draft EIS and offer the following comments related to the W&OD Railroad Regional Park.

Section 3.6.3.3
As stated in the Draft EIS, the planned widening of the Dulles Toll Road overpasses and the new bridge for Metrorail would nearly eliminate the existing light well between the existing overpasses resulting in "a visual impact to the trail." The Draft EIS states that the visual impact can be mitigated with the incorporation of natural and artificial lighting under the bridge. It should also be noted that elimination of the light well might result in safety and security impacts such as reduced visibility and crime. The Final EIS should address safety and security issues related to elimination of the light well and related mitigation, such as lighting and call boxes. Moreover, the Park Authority must be involved in the development of mitigation measures during all design phases.

Section 3.6.5.3
The Draft EIS states that construction would be timed for low-use periods and continued access to the park would be maintained during hours of peak use. The Draft EIS also states that construction would be in compliance with the Park Authority's Guidelines for the Development of W&OD Trail Bridge Crossings. It is Park Authority policy and the intent of the Guidelines that the trail is to remain open and safe at all times during bridge construction. Overhead protection for the trail, phased construction across the park property, trail detours, and other safety features will be required as necessary. Although not addressed in the Draft EIS, it is assumed that construction access to the Toll Road easement area will be along the Toll Road and not along the W&OD paved or gravel trails.

Section 7.4.3.12
As stated in the Draft EIS, the W&OD is a Section 6(f) protected property under the Land & Water Conservation Fund Act. In the early 1960's the federal government acquired an easement across the W&OD for the Toll Road overpass. However, rail uses do not appear to be included in the easement. Therefore, the Virginia Department of Conservation and Recreation has requested a determination from the National Park Service as to whether a conversion of use
would be required for construction of an additional overpass for Metrorail within the easement area. To date, a determination has not been made by the National Park Service. Therefore, the Draft EIS should not state, "no conversion of Section 6(f) land would occur." Regardless of whether or not a conversion is required, the Park Authority must review and approve, in writing, any new construction within the easement.

Thank you for the opportunity to comment. Please contact me at 703-359-4628 or diglhaut@nvrpa.org if you have any questions or concerns.

Sincerely,

[Signature]

Daniel Iglhaut
Land Administration and Planning Specialist

Jerry Cassidy, Virginia Department of Conservation and Recreation
Paul McCray, Manager, W&OD Railroad Regional Park
Derrick Bolton, Safety Officer, NVRPA
August 10, 2000

Len Alfredson
WMATA Project Manager
Dulles Corridor Rapid Transit Project
1550 Wilson Boulevard, Suite 300
Arlington, VA 22209

RE: PE/NEPA Scoping for Dulles Corridor Rapid Transit Project

Dear Mr. Alfredson:

We attended the pre-scoping session for the project and offer the following comments for consideration.

As you know, the Northern Virginia Regional Park Authority owns and operates the W&OD Railroad Regional Park. The 45-mile long park runs from Arlington County to Purcellville and is improved with multi-use trails within the former W&OD Railroad right-of-way. The W&OD provides an important recreational amenity for the region and a non-motorized transportation corridor that roughly parallels the Toll Road except where it crosses the Toll Road in Reston. Therefore, the Park Authority recommends that planners address connectivity from the proposed passenger stations to the W&OD for pedestrians and bicyclists.

The W&OD is a Section 6(f) protected property under the Land & Water Conservation Fund Act. In the early 1960's the federal government acquired an easement across the W&OD in Reston for the Dulles Toll Road overpass. Rail uses do not appear to be included in the easement. In the event the proposed rail line is established within the Toll Road, it may be necessary for the project sponsor to acquire additional easement rights from the Park Authority. Granting these rights may constitute a "conversion of use" under Section 6(f). A conversion of use would also be required if additional right-of-way is required within the W&OD.

The Park Authority also owns and operates Meadowlark Gardens Regional Park on Beulah Road near the Town of Vienna and Brambleton Regional Park near Beaverdam Reservoir in Loudoun County. Also, the Park authority is the state appointed administrator assisting the Goose Creek Scenic River Advisory Board to oversee activities along Goose Creek. Although it does not appear that the project will impact these resources, the Park Authority may have concerns if the proposed rail line is relocated outside the existing Toll Road right-of-way.
Thank you for the opportunity to comment. Please keep us informed as the study continues and contact me at (703) 359-4628 or diglhaut@nvrpa.org if you have any questions or concerns. We will be happy to meet with you as the planning process advances.

Sincerely,

[Signature]

Daniel Iglhaut
Land Administration and Planning Specialist
K.3 STATE
K.3.1 Commonwealth of Virginia, House of Delegates

- Verbal Testimony at December 2003 Public Hearings (The Honorable Jim Scott)
- Verbal Testimony at December 2003 Public Hearings (The Honorable Kenneth R. Plum)
- August 26, 2002
- Verbal Testimony at July 2002 Public Hearings (The Honorable Kenneth R. Plum)
- Verbal Testimony at July 2002 Public Hearings (The Honorable Kenneth R. Plum)
- Verbal Testimony at July 2002 Public Hearings (The Honorable Kenneth R. Plum)
- July 22, 2002
MR. KLINGE: Thank you, Delegate Plum.

Next is Delegate Jim Scott.

MR. SCOTT: Thank you, Mr. Chairman, Madame Chairman, Supervisor Kaufman. It is a pleasure to be with you tonight. I am here wearing two hats. The first is representing the 53rd Legislative District which includes the West Falls Church and Dunloring Stations on the Orange Line and also representing the committee known as the House Joint Resolution 273 Committee which, as some of you know, is authorized by the General Assembly to begin work on interim improvements between now and then and the time of rail construction to the Tysons area.

I am also here tonight to ask you to listen carefully to constituents from the 53rd Legislative District, particularly those of two or three folks whom you have heard from before. I want to draw your attention particularly to the remarks of Mr. Clark Tyler from the Hallcrest Heights Civic Association whose concerns in support of the extension of rail to Dulles have to do with
the location of his community and the need for sound-mitigation measures which you have heard about on a number of occasions and I am grateful to say that Director Karen Ray has indicated that she will be addressing, through a coordinated effort on the part of the Commonwealth of Virginia and the other agencies.

Secondly, you will be hearing, I think, from Francesca Bravo who is the President of the West Hampton Civic Association who has made some comments about the revised EIS and will be addressing you, I believe, this evening. I think you have already received her remarks but, in case you haven't, I have a copy available for you.

Maybe a note of history might be useful tonight. Some of you realize that I was representing the Providence District when the Orange Line opened in 1986. It was actually my last official action as Providence Supervisor, as Chairman Hanley will recall. Before that took place, there were a lot of people who felt that it was not going to happen. There were a lot of
people who felt it shouldn't happen. There were a lot of people who were convinced it was happening in the wrong place.

But I draw your attention to the results. The Orange Line is now one of the most successful lines in the Metro system. There were people who suggested that the Vienna Station would never come about and, as a matter of fact, all we needed was buses down the Route 66 Corridor to solve all of our transportation problems.

We have seen that that was not the case then and I don't think it is the case now. I hope that you will not take temporary setbacks to mean anything but temporary setbacks and, in light of what has happened in the past, I am certain that you will be able to move this project forward as it deserves to be moved forward as one of our top priority projects for the addressing of our congestion problems in Fairfax County and in Northern Virginia.

Some final remarks in addition to calling your attention to the other speakers, I always try
to say that it is very important in each of my statements to remind those who will listen that non-motorized access to Metro stations remains a very high priority for not only my constituents but also for me, and I hope you will keep that in mind as you move forward with this project.

Finally, I want to just quote from a letter written to Mr. Rohrer from Ms. Francesca Bravo about the project, a very supportive letter but one which draws attention to the need for some additional mitigation measures, and I quote; "There is no need to sacrifice the community for the greater good. With proper planning and coordination between agencies, this can be a win-win for all. In the context of a $3 billion rail and a $13 million Park-and-Ride facility, it seems that minor investment in sound walls, signs, speed bumps, to mitigate sound and visual pollution in traffic for adjacent areas is a small price to pay for community safety, health and good will."

Thank you very much.

MR. KLINGE: Thank you, Mr. Scott.

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WASHINGTON, D.C. 20003
(202) 546-6666
about it, but I think that, as we address those concerns, I hope that we will be able to complete our commitment that we made when we supported the local preferred alternative in the Corridor.

I would like to a moment, in that you have indicated that public officials have ten minutes; the Reston Association is a homeowner association of over 50,000 people. Susie Jones is here to able to incorporate as much time as possible for her to provide her testimony.

Thank you very much.

MS. HANLEY: Thank you.

MR. KLINGE: Thank you. Next is Delegate Ken Plum.

MR. PLUM: Thank you very much and good evening. My name is Kenneth Plum. I welcome you to my neighborhood. I live two blocks down the street at 2073 Cobblestone Lane, Reston. I speak to you tonight as a member of the Virginia House of Delegates representing the 36th District but I also speak as Chairman of the Dulles Corridor Rail
Association. My remarks will be directed to the Supplemental Draft Environmental Impact Statement but I also want to just, by way of introduction, say a few comments about the project in general.

What I would want to say to you is that the Dulles Corridor project is very much alive in the hearts and minds and commuters in this region. The need for the project increases daily. You have the well-documented figures of the need already in the EIS. But those aren't just numbers. They are men and women trying to get to work each morning and they are people who are still out on the toll road tonight trying to get home to their dinner and to their families.

The choice of rail as the Locally Preferred Alternative was correct when it was made and the wisdom of that choice becomes even more clear as economic prosperity returns to the Corridor. Make no mistake; economic prosperity is returning to the Corridor.

But beyond rail as the Locally Preferred Alternative, I know I speak on behalf of the
citizens in my area who ask that we build Dulles Rail now. The Dulles Corridor Rail Association organized 20 groups as diverse as the Washington Board of Trade and the Sierra Club, the AAA and League of Women Voters, to say that we support Dulles Rail now. I will enter into your record the list of those 20 organizations.

But while tonight we are talking about the Supplemental Draft Environmental Impact Statement as a way to get Dulles Rail now, I would request that it be handled with all possible dispatch. Dulles Corridor Rail recognizes and acknowledges the necessity by the federal funding limitations and by the funding cycle that the project funding be done in phases.

We are pleased that the first phase of funding brings rail into the Corridor. We support that phase of funding as you have proposed in the Supplemental Draft EIS. We ask, however, that the funding phases not affect the construction schedule. In that regard, we request that the preliminary engineering be done for the entire
project and that the phasing of the financing be seamless in order that the construction be seamless.

The Dulles Corridor Rail Association supports a 23.1-mile project. As money becomes available for funding, the management of those funds and the planning for them to ensure that project--need to be done so that the project is built from the Orange Line to Route 772 in Loudoun as a seamless project.

In other words, make it clear that you do not intend to build to Wiehle and, at some later date, decide to finish the project. My hope is that when we go to the opening of the site at Wiehle that we are able to look west and see that, in fact, the construction is proceeding forward.

Delays in attempts to phase the construction would only add to its cost and would confuse the design and application of the stations. What I am saying to you, in other words, is that we recognize the reality. We are going to have to finance this thing in phases, but let's make sure
that those financing phases work together in a seamless fashion to that, in fact, construction can follow as well.

DCRA believes that the areas around the station should be left to local land-use decisions. Likewise, any designs around the station should involve a broad complement of the community actively involved in the design process. We have seen, I think, in the past, the wisdom of that community involvement.

To say that this is a very complex project is an oversimplification. It must go forward for the citizens of this region. But, just as the Supplemental EIS has worked out many design issues, so I know that the negotiations and actions over the next several weeks will make the project also financially viable.

We are pleased to support the Supplemental EIS and look forward to working with you in accomplishing that first phase of financing and construction and the total 23.1 miles.

Thank you very much.
August 26, 2002

Mr. Corey W. Hill
Northern Virginia Regional Manager
Virginia Department of Rail and
Public Transportation
1550 Wilson Boulevard, Suite 300
Arlington, Virginia 22209

Re: Draft Environmental Impact Statement and Proposed
General Plans for the Dulles Corridor Rapid Transit Project

Dear Mr. Hill:

I am pleased to comment on the Draft Environmental Impact Statement and
the Proposed General Plans for the Dulles Corridor Rapid Transit Project.

Unfortunately, I had to be out of town and was therefore unable to attend the
public hearings on July 29-31. However, I was represented by my
legislative aide, and I have reviewed testimony presented during the
hearings.

Mass transit to Tysons Corner and to Dulles Airport is overdue. It is
essential to the continued economic health of the region. It should be the top
priority among major unfunded projects in the region.

Fortunately, there seems to be consensus that the necessary state, local and
federal funding, along with substantial private funding, must be found to
move the project to construction as soon as possible. Two important funding
sources are within reach. Thanks to the initiative of the business community,
LEADER has been created to help provide private funding. Governor
Warner’s leadership has put full funding for the local share before the voters
this fall as a part of the sales tax referendum.
Now we must move promptly to the next stage: selection of route and mode alternatives. Toward that end, I commend and support the work of the Dulles Rail Now!, the McLean Citizens’ Association and Hallcrest Heights. I agree with their positions. I particularly call your attention to the MCA statement for its thoroughness in highlighting the importance of pedestrian and bus access to the Tysons’ stations, as well as the need to mitigate the impact of construction and system noise on nearby communities and businesses. Ease of access by pedestrians, buses and bicyclists, including conformance with Fairfax County’s County-wide Trail Plan, will be important measures of the success of our planning and implementation of this critical link in our transportation network.

In addition, I want to call your attention to the analysis and statements of one of MCA’s constituent organizations: Hallcrest Heights, as well as citizens living in the Westhampton area. Their very legitimate concerns about immediate and long-term noise impacts deserve careful and prompt attention. Attached is a copy of a letter dated, August 21, 2002, from Mr. Clark Tyler. That letter details his community’s concern about noise from construction and from transit operations. I concur with Mr. Tyler’s request that Hallcrest Heights should receive the same level of noise attention measures as nearby communities adjacent to the Dulles Airport Access Road have already received. I also agree with his suggestion that noise attenuation measures to address the concerns of Hallcrest Heights and the Westhampton area citizens should be initiated before the construction of transit operations facilities. Please advise me of your plans in this regard.

Thank you for the opportunity to submit these comments for the record.

Sincerely Yours,

James M. Scott

cc: John Foust, MCA
    Clark Tyler, Hallcrest Heights
    Cathy Melton, Westhampton area
21 August 2002

Mr. Corey W. Hill
Northern Virginia Regional Manager
VA Dept. of Rail and Public Transportation
1550 Wilson Blvd., suite 300
Arlington, VA 22209

RE: Hearing No. 147, Docket R02-1

Dear Mr. Hill:

I wish to add to a statement I submitted earlier at the Public Hearing on July 29. Since that time, the Transportation Committee (which I chair) of the McLean Citizens Association has passed and sent to you a resolution and extended comments on the Dulles Corridor EIS. One of the issues that came up during this process concerned not only the criteria for noise abatement at Hallcrest Heights, but the prospect of construction noise, whichever rail option is selected.

On these issues there are three points that we feel the EIS needs to more substantively address:

1. VDOT's noise criteria were judged not to apply because "no other roadway changes affecting either capacity or elevation are expected." This is a narrow and not totally accurate viewpoint since both VDOT traffic projections and expectation for increased vehicle usage stemming from density allowances, will substantially increase traffic in the Dulles Connector section that adjoins our community. The EIS references plans to widen the connector, giving further indication of the prospect of increased vehicular traffic. The EIS should broaden its noise abatement scope to include both MWAA and VDOT policy as well as that of the FTA.

2. In light of #1 above, the EIS further references local ordinances on noise, but again narrowly excludes transit operations. The Policy Plan for the Comprehensive Plan of Fairfax County has as its objective (number 5): "Minimize human exposure to unhealthful levels of transportation generated noise." It makes no distinction between vehicular and transit generated noise. In fact the local ordinance regulates new development, to ensure that people are protected from "transportation noise," and that noise impacts in areas of existing development should be reduced. The EIS needs to address noise mitigation in this light.

3. Although specifics are not given in the EIS, it is not hard to judge from precedents in other elevated sections of the Metro system, that construction noise will be considerable. Since our community lies some 10-12 feet below the level of the roadway in the corridor, the construction of the elevated and curving section of the proposed rail service into Tysons, will involve substantial and sustained construction noise over an extended period of time. Given the
FTA's policy of coordinated transportation planning (which I assume would include dealing with such public agencies as MWAA and VDOT), the EIS should sequence significant transportation noise mitigation measures in the corridor (and particularly our adjoining section) ahead of construction activities. Since VDOT has chosen not only to not maintain the existing ineffective barrier,( which is too low and too short anyway), and since MWAA has said that they will not retrofit any communities for such abatement, the EIS should address the problem in a comprehensive way if the project's objective to protect adjoining communities has any meaning at all. If the EIS were to include such analysis, then a noise barrier of modern design equivalent to that erected for Wolf Trap and other communities in the corridor should be placed at our section of the corridor. Such a barrier must extend all the way down the off-ramp to the merge with Route 123 if it is to have any effect at all.

Thank you for considering these additional points for inclusion in the record of decision for the Final EIS.

Sincerely,

[Signature]

Clark Tyler
President
only make congestion much worse. We cannot afford to be a victim of our own success. We cannot let the high quality of life that’s attracted so many of us and the jobs to Fairfax County in the first place be undermined by that traffic congestion. We are on the verge of making the long-awaited vision of rail service to Tysons on the way to Dulles a reality. The time to take bold steps to solve the transportation problems has arrived, Mr. Chairman. Fairfax County and the Washington, D.C. region cannot afford to wait any longer.

Thank you.

[Applause.]

MR. KLINGE: The next speaker is the Honorable Kenneth R. Plum, member of the House of Delegates from Reston.

STATEMENT OF KENNETH R. PLUM

MR. PLUM: Mr. Chairman, members of the panel, I am here in three capacities. One is elected member of the Virginia House of Delegates representing the 36th District; secondly, as the convener of the Dulles Rail Now Coalition; and
third, chair of the Dulles Corridor Rail Association.

Let me first say in terms of the Dulles Rail Now Coalition, a coalition made up of AAA, Mid Atlantic, American Lung Association of Virginia, Coalition for Smarter Growth, Committee for Dulles, Dulles Area Transportation Association, Dulles Corridor Rail Association, Herndon-Dulles Chamber of Commerce, Leader Link National Wildlife Federation, Reston Association, Reston Citizens Association, Reston Interfaith Sierra Club, the Greater Washington Board of Trade, Washington Airports Task Force.

We, the organizations just mentioned, having studied the alternatives analyzed in the draft environmental impact statement of the Dulles corridor rapid transit project, recommend that the Commonwealth of Virginia select as a locally preferred alternative the rail option that produces the most ridership and has the most flexibility for increasing ridership in the future. To optimize ridership, continuing planning efforts should focus...
on improving station access and transit-oriented development around the stations.

While we are testifying at the hearings on issues of particular concern to our individual organizations, we are united in our support of bringing rail transit to a corridor of the region that is second only to the District of Columbia in terms of employment and contains several major activity centers.

Rail would serve Tysons Corner and is able to accommodate the projected growth in corridor transit trips. The coalition supports rail now. We will work with the region’s elected leadership to bring rail to the Dulles corridor by 2010, sooner if feasible.

Now turning to my role a chair of the Dulles Corridor Rail Association, DCRA has been advocates for rail since we were organized four years in August of 1998. The analyses that have been done as part of the work preparing the draft EIS and the facts that emerged about the alternatives under study support our goal of seeing
rail adopted as the locally preferred alternative.

We urge the Commonwealth to reach agreement with the Dulles transit partners, the private sector team, to engineer and complete construction of the entire rail system as quickly as possible.

I will highlight just a couple of the major reasons why I say we should move forward with rail now.

First and foremost is the tremendous impact on the quality of life that rail transit will have for residents and employees in the corridor. People will be able to choose to take high quality, efficient rail transit service long envisioned for the corridor. Rail transit will enhance mobility and access to jobs and to cultural and educational facilities throughout the region. By providing a high capacity alternative to the single-occupant vehicle, we can use incentives in transportation measures to reduce vehicle miles of travel and improve air and water quality, a particularly important objective now.
Development in the corridor has proceeded more quickly than forecast. Twice as many jobs were created in the Dulles corridor as in the rest of the region over the last decade, fueling construction of office space.

Regional forecasts indicate that the corridor will continue to grow at nearly double the rate of the rest of the region in employment and residents, adding 206,000 people, an increase of 56 percent, and 203,000 jobs, a 71 percent increase in employment levels, over the next 25 years.

While vacancy rates and office space are high now, there is no doubt in my mind that this region will see the energy and entrepreneurship of our local business community lead us into new and promising directions that we will see business form and grow.

Another major reason for our support of rail in the corridor is the opportunity it provides to use transient-oriented development to create attractive neighborhoods and communities with a pedestrian focus, the kind of planning that has
made much of Reston a model of community scale development for the rest of the world.

Transit-oriented development provides opportunities to develop a variety of housing types for an increasingly diverse population and to reduce household expenditures on transportation.

A well-planned and mixed use in close proximity to the station is the key to generating rail ridership. To optimize ridership, we urge that the engineering studies for the station take into account the potential for air rights development as well.

With the addition of a fourth runway and other major airport improvements and passenger amenities, Washington Dulles International Airport is poised for significant growth. Forecasts for passenger trips for 2010 have been increased from 30 million to 37 million, an increase of more than 20 percent. Forecasts for 2025 have been increased from 55 to 63 million passenger trips.

The Dulles Center of the National Air and Space Museum will open in December 2003 and is
expected to generate three to five million visitors per year. While these visitors should be able to use transit, the growth of jobs in the hotel and restaurant and service industries will also bring additional employees and visitors to the area who could benefit from rail transit.

The rail alternative is projected to carry 9600 passengers per hour, compared with 2370 for bus rapid transit. Rail, with the ability to carry 50 to 60,000 passengers per hour, has the capacity over the long term to serve the growing trip demands in the corridor.

While the bus rapid transit alternative described in the draft EIS has a number of serious limitations, we think that there can and should be significant improvements to express bus service and passenger amenities in the interim, including the use of technology to enable prepayment before boarding, real time information about the location of buses, and more neighborhood and circular services.

We also suggest that with the adoption of
rail as the locally preferred alternative that the counties move forward with station access planning to ensure that station area development provides an enhanced bicycle and pedestrian access facility as well as feeder bus services.

The engineering for rail should allow for future air rights development. And finally, the final financial plan for using toll road revenues provides the opportunity to explore several innovative pricing strategies, including incentives to switch to the fast toll transponder to improve roadway capacity, high occupancy toll lanes, whereby single drivers can use the hot lanes for a price, the cost of which is determined by a pricing structure that controls congestion.

Let the record show that before the yellow light came on, I completed my testimony, and for those reasons, we recommend the adoption of the rail option.

Thank you, Mr. Chairman.

[Applause.]

MS. KAUFFMAN: Thank you, Delegate Plum.
McCandlish at the registration table at this time so that we can accommodate you.

If you wish to provide comments and do not want to speak at tonight's hearing, I encourage you to fill out the comment form, write us a letter, or send us an e-mail. We will be accepting comments until the public comment period closes on August the 28th.

And as we said earlier, if you want to testify and not have to hang around, we have a court reporter outside who will take your testimony and that becomes part of the public record.

And I shall now introduce the public officials who are here to testify and each will get 10 minutes to speak.

The first speaker is the Honorable Kenneth R. Plum.

STATEMENT OF THE HONORABLE KENNETH R. PLUM

MR. PLUM: Thank you very much, Mr. Chairman, members of the panel, ladies and gentlemen. My name is Kenneth R. Plum. I live two blocks down the street at 2073 Cobblestone Lane
here in Reston.

I don't intend to take my full 10 minutes, so everyone can relax.

I am here to speak as an elected official representing this community in the Virginia House of Delegates. I am also here to speak as a convener of a coalition and also as chair of the Dulles Corridor Rail Association.

You are aware that yesterday we announced -- and I want to make the public here aware -- that we announced yesterday the convening of a coalition called Dulles Rail Now. That coalition is made up of the following organizations:

Triple AA Mid-Atlantic, American Lung Association of Virginia, the Coalition for Smarter Growth, the Committee for Dulles, the Dulles Area Transportation Association, the Dulles Corridor Rail Association, Herndon-Dulles Chamber of Commerce, LEADER, LINK, the National Wildlife Federation, the Reston Association, Reston Citizens Association, Reston Interfaith, Sierra Club, the Greater Washington Board of Trade, the Washington
Airports Task Force.

The organizations I have just listed issued a statement yesterday saying that having studied the alternatives analyzed in the draft environmental impact statement of the Dulles corridor rapid transit project, recommends that the Commonwealth of Virginia select as the locally preferred alternative the rail option that produces the most ridership and has the most flexibility for increasing ridership in the future.

While we may, speaking of the organizations that I have listed, testify at the hearings on issues of particular concern to our individual organizations, we are united in our support of bringing rail transit to a corridor of the region that is second only to the District of Columbia in terms of employment and contains several major activity centers.

The statement goes on to say the coalition supports rail now. We will work with the region's elected leadership to bring rail to the Dulles corridor by 2010, sooner if feasible.
Turning now to my statement as chair of the Dulles Corridor Rail Association, I know that you heard at the public hearing last evening and will probably hear some say again tonight, why are we in such a hurry on this project?

Well, I would say to you as someone who has worked on the project for more than 25 years, I would ask why has it taken so long?

The truth of the matter is the concept of this project goes back some 40 years. In the last several years there has been an active history of public involvement, studies by professionals and others, to bring us to this very pivotal point. And this is a pivotal point, I think, for the project and for the quality of life of our community.

We have problems to solve and they include, among other things, congestion, air quality, growth. But we want to, I would suggest to you, simply not solve these problems for today, we want to solve them for the long-term future.

I would say to you that I speak today also
in another capacity, in that of being a grandfather. My son Christopher, sitting here on the front row, and I want us to solve the problems not simply for me and for us today, but for Christopher and the other people who will live in our communities in the future.

Furthermore, as a public official, I know we all share the interest that we get the maximum value for the public monies we spend. We don't want to in the short run simply be cheap. Cheap such that we make a solution today and we have to multiply that in the future. In the long run we have ended up spending more money, inconvenienced a number of people. We need to go forward with a working solution for the long run.

The Dulles Corridor Rail Association recommends the rail option now. It responds to our needs today, but most importantly, it provides a key element for a quality future for our communities in the corridor.

Rail enhances our mobility in the corridor and eases access to jobs, but it also, and I think
Importantly, opens the region to a myriad of cultural and educational programs that are available throughout the area.

Rail also responds to the phenomenal growth expected in this corridor; 56 percent in population and 71 percent in employment by 2025. With a capacity to carry 50 to 60,000 passengers maximum per hour, rail can in the future not simply meet the needs of today, but it can meet the needs of tomorrow.

Rail will help us meet the needs of a rapidly expanding Dulles airport, where passenger trips forecast for 2010 have been increased from 30 million to 37 million.

Rail will help meet the demands of the National Air and Space Museum, which is expected to generate 3 to 5 million visits per year.

Local governments are to be complimented for the express bus system it has put in place. It is a form of bus rapid transit. It should be increased and enhanced. But future plans should be directed to the rail alternative, using express bus
in the interim.

Likewise, future planning needs to build upon the pioneering work already completed in Fairfax and Loudoun Counties to amend their comprehensive plans. That planning calls for rail stations with maximum access and flexibility for riders and transit-oriented development around the stations.

But for the decision before us tonight, that decision being the locally preferred alternative, the Dulles Corridor Rail recommends that we move to rail now.

Finally, I would ask that the record indicate that I used four minutes and 22 seconds of my 10 minutes.

Thank you.

MR. KLINGE: Thank you.

[Applause.]

MR. KLINGE: Now I'd like to introduce the mayor of the city of Falls Church, the Honorable Daniel E. Gardner.

STATEMENT OF THE HONORABLE DANIEL E. GARDNER
registration table at this time so that we can accommodate you.

If you wish to provide comments and do not want to speak at tonight's hearing, I encourage you to fill out a comment form, write us a letter, or send us an e-mail. We will be accepting comments until the public comment period closes at 5 p.m. on August the 28th.

I would also remind you that we have a court reporter in the hall who can take your statement if you so choose.

I shall now introduce the public officials here present to testify. They will each have 10 minutes to speak, and the first is the Honorable Kenneth R. Plum, member of the Virginia House of Delegates and chairman of the Dulles Corridor Rail Association.

STATEMENT OF THE HONORABLE KENNETH R. PLUM

MR. PLUM: Thank you, Mr. Chairman, and distinguished panel, ladies and gentlemen.

I want to start by thanking the panel for indulging me at the last two public hearings for
the last two evenings, and I will be brief tonight. But I also want to take a moment to thank you for the very professional manner in which these hearings have been conducted, the support that you have given to the public to understand what the questions are before us, the accommodations, aside from the air conditioning last evening, which no one had planned on. We have had, I think, a very successful series of hearings. Again, my thanks and my compliments to you for that.

I am here again this evening because I want to make sure my message is very clear. I am an elected official involved in the study of this project in various forms for almost 25 years. I come to you tonight as an elected official saying that from my studies and my conclusions, looking at the alternatives proposed, I recommend that we choose as the locally preferred alternative the rail option.

Likewise, as an organizer with others of the Dulles Rail Coalition Now, I want to bring to you a statement brought forth by a number of
organizations supporting again the rail option.

And finally, as Mr. Klinge had mentioned, I chair a group called the Dulles Corridor Rail Association, and likewise our analysis says that we should go to the rail option.

Back just a moment to the Dulles Rail Now Coalition, that coalition is made up of the following organizations:

Triple AAA Mid Atlantic, the American Lung Association of Virginia, the Coalition for Smarter Growth, the Committee for Dulles, Dulles Area Transit Transportation Association, Dulles Corridor Rail Association, the Herndon-Dulles Chamber of Commerce, LEADER, LINK, the National Wildlife Federation, Reston Association, Reston Citizens Association, Reston Interfaith, Sierra Club, the Greater Washington Board of Trade, the Washington Airports Task Force.

Because this is a statement bringing together many diverse groups, I am going to ask you to indulge me again for just a couple of seconds as I read through the prepared statement. The
organizations I have just listed have studied the alternatives analyzed in the draft environmental impact statement of the Dulles corridor rapid transit project, and recommend that the Commonwealth of Virginia select as the locally preferred alternative the rail option that produces the most ridership and has the most flexibility for increasing ridership in the future.

While the organizations in the coalition will testify at the hearings on issues of particular concern to our individual organizations, we are united in our support of bringing rail transit to the corridor of the region that is second only to the District of Columbia in terms of employment, and contains several major activity centers.

We applaud Fairfax and Loudoun Counties for adopting comprehensive plans in 2001 that support increased mixed use development around the rail stations.

We recognize that much work needs to be done to realize the walkable mixed use communities
envisioned by the transit-oriented development criteria in the plans and to make the rail extension a reality.

We support rail now. We will work with the region's elected leadership to bring rail to the Dulles corridor by 2010, sooner if feasible.

Then in my capacity as chairman of the Dulles Corridor Rail Association, as I indicated, we are a membership organization made up of business and community leaders. We likewise have looked at the alternatives proposed in the project study. We unequivocally support the rail option now.

Patty Nicoson, the president of the Dulles Corridor Rail Association, will testify a little later tonight and she will talk about some continued concerns we have about the planning as it relates to an access of individual stations, but the point being is that among these various groups, along with the Dulles Corridor Rail Association, we respectfully request that we go to the locally preferred alternative of rail.
July 22, 2002

Mr. John Dittmeier
Project Manager
Dulles Corridor Rapid Transit Project
WMATA
1550 Wilson Blvd., Suite 300
Arlington, VA 22209

RE: Noise impact on Hallcrest Heights community

Dear Mr. Dittmeier:

Over a year ago (May, 2001), Mr. Clark Tyler, President, Hallcrest Heights Associates, Inc. sent you a copy of a letter (enclosed) written by Mr. Michael A. Staiano, an acoustical engineer advising the Hallcrest Heights homeowners on the potential noise impact of the Dulles Corridor Rapid Transit Project. The letter makes recommendations to mitigate noise and suggests they be considered in the planning process. Mr. Tyler requested a response from you. Since he never heard from you, he sent another copy of the letter on February 28, 2002.

I am a strong supporter of public transit for Northern Virginia, including the Dulles Corridor Rapid Transit Project. I also think a major project such as this one requires the serious consideration of citizens’ concerns. Please reply to Mr. Tyler’s letters (May 2001 and February 2002) as soon as possible and send me a copy.

Thank you.

Sincerely yours,

James M. Scott

Cc: Clark Tyler
Enclosure
28 February 2002

Mr. John Dittmeier
Project Manager
Dulles Corridor Rapid Transit Project
WMATA
1550 Wilson Blvd. Suite 300
Arlington, VA 22209

Dear John:

You may recall that after our meeting with you and Len in May 2001, I followed up with a letter from our acoustical engineer, Mike Staiano, relative to the concept of “parallel barriers.” Have your engineers considered this in their preliminary work? Because it has been some time, I am enclosing another copy of Mike’s letter and would be interested in any reaction from your team.

It is my understanding that the draft EIS will be available sometime this spring with hearings to follow sometime early this summer. Is that still the timetable?

Thanks for your interest.

Sincerely,

[Signature]

Clark Tyler
President
Mr. M.L. Clark Tyler
Hallcrest Heights Associates, Inc.
7327 Eldorado Street
McLean, Virginia 22102

Subject: Meeting with WMATA Representatives re Dulles Corridor Rapid Transit Project

Dear Clark:

I thought that our 17-May meeting at the County Board of Supervisors offices regarding the noise concerns of the Halcrest Heights homeowners was productive. The WMATA representatives appeared to be forthcoming and reasonable. There is one matter that upon consideration of the likely project description in the vicinity of your community I believe should be addressed by WMATA as they perform their noise assessment: Where the Metrorail right-of-way rises above grade adjacent to your development, the vertical retaining walls and elevated structure will create sound-reflecting surfaces parallel to the existing highway noise barrier. Reflections from the railway structures may degrade the barrier performance in the manner of "parallel barriers." The significance of this should be examined and mitigation incorporated if necessary. (Mitigation can be accomplished by various means, the simplest of which is absorptive treatment of the vertical surfaces.)

If you have any questions, let me know.

Sincerely,

Michael A. Staiano
K.3.2 Commonwealth of Virginia, Senate

- August 18, 2002
Mr. Corey W. Hill  
Northern Virginia Regional Manager  
Virginia Department of Rail and Public Transportation  
i550 Wilson Boulevard, Suite 300  
Arlington, VA 22209

Dear Mr. Hill:

The purpose of this letter is to inform you of my views on the Draft Environmental Impact Statement for the Dulles Corridor Rapid Transit Project.

Having studied the alternatives analyzed in the study, I strongly support Metrorail to Dulles Airport and Loudoun County as the locally preferred alternative. This alternative will provide both the highest transit ridership and the highest number of new riders, resulting in a higher percentage of people using transit. More commuters will benefit from shorter travel times than other alternatives. The best option is to build rail the full length of the project from the beginning. Most people living in my Senate district, which extends from McLean to the Loudoun County border, clearly prefer this alternative. They view rail as an attractive way to commute. They also want to have the entire system at the earliest possible date.

However, there are numerous concerns in the community that I wish to emphasize.

**It is completely inappropriate to increase tolls on the Dulles Toll Road to pay for the construction of rail.** Commuters in the Corridor have been paying for the Dulles Toll Road for the past eighteen years. No other Virginians north of Richmond have been subjected to tolls. A typical commuter driving to work in D.C. from Reston fifty weeks a year is paying $375 each year. If that commuter has lived here for eighteen years, he has already paid $6750!

In addition, these same commuters have paid for construction of the Metrorail system for the rest of the Washington Metropolitan area.

The proposals in the Draft EIS that would increase tolls either $0.50 or $0.25 in 2003 and then an additional $0.25 every three years until 2015 are neither fair nor equitable. As the Draft EIS demonstrates, the benefits of rail to Dulles are extensive and far-
reaching, accruing to the entire metropolitan region and the state as a whole. To expect commuters paying increased tolls to generate between $725 and $800 million in funding for construction is unreasonable and simply wrong. These ill-conceived proposals to raise tolls should be discarded immediately.

Fortunately, there is an alternative. A portion of the undesignated funds that will be generated if the transportation referendum passes could be earmarked for this purpose.

**Insufficient attention is being paid to mitigating the impact of rail on adjoining communities.** Communities that are already suffering from inadequate abatement of noise from the Toll Road must be guaranteed that they will finally receive sufficient mitigation measures. Of particular concern is Hallcrest Heights in McLean, which has had only a deteriorating, dilapidated wooden barrier to stop the noise. Given that the proposal is for an elevated, curving rail structure to adjoin the community, they urgently need attention. However, noise is a serious concern for communities along the entire length of the proposed rail system and must be addressed responsibly.

Although viewed mainly as a business center, Tysons Corner is also a major residential area. The preferences of the residents of the Rotunda and other established residential communities deserve special consideration. The goal is to improve the quality of life for residents in the corridor; no one’s quality of life should suffer as a result.

Special sensitivity is needed in the design of the Reston stations to encourage bridging the Corridor, which currently severs the community. The design of rail stations should further the goal of linking the opposite sides of the corridor. The station designs should not preclude the possibility of air right linkages across the Dulles Corridor.

To avoid disruption of communities and to encourage rail usage, adequate structured parking as well as pedestrian and bicycle access are required system-wide.

**Careful planning for the related land use impacts is essential.** Rail will bring dramatic changes to the area – whether these are positive or negative will depend on the land use planning. This is an unprecedented opportunity to implement “smart growth” principles throughout the Corridor. Both Fairfax and Loudoun Counties have adopted Comprehensive Plans that support increased mixed-use development around the rail stations. Careful coordination of land use and transportation plans, with extensive public participation, needs to continue and take the highest priority.

Like the vast majority of residents and businesses in my district, I enthusiastically embrace the prospect of Rail Now to Dulles. And I look forward to assuring that it is done right.

Sincerely yours,

[Signature]

Senator Janet Howell
K.3.3 Commonwealth of Virginia, Department of Agriculture and Consumer Services

- January 19, 2001
January 19, 2001

Leonard E. Alfredson
Washington Metropolitan Area Transit Authority
1550 Wilson Blvd.
Suite 300
Arlington, VA 22209

RE: Dulles Corridor Rapid Transit Project

This letter is in response to your request concerning threatened or endangered plant or insects species in the vicinity of the proposed rapid transit project along Route 267 from the communities of Pimmit Hills in Fairfax County to Ryan in Loudoun County, VA. To date, Virginia Department of Agriculture and Consumer Services records indicate that no threatened or endangered plant or insect species have been documented in the area indicated in communications you provided. We do not anticipate significant adverse impacts upon plant or insect species under our jurisdiction to result from this project. However, the absence of data does not necessarily mean that no listed species occur in the area, but that our files do not currently contain information to document their presence.

The Virginia Department of Agriculture and Consumer Services has jurisdiction only over plant and insect species listed as threatened or endangered. To better serve citizens and agencies of the Commonwealth, the Virginia Departments of Agriculture and Consumer Services and Conservation and Recreation have entered into an agreement for the review of projects within Virginia. Future requests for information concerning endangered and threatened plants and insects should be directed to the Natural Heritage Division of the Department of Conservation and Recreation for initial evaluation. Projects found to demonstrate potential impact on these species will be referred to the Department of Agriculture and Consumer Services for further review and possible mitigation. Additional information on unique geologic formations, rare or critical habitat, and rare and candidate species can be obtained from VDCR/NH. The Virginia Department of Game and Inland Fisheries has jurisdiction over similarly listed endangered and threatened animal species.

Sincerely,

Keith R. Tignor
Endangered Species Coordinator

-Equal Opportunity Employer-
K.3.4 Commonwealth of Virginia, Department of Conservation and Recreation

- February 9, 2004
- November 1, 2002
- July 10, 2002
- January 16, 2002
- June 15, 2001
- February 1, 2001
- July 17, 2000
Mr. Gary Fenton, Executive Director Northern Virginia Regional Park Authority 5400 Ox Road Fairfax Station, Virginia 22039

Re: W &On Railroad Regional Park and nullles Corridor Rapid Transit Project Land and Water Conservation Fund (L&WCF) Projects #51-00186, #51-00221, and #51-00282

Dear Mr. Fenton:

After consultation with the National Park Service, we have determined that the proposed Dutles Corridor Rapid Transit Project will not constitute a conversion of use under the L&WCF Act. This determination is based on the fact that the metro rail overpass location will be within an existing transportation easement that now has an existing four-lane highway overpass.

We are confident the Park Authority will mitigate the metro rail construction in accordance with the items that were addressed in the Environmental Impact Statement, and that the project will not impede the nonnal trail use by the citizens of Northern Virginia.

Thank you for keeping us informed about the W &OD Trail. This trail is a valuable national asset and a "star" for the L&WCF Program.

Sincerely,

John R. Davy, Division Director
Planning and Recreation Resources

cc: Joseph H. Maroon
Jerry Cassidy

An Agency of the Natural Resources Secretariat
1 November 2002

Mr. Corey W. Hill
Northern Virginia Regional Manager
Virginia Department of Rail and Public Transportation
1550 Wilson Boulevard, Suite 300
Arlington, Virginia 22209

Re: Docket Number R02-1-Dulles Corridor Rapid Transit Project Public Hearings Report

Dear Mr. Hill:

The Department of Conservation and Recreation (DCR) has previously submitted comments on the Dulles Corridor Rapid Transit Project. After review of the "Public Hearings Report for the Draft Environmental Impact Statement and General Plans for the Dulles Corridor Rapid Transit Project", the DCR's Division of Natural Heritage DCR-DNH would like to offer the following comments:

1) According to the response comment documented on the top of page 209, Coastal Resources conducted a survey for rare, threatened and endangered plants in April and August of 2002 and the survey results indicated no species were found. DCR-DNH would like to review this survey report before it is included in the Final Environmental Impact Statement to verify all potential sites within the study area were surveyed for rare plants and verify the survey was conducted during the appropriate time of year. DCR-DNH is concerned that the rare diabase plant, earleaf foxglove (Agalinis auriculata, G2/S1/SOC/NS), may have been missed in the August survey due to the difficulty in identifying the plant in its vegetative state. The actual flowering period for this plant is September.

2) Also the reference to "Mr. Lugwig" in the response comment should be corrected to "Mr. Ludwig".

3) Please send the survey results to Rene Hypes, Project Review Coordinator-Division of Natural Heritage, Department of Conservation and Recreation, 217 Governor Street, 2nd Floor, Richmond, Virginia 23219.

Thank you for the opportunity to review the public hearings report.

Sincerely,

Derral Jones
Planning Bureau Manager

An Agency of the Natural Resources Secretariat
Mr. Corey Hill
Virginia Department of Rail and Public Transportation
1550 Wilson Blvd, Suite 300
Arlington, VA 22209

Subject: 2003 General Erosion & Sediment Control Specifications

Dear Sir/Madam:

On behalf of the Virginia Soil & Water Conservation Board, the Virginia Department of Conservation and Recreation (DCR) requests Erosion & Sediment Control (ESC) Specifications for 2003 for your company per Section 10.1-563 of the Virginia Erosion & Sediment Control Law. The deadline for submitting these specifications is September 15, 2002. Land-disturbing activities planned for the remainder of 2002 will still operate under previously approved 2001 ESC Specifications.

The enclosed “Virginia Linear Land-Disturbance Guidance” provides detailed information on the regulation and submittal requirements. Please forward your completed documents to Kelly Ramsey, Urban Programs Engineer, DCR, 203 Governor St., Ste. 206, Richmond, Virginia 23219.

Additionally, please provide updated company contact person information along with your ESC Specifications, and route this letter to the appropriate engineer or regulatory person within your company.

Please contact Kelly Ramsey above at (804) 371-7440 or e-mail LinearProjects@der.state.va.us, if you have questions or require assistance. Website information concerning erosion and sediment control, including the enclosed guidelines, is available at www.dcr.state.va.us/sw.htm.

Thank you in advance for attending to this matter.

Sincerely,

[Signature]

Lawrence J. Gavan
Manager, Urban Programs

Encl.
I. Regulated and Exempt Linear Activities

The Virginia Erosion and Sediment Control Law (VESCL) defines a land-disturbing activity as any land change of 10,000 square feet or greater that involves clearing, grading, excavating, transporting, and filling of land. The Department of Conservation and Recreation (DCR) regulates linear land-disturbance projects undertaken by utility, pipeline, and railroad companies. However, non-linear land-disturbance such as municipal utility, building and facilities construction are regulated by the appropriate locality. Section 10.1-563D of VESCL requires electric, natural gas and telephone utility companies, interstate and intrastate natural gas pipeline companies to submit Erosion and Sediment Control (ESC) Specifications that will apply to linear land-disturbance to DCR for review and approval.

Linear projects regulated by DCR are:

1. Construction, installation, and maintenance of electric, natural gas, and telephone utility lines and pipelines.
2. Construction of railroad tracks, rights-of-way, bridges, buildings, and facilities
3. Access roads, staging areas, and borrow/spoil sites associated with a linear project

Exempt linear projects are:

1. Projects less than 10,000 square feet (2,500 square fee in Tidewater Region, generally east of Interstate 95)
2. Individual service connections
3. Underground public utility lines installed, repaired, or maintained on an existing hard-surfaced road, street, or sidewalk
4. Installation of fencing, sign posts, posts, or poles
5. Repairs to existing railroad tracks, rights-of-way, bridges, and facilities
6. Purchasing time on existing lines (no land-disturbance)

II. Minimum Requirements for ESC Specifications Submittal

ESC Specifications explains and illustrates the erosion and sediment control measures to be used during linear, project-specific construction. The following information is required in the ESC Specifications Submittal:

1. Include *Virginia Erosion and Sediment Control Handbook (Handbook)* standard details and symbols that will be employed.
2. ESC practices not specified in the *Handbook*, such as trench plugs and directional drilling, shall describe in narrative format how the measures meet the 19 Minimum Standards. *(Ref. §4VAC50-30-50)*, and detailed as represented on construction plans (standard detail, symbol and notes)
3. Provide Project-Specific Information on all linear projects planned to be constructed in 2003. Include the following information:
   a. Project Name (or Number)
b. Project Location (including nearest major intersection)
c. On-site project manager name and contact information
d. Responsible Land Disturber name, certification number, and contact information (Section 10.1-563 and 10.1-566)
e. Project Description (including disturbed acreage estimate and projected start and finish dates)

4. Define the company’s obligations to ensure self-inspection, reporting, training, certification, environmental protection, and safety

5. Information concerning projects not included in the ESC Specifications should be emailed to DCR at LinearProjects@dcr.state.va.us.

III. Variance Requests

Modifying or waiving any of the ESC regulations, including the 19 Minimum Standards, on a project-specific basis, requires companies to submit a written Variance Request to DCR for review and approval. A typical project that requires a Variance is projects that open more than 500 feet of trench at one time (Minimum Standard 16). The recommended protocol for submitting Variance Requests is as follows:

1. Provide a project-specific ESC plan. An ESC plan explains and illustrates the control measures to be used during project-specific construction and shall include soil, topographic information, drainage divides, ESC details, and ESC notes
2. Provide project-specific justification that the proposed ESC plan meets the intents of the 19 Minimum Standards.
3. Define the company’s obligations to ensure self-inspection, reporting, training, environmental protection, and safety as required by DCR as a condition of approval
4. Present strategies for informing and educating contractors of the Variance requirements
5. Variance Requests should be emailed to DCR at LinearProjects@dcr.state.va.us in advance of project start

Variance Requests included in the ESC Specifications should be confined to linear activity. For example, Minimum Standard 6 (Sediment traps and Basins) generally does not apply to linear projects, therefore a Variance is not needed.

IV. Compliance

DCR Regional Office staff periodically inspects linear projects covered under the ESC Specifications, and the Virginia Soil and Water Conservation Board may undertake enforcement action if a project is out of compliance. Linear companies are urged to periodically inspect their projects routines (in some cases, regular inspection is a condition of approval). DCR also recommends pre-construction conferences with contractors, sub-contractors, land-developers, consultants and right-of-way users to communicate clearly the approved ESC practices.

V. Additional Information

This document and the Virginia Erosion and Sediment Control Handbook (Handbook) is available at DCR’s website, www.dcr.state.va.us/sw/e&s.htm. Questions regarding linear project land-disturbance may be directed to Kelly A. Ramsey at (804) 371-7440 or kramsey@dcr.state.va.us.
January 16, 2002

Mr. John Dittmeier
Washington Metropolitan Area Transit Authority
1550 Wilson Blvd., Suite 300
Arlington, VA 22209

Re: Dulles Corridor Rapid Transit Project

Dear Mr. Dittmeier:

The Department of Conservation and Recreation's Division of Natural Heritage (DCR) has searched its Biological and Conservation Data System (BCD) 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 species, unique or exemplary natural communities, and significant geologic formations.

According to the information currently in our files, several rare plants, which are typically associated with prairie vegetation and inhabit semi-open diabase glades in Virginia, may occur at this location if suitable habitat is present. Diabase glades are characterized by historically fire-dominated grassland vegetation on relatively nutrient-rich soils underlain by Triassic bedrock. Diabase flatrock, a hard, dark-colored volcanic rock, is found primarily in northern Virginia counties and is located within the geologic formation known as the Triassic Basin. Where the bedrock is exposed, a distinctive community type of drought-tolerant plants occurs. Diabase flatrocks are extremely rare natural communities that are threatened by activities such as quarrying and road construction (Rawinski, 1995).

In Northern Virginia, diabase supports occurrences of several global and state rare plant species: earleaf foxglove (Agalinis auriculata, G2/S1/SC/NS), white heath aster (Aster ericoides, G5/S2/NF/NS), blue-hearts (Buchnera americana, G3G4/S1/NF/NS), hairy beardtongue (Penstemon hirsutus, G4/S2/NF/NS), downy phlox (Phlox pilosa, G5T5/S2/NF/NS), stiff goldenrod (Oligoneuron rigidum var. rigidum, G5/S2/NF/NS), and marsh hedgenettle (Stachys pilosa var. arenicola, G5/S1/NF/NS). Please note that earleaf foxglove is currently tracked as a

An Agency of the Natural Resources Secretariat
species of concern by the United States Fish and Wildlife Service (USFWS); however this designation has no official legal status.

Due to the potential for this site to support populations of natural heritage resources, DCR recommends an inventory of suitable habitat in the study area. 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 J. Christopher Ludwig, Natural Heritage Inventory Manager, at (804) 371-6206 to discuss arrangements for field work. A list of other individuals who are qualified to conduct inventories may be obtained from the USFWS.

Any absence of data may indicate that the project area has not been surveyed, rather than confirm that the area lacks other natural heritage resources. DCR's Biological and Conservation Data System is continuously revised. Please contact DCR for an update on this natural heritage information if a significant amount of time passes before it is utilized.

Should you have any questions or concerns, feel free to contact me at 804-692-0984. Thank you for the opportunity to comment on this project.

Sincerely,

[Signature]

Elizabeth Locklear
Locality Liaison

Literature Cited

Ms. Meg Cederoth  
BRW  
1129 Twentieth Street  
Washington, DC  20036

Dear Ms. Cederoth:

In response to your telephone request, I am providing the following information on Land and Water Conservation Fund (L&WCF) projects in Loudoun and Fairfax Counties:

LOUDOUN COUNTY

None

FAIRFAX COUNTY

Burke Lake Park  
Potomac River Bend Acquisition  
Burling Tract Acquisition  
Riverview Park  
Lake Fairfax Park  
South Run District Park  
Bryant Farm Park  
Edsall/Providence Park  
Dam site I Recreation Area  
Braddock Park  
Ellanor C. Lawrence Park

NOTE: If you determine your project will impact on any park please contact this office. A park could have a name change or not be included on the list above.

If you have any questions, please call me at (804) 786-2093. Thank you.

Sincerely,

[Signature]

Jim Guyton  
Environmental Program Planner

JEG/br
Leonard Alfredson
Dulles Corridor Transit Project
1550 Wilson Blvd, Suite 300
Arlington, VA 22209

Re: Dulles Corridor Rapid Transit Project

Dear Mr. Alfredson:

The Department of Conservation and Recreation (DCR) has searched its Biological and Conservation Data System (BCD) 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.

Based on a review of the topographic and soil maps, the project area may contain diabase glade habitat. Several rare plants typically associated with prairie vegetation inhabit semi-open diabase glades in Virginia. Diabase glades are characterized by historically fire-dominated grassland vegetation on relatively nutrient-rich soils underlain by Triassic bedrock. Diabase flatrock, a hard, dark-colored volcanic rock, is found primarily in northern Virginia counties and is located within the geologic formation known as the Triassic Basin. Where the bedrock is exposed, a distinctive community type of drought-tolerant plants occurs. Diabase flatrocks are extremely rare natural communities that are threatened by activities such as quarrying and road construction (Rawinski, 1995).

In Northern Virginia, diabase supports occurrences of several global and state rare plant species: earleaf foxglove (Agalinis auriculata, G2/S1/SOC/NS), white heath aster (Aster ericoides, G5/52/NF/NS), blue-hearts (Buchnera americana, G3G4/S1/NF/NS), hairy beardless (Penstemon horridus, G4/S2/NF/NS), downy phlox (Phlox pilosa, G5T5/S2/NF/NS), stiff goldenrod (Oligoneuron rigidum var. rigidum, G5/S2/NF/NS), and marsh hedgenettle (Stachys pilosa var. arenicola, G5/S1/NF/NS). Please note that earleaf foxglove is currently tracked as a species of concern by the United States Fish and Wildlife Service (USFWS); however, this designation has no official legal status.

DCR understands that the majority of the proposed facility will be constructed in the median and the remainder is in the highly developed Tysons Corner area. For this reason, DCR does not
anticipate that this project will adversely impact diabase glade habitat and associated rare plants.

The wood turtle (Clemmys insculpta, G4/S2/NF/LT) has also been documented in the project vicinity. The wood turtle inhabits forested floodplains and nearby fields, wet meadows, and farmlands (Mitchell, 1994). As this species overwinters on the bottoms of creeks and streams, a primary habitat requirement is the presence of water (Mitchell, 1994). Please note that the wood turtle is classified as threatened by the Virginia Department of Game and Inland Fisheries (VDGIF). To minimize adverse impacts to the wood turtle’s aquatic habitat, DCR recommends the implementation of and strict adherence to erosion and sediment control measures during all phases of this project.

Under the Memorandum of Agreement established between the Virginia Department of Agriculture and Consumer Services (VDACS) and the Department of Conservation and Recreation (DCR), DCR has the authority to report for VDACS on state-listed plant and insect species. The current activity will not affect any documented state-listed plants or insects.

Any absence of data may indicate that the project area has not been surveyed, rather than confirm that the area lacks natural heritage resources. New and updated information is continually added to BCD. Please contact DCR for an update on this natural heritage information if a significant amount of time passes before it is utilized.

Should you have any questions or concerns, feel free to contact me at 804-692-0984. Thank you for the opportunity to comment on this project.

Sincerely,

[Signature]

Robbie Barbuto
Locality Liaison

Cc: Kim Marbasin, USFWS
    Ray Fernald, VDGIF
Literature Cited


Mr. Len Alfredson, Project Manager
Washington Metropolitan Area Transit Authority
Dulles Corridor Rapid Transit Project
1550 Wilson Boulevard, Suite 300
Arlington, Virginia 22209

Re: Dulles Corridor Rapid Transit Project

Dear Mr. Alfredson:

The Department of Conservation and Recreation (DCR) has searched its Biological and Conservation Data System (BCD) 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.

Based on a review of the topographic and soil maps, the project area may contain diabase glade habitat. Several rare plants typically associated with prairie vegetation inhabit semi-open diabase glades in Virginia. Diabase glades are characterized by historically fire-dominated grassland vegetation on relatively nutrient-rich soils underlain by Triassic bedrock. Diabase flatrock, a hard, dark-colored volcanic rock, is found primarily in northern Virginia counties and is located within the geologic formation known as the Triassic Basin. Where the bedrock is exposed, a distinctive community type of drought-tolerant plants occurs. Diabase flatrocks are extremely rare natural communities that are threatened by activities such as quarrying and road construction (Rawinski, 1995).

In Northern Virginia, diabase supports occurrences of several global and state rare plant species: earleaf foxglove (Agalinis auriculata, G2/S1/SOC/NS), white heath aster (Aster ericoides, G5/S2/NF/NS), blue hearts (Bucknera americana, G3/G4/S1/NF/NS), hairy beartongue (Penstemon hirsutus, G4/S2/NF/NS), downy phlox (Phlox pilosa, G5/S1/NF/NS), stiff goldenrod (Oligoneuron rigidum var. rigidum, G5/S2/NF/NS), and marsh hedgenettle (Stachys pilosa var. arenicola, G5/S1/NF/NS). Please note that earleaf foxglove is currently tracked as a species of concern by the United States Fish and Wildlife Service (USFWS), however this designation has no official legal status.

DCR understands that the majority of the proposed facility will be constructed in the median and the remainder is in the highly developed Tysons Corner area. For this reason, DCR does not anticipate that this project will adversely impact diabase glade habitat and associated rare plants.

The wood turtle (Clemmys insculpta, G4/S2/NF/LT) has also been documented in the project vicinity. The wood turtle inhabits forested floodplains and nearby fields, wet meadows, and farmlands (Mitchell, 1994). As this species overwinters on the bottoms of creeks and streams, a primary habitat requirement is the presence of water (Mitchell, 1994). Please note that the wood turtle is classified as threatened by the Virginia Department of Game and Inland Fisheries (VDGFIP). To minimize adverse impacts to the wood turtle's aquatic habitat, DCR recommends
the implementation of any strict adherence to erosion and sediment control measures during all phases of this project.

Any absence of data may indicate that the project area has not been surveyed, rather than confirm that the area lacks natural heritage resources. New and updated information is continually added to BCD. Please contact DCR for an update on this natural heritage information if a significant amount of time passes before it is utilized.

From the information provided in the scoping packet, it is difficult to discern "the project authority" for this project, i.e., the Washington Metropolitan Area Transit Authority, or the Virginia Department of Rail and Public Transportation. Therefore, we assume that this project is a multi-jurisdictional local project or is being conducted by a state agency. In the event that this project is not conducted across multiple local jurisdictions or is not undertaken by a state agency, the applicant should contact DCR's Division of Soil and Water Conservation (DSWC) for further information.

In general, however for issues of soil and water conservation, all railroad construction projects that involve a land-disturbing activity of over 10,000 square feet must prepare a project-specific Erosion and Sediment Control (ESC) plan for review and approval by DCR's DSWC. An approved plan is required prior to initiation of any land-disturbing activity at the project site. All plans must be prepared in accordance with the Virginia Erosion & Sediment Control Handbook, Virginia Erosion & Sediment Control Law (VESCL) and Regulations (VESCR). ESC plans should be submitted directly to the DCR Watershed Office that serves the area where the project will be undertaken. [Ref: VESCL §10.1-560, §10.1-563.A, §10.1-564; VESCR §4VAC50-30-30, VESCR §4VAC50-30-100]

Similarly, all projects that involve a land clearing, soil movement, or construction activity of over one acre must prepare a project-specific Stormwater Management (SWM) plan for review and approval by DCR's DSWC. An approved plan is required prior to initiation of any regulated activities at the project site. However, please note that railroad and other linear development projects may be exempt from this requirement provided that (i) less than one acre of land will be disturbed per outfall or watershed, (ii) there will be insignificant increases in peak flow rates, and (iii) there are no existing or anticipated flooding or erosion problems downstream of the discharge point. The applicant may contact DSWC for assistance in determining whether a SWM plan is required for this project. Notwithstanding, plans must be prepared in accordance with the Virginia Stormwater Management Act (VSWMA) and Regulations (VSWMR). SWM plans should be submitted directly to the DCR Watershed Office that serves the area where the project will be undertaken. [Ref: VSWMA §10.1-603.5 and §10.1-603.8.B.5; VSWMR §4VAC-3-20-210 - 245].

Enclosed for use in directing project-specific plans and technical and regulatory inquiries to the appropriate DCR Watershed Office is a copy of the guidance document titled, DCR/DSWC Urban Programs Information & Contacts.

For your records, the proposed project is not anticipated to have any adverse impacts on existing or planned recreational facilities. Nor will it impact any streams on the National Park Service Nationwide Inventory, Final List of Rivers, potential Scenic Rivers or existing or potential State Scenic Byways.

Sincerely,

Derral Jones
Planning Bureau Manager

/saw

Cc: William Hester, USFWS
Ray Fernald, VDGIF
Literature Cited


Definition of Abbreviations Used on Natural Heritage Resource Lists
Virginia Department of Conservation and Recreation

Natural Heritage Ranks

The following ranks are used by the Virginia Department of Conservation and Recreation to set protection priorities for natural heritage resources. Natural Heritage Resources, or "NHRs," are rare plant and animal species, rare and exemplary natural communities, and significant geologic features. The primary criterion for ranking NHRs is the number of populations or occurrences, i.e., the number of known distinct localities. Also of great importance is the number of individuals in existence at each locality or, if a highly mobile organism (e.g., sea turtles, many birds, and butterflies), the total number of individuals. Other considerations may include the quality of the occurrences, the number of protected occurrences, and threats. However, the emphasis remains on the number of populations or occurrences such that ranks will be an index of known biological rarity.

S1 Extremely rare; usually 5 or fewer populations or occurrences in the state, or may be a few remaining individuals, often especially vulnerable to extinction.

S2 Very rare; usually between 5 and 20 populations or occurrences; or with many individuals in fewer occurrences; often susceptible to becoming extinct.

S3 Rare to uncommon; usually between 20 and 100 populations or occurrences; may have fewer occurrences, but with a large number of individuals in some populations; may be susceptible to large-scale disturbances.

S4 Common; usually >100 populations or occurrences, but may be fewer with many large populations; may be restricted to only a portion of the state; usually not susceptible to immediate threats.

S5 Very common; demonstrably secure under present conditions.

SA Accidental in the state.

SB Breeding status of an organism within the state.

SH Historically known from the state, but not verified for an extended period, usually >15 years; this rank is used primarily when inventory has been attempted recently.

SN Non-breeding status within the state. Usually applied to winter resident species.

SU Status uncertain, often because of low search effort or cryptic nature of the element.

SX Apparently extinct from the state.

SZ Long distance migrant whose occurrences during migration are too irregular, transitory and/or dispersed to be reliably identified, mapped and protected.

Global ranks are similar, but refer to a species' rarity throughout its total range. Global ranks are denoted with a "G" followed by a character. Note that GA and GN are not used and GS means apparently extinct. A "G" in a rank indicates that a taxonomic question concerning that species exists. Ranks for subspecies are denoted with a "1". The global and state ranks combined (e.g., GJ/S1) give an instant grip of a species' known rarity.

These ranks should not be interpreted as legal designations.

Federal Legal Status

The Division of Natural Heritage uses the standard abbreviations for Federal endangerment developed by the U.S. Fish and Wildlife Service, Division of Endangered Species and Habitat Conservation.

LE Listed Endangered - threatened with extinction throughout all or a significant portion of its range
LT Listed Threatened - likely to become endangered in the foreseeable future
PE Proposed Endangered
PT Proposed Threatened
ESUA Treat as endangered because of similarity of appearance
TSA Treat as threatened because of similarity of appearance
C Candidate - enough information is available to propose for listing, but listing is precluded by other pending proposals of higher priority
SOC Species of Concern - species that merit special concern (not a regulatory category)
NF No federal legal status

State Legal Status

The Division of Natural Heritage uses similar abbreviations for State endangerment.

LE Listed Endangered
LT Listed Threatened
C Candidate
SC Special Concern - animals that merit special concern according to VDGIF (not a regulatory category)
NS No state legal status

For information on the laws pertaining to threatened or endangered species, contact:
Department of Agriculture and Consumer Services Plant Protection Bureau for STATE listed plants and insects
Department of Game and Inland Fisheries for all other STATE listed animals.
DCR/DSWC URBAN PROGRAMS INFORMATION & CONTACTS
Erosion and Sediment Control (ESC) and Stormwater Management (SWM) Programs

HOME PAGES
http://www.state.va.us/~dcr/sw/e&s.htm & http://www.state.va.us/~dcr/sw/stormwat.htm

TRAINING & CERTIFICATION HOME PAGE
http://www.state.va.us/~dcr/sw/estr&crt.htm

LINKS TO LOCALITIES

DCR CENTRAL OFFICE
203 Governor Street, Suite 206
Richmond, VA 23219

<table>
<thead>
<tr>
<th>Program Support Technician</th>
<th>Assistant Program Support Technician</th>
</tr>
</thead>
<tbody>
<tr>
<td>Regina Greene</td>
<td>Nicole Gordon</td>
</tr>
<tr>
<td>(804) 371-7533</td>
<td>(804) 371-7489</td>
</tr>
<tr>
<td>fax 786-1978</td>
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<tr>
<th>Stormwater Management Program Manager</th>
<th>Erosion and Sediment Control Program Manager</th>
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<tr>
<td>Joseph G. Battista</td>
<td>Jacob A. Porter</td>
</tr>
<tr>
<td>(804) 371-7492</td>
<td>(804) 786-3997</td>
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<tr>
<th>Urban Programs Training and Certification Coordinator</th>
<th>Urban Programs Regulatory Coordinator</th>
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<tr>
<td>John T. Baranowski</td>
<td>Michael C. Gerel</td>
</tr>
<tr>
<td>(804) 371-7532</td>
<td>(804) 371-7440</td>
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DCR WASTEWATER OFFICES
Urban Program Compliance Engineers (UPCE) & Urban Program Engineers (UPE)
Field Representatives

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<tr>
<th>Shenandoah Watershed Office</th>
<th>James Watershed Office</th>
<th>Potomac Watershed Office</th>
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<tr>
<td>Manager - Charlie Wade</td>
<td>Manager - Michael Bowman</td>
<td>Manager - Mary Apostolico</td>
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<tr>
<td>Tamara Keeler (UPCE)</td>
<td>Robert E. Cooper (UPE)</td>
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<td>John S. Minnick (UPCE)</td>
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<td>Lynn A. Snyder (UPCE-James West)</td>
<td>Vacant (UPCE - James Central)</td>
<td>98 Alexandria Pike, Suite 33</td>
</tr>
<tr>
<td>Route 4, Box 99-J</td>
<td>3800 Stillman Parkway, Suite 102</td>
<td>Warrenton, VA, 22186</td>
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<tr>
<td>Staunton, VA 24401</td>
<td>Richmond, VA 23233</td>
<td>(540) 347-6420</td>
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<tr>
<td>(540) 332-9991</td>
<td>(804) 527-4484</td>
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<tr>
<td>Commonwealth Building,</td>
<td>Post Office Box 1425</td>
<td>252 W. Main St., Suite 3</td>
</tr>
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<td>Tappahannock, VA 22560</td>
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<td>411 Boyd Street</td>
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<tr>
<td>Chase City, VA 23924</td>
<td>Post Office Box 1506</td>
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### ESC Program - CITIES

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*Note: The table lists cities and towns along with their respective watershed offices.*
Shenandoah Watershed Office
Manager - Charlie Wade
Tamara Keeler (UPCE)
John S. Mnarcik (UPE)
Lynn A. Snyder (UPCE-James West)
Route 4, Box 99-J
Staunton, VA 24401
(540)332-9991
fax: 332-8956

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Manager - Michael Bowman
Robert E. Cooper (UPE)
VACANT (UPCE - James East)
VACANT (UPCE - James Central)
3800 Stillman Parkway, Suite 102
Richmond, VA 23233
(804)527-4484
fax:527-4483

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York Watershed Office  
Manager - Darryl Glover  
Kenny W. Harper (UPCE)  
Post Office Box 1425  
Tappahannock, VA 22560  
(804) 443-6752  
fax: 443-4534

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K.3.5 Commonwealth of Virginia, Department of Environmental Quality

- December 18, 2003
  - Participating agencies:
    - Department of Environmental Quality
    - Department of Agriculture and Consumer Services
    - Department of Conservation and Recreation
    - Marine Resources Commission
    - Department of Historic Resources
    - Chesapeake Bay Local Assistance Department
    - Northern Virginia Regional Commission
    - Loudoun County
    - Town of Leesburg

- October 28, 2002
- August 27, 2002
  - Participating agencies:
    - Department of Environmental Quality
    - Department of Conservation and Recreation
    - Department of Transportation
    - Marine Resources Commission
    - Department of Historic Resources
    - Department of Mines, Minerals, and Energy
    - Department of Forestry
    - Chesapeake Bay Local Assistance Department
December 18, 2003

Mr. Karl A. Rohrer, AICP
Project Manager
Virginia Department of Rail and Public Transportation
1550 Wilson Boulevard, Suite 300
Arlington, Virginia 22209

RE: Supplemental Draft Environmental Impact Statement for the Dulles Corridor Rapid Transit Project
DEQ-03-210F

Dear Mr. Rohrer:

The Commonwealth of Virginia has completed its review of the above document (hereinafter “SDEIS”), which is a National Environmental Policy Act (“NEPA”) document prepared jointly by the Department of Rail and Public Transportation, the Washington Metropolitan Area Transit Authority, and the Federal Transit Administration. The Department of Environmental Quality is responsible for coordinating Virginia’s review of federal environmental documents and responding to appropriate federal (and, in this case, state) officials on behalf of the Commonwealth. The following agencies, planning district commission, and localities participated in this review:

Department of Environmental Quality (hereinafter “DEQ”)  
Department of Agriculture and Consumer Services  
Department of Conservation and Recreation  
Marine Resources Commission  
Department of Historic Resources  
Chesapeake Bay Local Assistance Department  
Northern Virginia Regional Commission  
Loudoun County  
Town of Leesburg

In addition, the following agencies and localities were invited to comment:
Department of Game and Inland Fisheries
Department of Health
Department of Transportation
Department of Forestry
Department of Aviation
Department of Rail and Public Transportation (proponent agency)
Arlington County
Fairfax County (indicated its intent to respond by the deadline)
City of Falls Church
Town of Herndon
Town of Vienna.

Project Description

The Federal Transit Administration, the Washington Metropolitan Area Transit Authority, and the Virginia Department of Rail and Public Transportation, with the cooperation of the Federal Aviation Administration, are proposing alternative transit improvements in the Dulles Corridor. This corridor runs from the East Falls Church Metrorail station in Fairfax County past Tyson’s Corner to Dulles Airport and into Loudoun County.

The Draft EIS, published in the summer of 2002 (reviewed under DEQ-02-124F, comments mailed August 27, 2002), analyzed five alternatives (Supplemental Draft EIS, page 2-1, section 2.1):

- “No-Build,” meaning the existing situation and planned projects through the year 2025;
- Bus Rapid Transit (BRT), meaning a bus-based system, with separate bus stops and stations, and three alignment options;
- Metrorail, meaning extension of the Metrorail system, and several alignment and service area options;
- BRT/Metrorail, meaning a combination of the two alternatives above; and
- Phased implementation, combining the foregoing three alternatives into a program of improvements implemented in stages (i.e., BRT, then BRT/Metrorail, then Metrorail).

The Supplemental Draft EIS (hereinafter “SDEIS”) analyzes the following alternatives (page 2-3, section 2.2):
• The “baseline” or “no-build” alternative consists of the existing highway and transit infrastructure and services, and any that are committed for implementation by the year 2025.

• Metrorail Alternative: The Metrorail system would be extended from a point between the East and West Falls Church stations to State Route 772, by way of a number of track and station alignment options, and ancillary facilities would be included. There would be 11 new stations, bus routes feeding into stations, and regional routes running the length of the corridor.

• Proposed Locally Preferred Alternative: Facilities for the Locally Preferred Alternative (LPA) would be similar to those for the Metrorail Alternative. The differences would be in phasing and other aspects of operation and design.

Environmental Impacts and Mitigation

1. Natural Heritage Resources. The Department of Conservation and Recreation (DCR) has searched its Biotics Data System (formerly the Biological and Conservation Data Base) for occurrences of natural heritage resources in the project area. “Natural heritage resources” are defined as the habitat of rare, threatened, or endangered plant and animal species, unique or exemplary natural communities, significant geologic formations, and similar features of scientific interest. Natural heritage resources have been documented in the project area. However, due to the scope of project activity and the distance to the resources in question, DCR does not anticipate that the project, as proposed, would adversely affect natural heritage resources.

Under a memorandum of agreement between DCR and the Department of Agriculture and Consumer Services (VDACS), DCR represents VDACS in commenting on potential impacts of projects on state-listed plant and insect species. The proposed project will not affect any documented state-listed plants or insects. The Department of Agriculture and Consumer Services, which has jurisdiction over state-listed endangered and threatened plants and insects, confirms this statement.

DCR also reports that no state natural areas under its jurisdiction are in the project vicinity.

2. Air Quality. DEQ’s Air Division reiterates its earlier guidance relative to open burning and fugitive dust emissions. The Division also continues to recommend restricting emissions of volatile organic compounds and oxides of nitrogen because the project will take place in an ozone non-attainment area and an emissions control area for volatile organic compounds and oxides of nitrogen, the precursors to atmospheric ozone.
3. Water Quality. DEQ’s Water Division commends the project proponents for planning to construct rail lines primarily within the medians of existing roads, because this approach is a helpful strategy for the avoidance of impacts to surface waters, among other things. Other ways to minimize impacts include completely spanning wetlands and streams, and shifting the alignment.

(a) Stream and Wetland Impacts. Unavoidable stream and wetland impacts will require full compensatory mitigation, as explained in the SDEIS (pages 4-12 through 4-15, section 4.2.3), including permanent conversion from one wetland type to another of lesser value. Examples of avoidance and minimization include completely spanning wetlands and streams. DEQ’s Water Division recommends strict adherence to erosion and sediment control practices and stormwater management requirements (see item 5, below), and effective monitoring of construction activities to ensure that erosion controls and stormwater management practices are adequately preventing sediment and pollution from entering adjacent surface waters. Adherence to state and local erosion and sediment control and stormwater management requirements (see item 5, below) will help minimize short-term water quality impacts from this project. See “Regulatory and Coordination Needs,” item 1, below.

In general, DEQ recommends that stream and wetland impacts be avoided to the maximum extent practicable. For unavoidable impacts, DEQ encourages the following practices to minimize project impacts to wetlands and waterways:

- Operate machinery and construction vehicles outside of stream-beds and wetlands; use synthetic mats when in-stream work is unavoidable;
- Erosion and sedimentation controls should be designed in accordance with the most current edition of the Virginia Erosion and Sediment Control Handbook. These controls should be in place prior to clearing and grading, and maintained in good working order to minimize impacts to State waters. The controls should remain in place until the area is stabilized. (See also item 5, below.)
- Place heavy equipment, located in temporarily impacted wetland areas, on mats, geotextile fabric, or use other suitable measures to minimize soil disturbance, to the maximum extent practicable.
- Restore all temporarily disturbed wetland areas to pre-construction conditions and plant or seed with appropriate wetlands vegetation in accordance with the cover type (emergent, scrub-shrub, or forested). The project proponents should take all appropriate measures to promote re-vegetation of these areas. Stabilization and restoration efforts should occur immediately after the temporary disturbance of each wetland area instead of waiting until the entire project has been completed.
- Place all materials which are temporarily stockpiled in wetlands, designated for use for the immediate stabilization of wetlands, on mats, geotextile fabric in order to
prevent entry into State waters. These materials should be managed in a manner that prevents leachates from entering state waters and must be entirely removed within thirty days following completion of that construction activity. The disturbed areas should be returned to their original contours, stabilized within thirty days following removal of the stockpile, and restored to the original vegetated state.

- All non-impacted surface waters within the project or right-of-way limits that are within 50 feet of any clearing, grading, or filling activities should be clearly flagged or marked for the life of the construction activity within that area. The project proponents should notify all contractors that these marked areas are surface waters where no activities are to occur.
- Measures should be employed to prevent spills of fuels or lubricants into state waters.

Loudoun County indicates its support for the federal goal of no net loss to wetlands. The County will identify optimum receiving sites for wetland mitigation, with a priority given to each geographic Policy Area (see the County’s Revised General Plan, Policy 23). Therefore, the County prefers that any wetland impacts from the proposed project be mitigated within the Suburban Policy Area. However, if a wetland mitigation bank is not available in that Area at the time the impacts are incurred, then County staff prefers that impacts in Loudoun County be mitigated at the Bull Run Wetland Bank (SDEIS, Figure 4.2-2, following page 4-12).

(b) Loudoun County Planning Considerations. In connection with the discussion of water resources and mitigation of water resource impacts (SDEIS, pages 4-3 and 4.4, section 4.2), Loudoun County points out that its adoption of the Revised 1993 Zoning Ordinance in 2003 included establishment of a River and Stream Corridor Overlay District, which implements many of the policies outlined in the Revised General Plan. The River and Stream Corridor Overlay District identifies resources of concern and planning considerations. River and Stream Corridor Resources include:

- rivers and streams draining 100 acres or more
- 100-year floodplains (major and minor)
- adjacent steep slopes (i.e., 25% or greater, starting within 50 feet of streams and floodplains, extending no farther than 100 feet beyond the originating stream or floodplain)
- a 50-foot Management Buffer surrounding floodplains and adjacent steep slopes
- wetlands, forests, historic and cultural resources, and archaeological sites that fall within the area of one or more of the above resources

In addition, a 300-foot no-build buffer or the River and Stream Corridor Overlay District, whichever is greater, will be applied to scenic rivers, the Potomac River, Bull Run, and
the protected shoreline of drinking water reservoirs (see the County’s Revised General Plan, Policies 1, 8, and 11).

The SDEIS lists coordination with local jurisdictions on mitigation for non-conformity of any project within critical areas as an available option (page 4-12, section 4.2.3). The County staff considers such coordination to be a requirement for any element of a project affecting a River and Stream Corridor Overlay District. See “Regulatory and Coordination Needs,” item 6, below.

4. Solid and Hazardous Waste Management. According to DEQ’s Waste Division, solid and hazardous waste issues were addressed in the SDEIS. DEQ’s Waste Division did a cursory review of its data files and did not find any additional contamination sites that might affect, or be affected by, the project.

Pollution prevention was not addressed in the SDEIS. DEQ encourages the proponents to implement pollution prevention principles, including the reduction of solid wastes at the source, re-use of materials, and recycling of waste materials. (See item 9, below, for additional guidance on pollution prevention.)

5. Erosion and Sediment Control; Stormwater Management. Federal agencies and their authorized agents conducting regulated land-disturbing activities on public and private lands in the Commonwealth of Virginia must comply with the Virginia Erosion and Sediment Control Law (Virginia Code section 10.1-567), the Virginia Stormwater Management Law (Virginia Code section 10.1-603.15), and other applicable federal non-point source pollution control mandates such as section 313 of the Clean Water Act and the federal consistency requirements of the Coastal Zone Management Act. Clearing and grading activities, installation of staging areas, parking lots, roads, buildings, utilities, or other structures, soil/dredge spoil areas, or related land conversion activities that disturb 2,500 square feet or more (in Chesapeake Bay Preservation Areas, as defined; see Virginia’s Chesapeake Bay Preservation Area Designation and Management Regulations, 9 VAC 10-20-10 et seq., specifically 9 VAC 10-20-70 through 10-20-105 or consult with the appropriate locality’s planning department) are regulated by the Erosion and Sediment Control Law (Virginia Code section 10.1-567) and its implementing regulations. Similar activities that disturb one acre or more are regulated by the Stormwater Management Law (Virginia Code section 10.1-603.5) and its implementing regulations. Accordingly, the project proponents should prepare and implement Erosion and Sediment Control Plans and Stormwater Management Plans that comply with state law. The project proponents are ultimately responsible for achieving project compliance through oversight of on-site contractors, regular field inspection, prompt action against non-compliance, and/or other mechanisms consistent with agency policy. See “Regulatory and Coordination Needs,” item 3, below.
Special attention should be given to post-construction stormwater quality management, according to the Northern Virginia Regional Commission. The project proponents must adhere to the post-development water quality requirements set out in the Virginia Stormwater Management Regulations (4 VAC 30-30 through 4 VAC 30-100). If these requirements are met, the proponents will thereby meet the requirement that state agency projects comply with local ordinances pursuant to the Chesapeake Bay Preservation Act (Virginia Code sections 10.1-2100 et seq.). The Northern Virginia BMP Handbook has calculation procedures for stormwater quality requirements; the proponents may obtain a copy through the Regional Commission’s website, www.novaregion.org.

The Regional Commission also recommends that the proponents explore opportunities, where possible, for retrofit of existing stormwater quantity facilities to stormwater quality facilities through new construction activities. The Regional Commission’s Guidebook for Maintaining BMPs in Northern Virginia is also available from the website, or it can be obtained from the Commission without charge. See “Regulatory and Coordination Needs,” item 3, below.

6. Historic Structures and Archaeological Resources. According to the SDEIS, the proposed Locally Preferred Alternative would not give rise to adverse effects upon architectural resources in the project area (see Table 3.5-2, page 3-34). The Department of Historic Resources, in a letter to the Virginia Department of Rail and Public Transportation dated November 19, 2003, indicated that it could not concur with this statement, because it had not reviewed the information that gives rise to the conclusion; the SDEIS cites “further analysis” as confirming a conclusion that views in the “peekaboo” sequence would be effectively mitigated (see SDEIS, page 3-33, section 3.5).

The “peekaboo” sequence refers to the repeated appearances of the Dulles Airport Terminal to motor vehicle drivers and passengers traveling west toward the Airport on the Dulles Access Highway. According to the Department of Rail and Public Transportation, the first (easternmost) of these views no longer exists because of intervening building construction (Holma/Ellis, 12/17/03). At a December 16 meeting involving the Department of Historic Resources (DHR) and project proponents, the proponents recommended defining the second such view (farthest east of the Airport of the remaining three views) as the eastern boundary of property potentially eligible for the National Register of Historic Places and the Virginia Landmarks Register. This boundary would be at the line where the first view of the Airport Terminal appears to the westbound driver. DHR is awaiting further analysis of this recommendation by the proponents. See “Regulatory and Coordination Needs,” item 5, below.

DHR does agree with the proponents’ suggestion to revise the Area of Potential Effect from 1000 feet on either side of the transit system centerline (and 1000 feet from
related construction, such as transit stations) to 600 hundred feet from the transit centerline and around transit stations (Holma/Ellis, 12/18/03).

Loudoun County points out that the SDEIS described the Area of Potential Effect as 200 feet beyond station footprints to allow for possible variation during construction (see Figures 3.5-1a and 3.5-1b, following page 3-28). The County should be contacted if variations in the proposed alignment will affect additional sites. In addition, the County should continue to be a consulting party as impact mitigation strategies are discussed. See “Regulatory and Coordination Needs,” item 5, below.

7. Chesapeake Bay Preservation Areas. According to the Northern Virginia Regional Commission, Fairfax County and the Town of Herndon have enacted jurisdiction-wide Chesapeake Bay Resource Management Area (RMA) designations. This designation requires that all development result in a no-net-increase standard for phosphorus loadings, based on the jurisdiction’s average imperviousness. In addition, since a Resource Management Area is one of two classifications of a Chesapeake Bay Preservation Area, the threshold for application of the Erosion and Sediment Control Plan is 2,500 square feet of land disturbance, rather than 10,000 square feet in areas not so designated. See item 5, above.

As the Chesapeake Bay Local Assistance Department indicated in reviewing the Draft EIS (its comments dated July 31, 2002, with our reply to the Draft EIS, dated August 27, 2002 (DEQ-02-124F, pages 7-8), road and railway projects are conditionally exempt from the requirements of the Chesapeake Bay Preservation Area Designation and Management Regulations (9 VAC 10-20-10 et seq.) provided such projects are constructed, operated, and maintained in accordance with the Virginia Erosion and Sediment Control Law and the Virginia Stormwater Management Act (or an equivalent local program). This conditional exemption also requires that road alignments and design prevent or otherwise minimize (i) encroachment in Resource Protection Areas, as defined in the Regulations, and (ii) adverse effects on water quality. Non-linear features of the project, such as parking lots and stations, are not exempt and must be consistent with the General Performance Criteria and the Development Criteria for Resource Protection Areas. (The General Performance Criteria and the Development Criteria are found in the Regulations, respectively, at 9 VAC 10-20-120 and 9 VAC 10-20-130.) During planning and design phases, site-specific surveys should be conducted to verify the presence or absence, and boundaries, of any Resource Protection Areas.

8. Recreation Facilities and Resources. In the judgment of the Department of Conservation and Recreation, the SDEIS does a thorough job of addressing the impacts of crossings of the Washington and Old Dominion (W&OD) Trail. It should be noted that a planned future greenway/trail in the area is not addressed in the SDEIS. That trail, the Fairfax Cross-Country Trail, is to connect Great Falls National Park with Fort
Belvoir. The transit corridor will cross this trail corridor; accordingly, the proponents should consider, and provide accommodation for, this trail in final plans. See “Regulatory and Coordination Needs,” item 6, below.

9. Pollution Prevention. As we stated in our reply to the Draft EIS, dated August 27, 2002 (DEQ-02-124F, page 9, item 11), DEQ advocates that principles of pollution prevention be used in all construction projects as well as in facility operations. Effective siting, planning, and on-site Best Management Practices (BMPs) will help to ensure that environmental impacts are minimized. However, pollution prevention techniques also include decisions related to construction materials, design, and operational procedures that will facilitate the reduction of wastes at the source. We have several pollution prevention recommendations that may be helpful in constructing or operating this project:

- Consider development of an Environmental Management System (EMS). An effective EMS will ensure that the proposed facility is committed to minimizing its environmental impacts, setting environmental goals, and achieving improvements in its environmental performance. DEQ offers EMS development assistance and recognizes facilities with effective Environmental Management Systems through its Virginia Environmental Excellence Program.
- Consider designs, techniques, and technologies that will facilitate the re-circulation and re-use of waters used for cooling and steam generation. These techniques can save money by minimizing intake and treatment needs.
- Consider environmental attributes when purchasing materials. For example, the extent of recycled material content, toxicity level, and amount of packaging should be considered and can be specified in purchasing contracts.
- Consider contractors’ commitments to the environment (such as an EMS) when choosing contractors. Specifications regarding raw materials and construction practices can be included in contract documents and requests for proposals.
- Choose sustainable materials and practices for infrastructure and building construction and design. These could include asphalt and concrete containing recycled materials, and integrated pest management in landscaping, among other things.
- Integrate pollution prevention techniques into facility maintenance and operation, to include the following: inventory control (record-keeping and centralized storage for hazardous materials), product substitution (use of non-toxic cleaners), and source reduction (fixing leaks, energy-efficient HVAC and equipment). Maintenance facilities should be designed with sufficient and suitable space to allow for effective inventory control and preventive maintenance.
DEQ’s Office of Pollution Prevention provides free information and technical assistance relating to pollution prevention techniques and EMS. If interested, the project proponents may contact that Office (Tom Griffin, telephone (804) 698-4545).

10. Local and Regional Comments.

(a) Northern Virginia Regional Commission. See items 5 and 7, above.

(b) Loudoun County. Loudoun County has corresponded directly as well as with this Office regarding the SDEIS. The issues not reflected herein (see items 3 and 6, above, and “Regulatory and Coordination Needs,” items 5 and 6, below) pertain to additional planning considerations and/or to corrections in the document; see the attached comments from the County (December 15, 2003 letter).

(c) Towns of Leesburg, Herndon, and Vienna. Leesburg indicates no comment.

Regulatory and Coordination Needs

1. Water Resources Permitting. A Virginia Water Protection Permit will be required for this project pursuant to 9 VAC 25-210-10 et seq. In addition, because it is likely to disturb one acre or more of land area, the project will require a Virginia Pollutant Discharge Elimination System (VPDES) Stormwater General Permit for Construction Activities. Depending on the timing of various phases of the project, it is likely that multiple permits will be required. For questions relating to either of these permit programs, the project proponents should contact DEQ’s Water Division (Ellen Gilinsky, telephone (804) 698-4375) or its Northern Virginia Regional Office (John Bowden, telephone (703) 583-3880).

2. Subaqueous Lands. The Marine Resources Commission has permit jurisdiction over any encroachments in, on, or over any state-owned rivers, streams, or creeks. If any portion of the project involves any encroachments channelward of ordinary high water along natural rivers and streams, a permit may be required from the Commission.

This permit, along with the Virginia Water Protection Permit, is included in the Joint Federal-State Permit Application (JPA) process by which permit applicants may apply for Corps of Engineers, DEQ, and Marine Resources Commission water resources permits with one application document. JPA forms and instructions are available from the Marine Resources Commission, and the JPA should be submitted to the Commission to initiate permit processing. Questions on Marine Resources Commission permits, or on the JPA process, may be addressed to the Commission (Tony Watkinson, telephone (757) 247-2200).
3. Erosion and Sediment Control; Stormwater Management. The Department of Conservation and Recreation encourages the proponents to contact DCR’s Potomac Watershed Office in Warrenton (telephone (540) 347-6420) to obtain plan development or implementation assistance so as to ensure project compliance during and after construction. In addition, the Northern Virginia Regional Commission offers a Guidebook for Maintaining BMPs in Northern Virginia from the Commission’s website (www.novaregion.org) or in paper, without charge (James Van Zee, telephone (703) 642-0700).


Soil suspected of contamination, and wastes that are generated, must be tested and disposed of in accordance with applicable Federal, State, and local laws and regulations, including but not limited to the Virginia Waste Management Act (Virginia Code sections 10.1-1400 et seq.), the Virginia Hazardous Waste Management Regulations (9 VAC 20-60 et seq.), and the Virginia Solid Waste Management Regulations (9 VAC 20-80 et seq.). (See the attached DEQ memo, Modena to Ellis, dated December 1, 2003 for additional citations.)

If the structures to be demolished as part of this project have not yet been checked for the presence of asbestos-containing materials or lead-based paint, the following guidance pertains in the event either of these substances is found.

(a) Asbestos Abatement. If asbestos-containing materials (ACM) are found, following their classification as friable or non-friable, all waste ACM shall be disposed of in accordance with the Virginia Solid Waste Management Regulations (9 VAC 20-80-640), and transported in accordance with the Virginia regulations governing Transportation of Hazardous Materials (9 VAC 20-110-10 et seq.). The project manager should contact the DEQ Waste Management Program (telephone (804) 698-4021) and the Department of Labor and Industry, Dr. Clarence Wheeling, telephone (804) 786-0574 for additional information.

(b) Lead-Based Paint. The project must comply with the U.S. Department of Labor, Occupational Safety and Health Administration (OSHA) regulations, and with the Virginia Lead-Based Paint Activities Rules and Regulations. For additional information regarding these requirements, the project manager should contact the Department of Professional and Occupational Regulation (Thomas Perry, telephone (804) 367-8595).
5. Historic Resources Coordination. To ensure proper coordination pursuant to Section 106 of the National Historic Preservation Act, the proponents should maintain contact with the Department of Historic Resources (Marc Holma, telephone (804) 367-2323, extension 112).

As mentioned above, Loudoun County (Marie Genovese, Planning Department, telephone (703) 777-0246) should be regarded as a consulting party for purposes of mitigation of impacts on cultural resources. The County requests that a copy of the Programmatic Agreement (see “Environmental Impacts and Mitigation,” item 6, above) be sent to its Planning Department (Attn: Marie Genovese, 1 Harrison Street, S.E., 3rd Floor, P.O. Box 7000, Leesburg, 20177).

6. Loudoun County. Planning and environmental questions relative to Loudoun County (see “Environmental Impacts and Mitigation,” items 3, 6, and 9(b), above) may be addressed to the Loudoun County Planning Department (Marie Genovese, telephone (703) 777-0246).

7. Federal Consistency under the Coastal Zone Management Act. Pursuant to the Coastal Zone Management Act of 1972, as amended, the applicant agency for federal licensing or permitting is required to certify the consistency of its activities affecting Virginia’s coastal resources or coastal uses with the Virginia Coastal Resources Management Program (VCP) (see section 307(c)(1) of the Act and the Federal Consistency Regulations at 15 CFR Part 930, sub-part D, section 930.57). This involves an analysis of the activities in light of the Enforceable Policies of the VCP (first enclosure), and submission of a consistency certification reflecting that analysis and committing the applicant agency to comply with the Enforceable Policies. DEQ also recommends careful consideration of the Advisory Policies of the VCP (second enclosure). The federal consistency certification may be provided as part of the documentation concluding the NEPA process (in this case the Final EIS), or independently, depending on the proponent agencies’ preference. Section 930.58 gives content requirements for the consistency certification. If you need clarification of these comments, please contact Charles Ellis of this Office at (804) 698-4488.

Thank you for the opportunity to review the SDEIS for this project.

Sincerely,

Ellie L. Irons
Program Manager
Office of Environmental Impact Review
Enclosures

cc: Keith R. Tignor, VDACS
    Derral Jones, DCR
    Thomas D. Modena, DEQ-Waste
    Kotur S. Narasimhan, DEQ-Air
    Ellen Gilinsky, DEQ-Water
    John D. Bowden, DEQ-NVRO
    Justin D. Worrell, MRC
    Marc E. Holma, DHR
    Catherine M. Harold, CBLAD
    R. N. Harrington, VDA
    James Van Zee, NVRC
    Kirby M. Bowers, Loudoun County
    Fred Selden, Fairfax County
    Calvin Grow, Town of Leesburg
    Mark Duceman, Town of Herndon
    Ron Carlee, Arlington County
    Daniel E. McKeever, City of Falls Church
    John H. Schoeberlein, Town of Vienna
    John M. Dittmaier, P.E., WMATA
    David V. Grimes, VDOT
    J. Michael Foreman, DOF
    Alan D. Weber, VDH
Attachment 1

**Enforceable Regulatory Programs comprising Virginia’s Coastal Resources Management Program (VCP)**

a. **Fisheries Management** - The program stresses the conservation and enhancement of finfish and shellfish resources and the promotion of commercial and recreational fisheries to maximize food production and recreational opportunities. This program is administered by the Marine Resources Commission (VMRC); Virginia Code §28.2-200 to §28.2-713 and the Department of Game and Inland Fisheries (DGIF); Virginia Code §29.1-100 to §29.1-570.

The State Tributyltin (TBT) Regulatory Program has been added to the Fisheries Management program. The General Assembly amended the Virginia Pesticide Use and Application Act as it related to the possession, sale, or use of marine antifouling paints containing TBT. The use of TBT in boat paint constitutes a serious threat to important marine animal species. The TBT program monitors boating activities and boat painting activities to ensure compliance with TBT regulations promulgated pursuant to the amendment. The VMRC, DGIF, and Virginia Department of Agriculture Consumer Services (VDACS) share enforcement responsibilities; Virginia Code §3.1-249.59 to §3.1-249.62.

b. **Subaqueous Lands Management** - The management program for subaqueous lands establishes conditions for granting or denying permits to use state-owned bottomlands based on considerations of potential effects on marine and fisheries resources, tidal wetlands, adjacent or nearby properties, anticipated public and private benefits, and water quality standards established by the Department of Environmental Quality (DEQ). The program is administered by the Marine Resources Commission; Virginia Code §28.2-1200 to §28.2-1213.

c. **Wetlands Management** - The purpose of the wetlands management program is to preserve wetlands, prevent their despoliation, and accommodate economic development in a manner consistent with wetlands preservation.

1. The tidal wetlands program is administered by the Marine Resources Commission; Virginia Code §28.2-1301 through §28.2-1320.

2. The Virginia Water Protection Permit program administered by DEQ includes protection of wetlands —both tidal and non-tidal; Virginia Code §62.1-44.15:5 and Water Quality Certification pursuant to Section 401 of the Clean Water Act.
Attachment 1 continued

Page 2

d. **Dunes Management** - Dune protection is carried out pursuant to The Coastal Primary Sand Dune Protection Act and is intended to prevent destruction or alteration of primary dunes. This program is administered by the Marine Resources Commission; Virginia Code §28.2-1400 through §28.2-1420.

e. **Non-point Source Pollution Control** – (1) Virginia's Erosion and Sediment Control Law requires soil-disturbing projects to be designed to reduce soil erosion and to decrease inputs of chemical nutrients and sediments to the Chesapeake Bay, its tributaries, and other rivers and waters of the Commonwealth. This program is administered by the Department of Conservation and Recreation; Virginia Code §10.1-560 et seq.

   (2) Coastal Lands Management is a state-local cooperative program administered by the Chesapeake Bay Local Assistance Department and 84 localities in Tidewater (see i) Virginia; Virginia Code §10.1-2100 –10.1-2114 and 9 VAC10-20 et seq.

f. **Point Source Pollution Control** - The point source program is administered by the State Water Control Board (DEQ) pursuant to Virginia Code §62.1-44.15. Point source pollution control is accomplished through the implementation of:

   (1) the National Pollutant Discharge Elimination System (NPDES) permit program established pursuant to Section 402 of the federal Clean Water Act and administered in Virginia as the Virginia Pollutant Discharge Elimination System (VPDES) permit program.

   (2) The Virginia Water Protection Permit (VWPP) program administered by DEQ; Virginia Code §62.1-44.15:5 and Water Quality Certification pursuant to Section 401 of the Clean Water Act.

g. **Shoreline Sanitation** - The purpose of this program is to regulate the installation of septic tanks, set standards concerning soil types suitable for septic tanks, and specify minimum distances that tanks must be placed away from streams, rivers, and other waters of the Commonwealth. This program is administered by the Department of Health (Virginia Code §32.1-164 through §32.1-165).

h. **Air Pollution Control** - The program implements the federal Clean Air Act to provide a legally enforceable State Implementation Plan for the attainment and maintenance of the National Ambient Air Quality Standards. This program is administered by the State Air Pollution Control Board (Virginia Code §10.1.1300 through §10.1-1320).

(i) **Coastal Lands Management** is a state-local cooperative program administered by the Chesapeake Bay Local Assistance Department and 84 localities in Tidewater, Virginia established pursuant to the Chesapeake Bay Preservation Act; Virginia Code §10.1-2100 –10.1-2114 and Chesapeake Bay Preservation Area Designation and Management Regulations; Virginia Administrative Code 9 VAC10-20 et seq.
Attachment 2

Advisory Policies for Geographic Areas of Particular Concern

a. **Coastal Natural Resource Areas** - These areas are vital to estuarine and marine ecosystems and/or are of great importance to areas immediately inland of the shoreline. Such areas receive special attention from the Commonwealth because of their conservation, recreational, ecological, and aesthetic values. These areas are worthy of special consideration in any planning or resources management process and include the following resources:

   a) Wetlands  
   b) Aquatic Spawning, Nursery, and Feeding Grounds  
   c) Coastal Primary Sand Dunes  
   d) Barrier Islands  
   e) Significant Wildlife Habitat Areas  
   f) Public Recreation Areas  
   g) Sand and Gravel Resources  
   h) Underwater Historic Sites.

b. **Coastal Natural Hazard Areas** - This policy covers areas vulnerable to continuing and severe erosion and areas susceptible to potential damage from wind, tidal, and storm related events including flooding. New buildings and other structures should be designed and sited to minimize the potential for property damage due to storms or shoreline erosion. The areas of concern are as follows:

   i) Highly Erodible Areas  
   ii) Coastal High Hazard Areas, including flood plains.

c. **Waterfront Development Areas** - These areas are vital to the Commonwealth because of the limited number of areas suitable for waterfront activities. The areas of concern are as follows:

   i) Commercial Ports  
   ii) Commercial Fishing Piers  
   iii) Community Waterfronts

Although the management of such areas is the responsibility of local government and some regional authorities, designation of these areas as Waterfront Development Areas of Particular Concern (APC) under the VCRMP is encouraged. Designation will allow the use of federal CZMA funds to be used to assist planning for such areas and the implementation of such plans. The VCRMP recognizes two broad classes of priority uses for waterfront development APC:

   i) water access dependent activities;  
   ii) activities significantly enhanced by the waterfront location and complementary to other existing and/or planned activities in a given waterfront area.
Advisory Policies for Shorefront Access Planning and Protection

a. Virginia Public Beaches - Approximately 25 miles of public beaches are located in the cities, counties, and towns of Virginia exclusive of public beaches on state and federal land. These public shoreline areas will be maintained to allow public access to recreational resources.

b. Virginia Outdoors Plan - Planning for coastal access is provided by the Department of Conservation and Recreation in cooperation with other state and local government agencies. The Virginia Outdoors Plan (VOP), which is published by the Department, identifies recreational facilities in the Commonwealth that provide recreational access. The VOP also serves to identify future needs of the Commonwealth in relation to the provision of recreational opportunities and shoreline access. Prior to initiating any project, consideration should be given to the proximity of the project site to recreational resources identified in the VOP.

c. Parks, Natural Areas, and Wildlife Management Areas - Parks, Wildlife Management Areas, and Natural Areas are provided for the recreational pleasure of the citizens of the Commonwealth and the nation by local, state, and federal agencies. The recreational values of these areas should be protected and maintained.

d. Waterfront Recreational Land Acquisition - It is the policy of the Commonwealth to protect areas, properties, lands, or any estate or interest therein, of scenic beauty, recreational utility, historical interest, or unusual features which may be acquired, preserved, and maintained for the citizens of the Commonwealth.

e. Waterfront Recreational Facilities - This policy applies to the provision of boat ramps, public landings, and bridges which provide water access to the citizens of the Commonwealth. These facilities shall be designed, constructed, and maintained to provide points of water access when and where practicable.

f. Waterfront Historic Properties - The Commonwealth has a long history of settlement and development, and much of that history has involved both shorelines and near-shore areas. The protection and preservation of historic shorefront properties is primarily the responsibility of the Department of Historic Resources. Buildings, structures, and sites of historical, architectural, and/or archaeological interest are significant resources for the citizens of the Commonwealth. It is the policy of the Commonwealth and the VCRMP to enhance the protection of buildings, structures, and sites of historical, architectural, and archaeological significance from damage or destruction when practicable.
If you cannot meet the deadline, please notify CHARLIE ELLIS at 804/698-4488 prior to the date given. Arrangements will be made to extend the date for your review if possible. An agency will not be considered to have reviewed a document if no comments are received (or contact is made) within the period specified.

REVIEW INSTRUCTIONS:

A. Please review the document carefully. If the proposal has been reviewed earlier (i.e. if the document is a federal Final EIS or a state supplement), please consider whether your earlier comments have been adequately addressed.

B. Prepare your agency's comments in a form which would be acceptable for responding directly to a project proponent agency.

C. Use your agency stationery or the space below for your comments. IF YOU USE THE SPACE BELOW, THE FORM MUST BE SIGNED AND DATED.

Please return your comments to:

MR. CHARLES H. ELLIS III
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL IMPACT REVIEW
629 EAST MAIN STREET, SIXTH FLOOR
RICHMOND, VA 23219
FAX # 804/698-4319

RECEIVED
DEC 16 2003
DEQ-Office of Environmental Impact Review

COMMENTS

Statements in the project document concerning endangered species were reviewed and compared to available information. No additional comments are necessary in reference to endangered plant and insect species regarding this project.

(name)
(Keith R. Tignor)
(signed)
(date) December 8, 2003
(title) Endangered Species Coordinator
(agency) VDACS, Office of Plant and Pest Service

PROJECT # 03-210F
COMMONWEALTH of VIRGINIA
DEPARTMENT OF CONSERVATION AND RECREATION
203 Governor Street
Richmond, Virginia 23219-2010
TDD (804) 786-2121

MEMORANDUM

Date: 25 November 2003
To: Charles H. Ellis, III, Virginia Department of Environmental Quality

From: Derral Jones, Planning Bureau Manager

Subject: DEQ#03-210F: Dulles Corridor Rapid Transit Project, Alternative and Construction Phasing

The Department of Conservation and Recreation (DCR) functions to preserve and protect the environment of the Commonwealth of Virginia and advocate the wise use of its scenic, cultural, recreation and natural heritage resources. Natural heritage resources are defined as the habitat of rare, threatened, or endangered plant and animal species, state unique or exemplary natural communities, significant geologic formations and similar features of scientific interest.

DCR has searched its Biotics Data System for occurrences of natural heritage resources from the area outlined on the submitted maps. According to the information currently in our files, natural heritage resources have been documented in the project area. However, due to the scope of the activity and the distance to the resources, we do not anticipate that this project will adversely impact these natural heritage resources.

In addition, no State Natural Areas under DCR’s jurisdiction are in the project vicinity.

Under a Memorandum of Agreement between the Virginia Department of Agriculture and Consumer Services (VDACS) and the Virginia Department of Conservation and Recreation, DCR represents VDACS in comments regarding potential impacts on state-listed threatened and endangered plants and insects. The current activity will not affect any documented state-listed plants or insects.

Conserving Virginia’s Natural and Recreational Resources
Any absence of data may indicate that the project area has not been surveyed, rather than confirm that the area lacks other natural heritage resources. New and updated information is continually added to Biotics. Please contact DCR for an update on this natural heritage information if a significant amount of time passes before it is utilized.

Please note that federal agencies and their authorized agents conducting regulated land disturbing activities on private and public lands in the state must comply with the Virginia Erosion and Sediment Control Law and Regulations (VESCL&R), Virginia Stormwater Management Law and Regulations (VSWML&R), and other applicable federal non-point source pollution mandates (e.g., Clean Water Act-Section 313, Federal Consistency under the Coastal Zone Management Act). Clearing and grading activities, installation of staging areas, parking lots, roads, buildings, utilities, or other structures, soil/dredge spoil areas, or related land conversion activities that disturb 2,500 square feet or more would be regulated by VESCL&R and those that disturb one acre or greater would be covered by VSWML&R. Accordingly, federal agencies should prepare and implement erosion and sediment control (ESC) and stormwater management (SWM) plans to ensure compliance with state law. The sponsoring federal agency is ultimately responsible for achieving project compliance through oversight of on site contractors, regular field inspection, prompt action against non-compliant sites, and/or other mechanisms consistent with agency policy. We highly encourage the sponsoring agency to contact DCR’s Potomac Watershed Office (540-347-6420) to obtain plan development or implementation assistance to ensure project conformance during and after active construction. [Reference: VESCL §10.1-567; VSWML §10.1-603.15]

Regarding recreation facilities, this study does a thorough job of addressing the crossing impacts on the W & OD trail. We encourage continued consultation with the Northern Virginia Regional Park Authority regarding the W&OD trail. Please note that there is a future greenway/trail in the area that is not addressed in the document. As presented, the corridor will cross the proposed Fairfax Cross Country Trail which will connect the Great Falls National Park with Ft. Belvoir. Consideration and accommodation for this trail should be addressed in the final plans. We recommend coordination with the local trail and greenways representatives and the Fairfax County Park Authority.

Thank you for the opportunity to offer comments on this project.
MEMORANDUM

TO: Charles Ellis

FROM: Thomas Modena

DATE: December 1, 2003

COPIES: Kevin Greene

SUBJECT: Revised Supplemental Draft Environmental Impact Statement Dulles Corridor Rapid Transit Project

The Waste Division has reviewed the Revised Draft Environmental Impact Statement for the Federal Transit Administration's Dulles Corridor Rapid Transit Project. We have the following comments concerning the waste issues associated with this project.

Solid and hazardous waste issues and sites were addressed in the report. The central office of the Waste Division did a cursory review of its data files and did not find any additional sites that might impact this project.

Any soil 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 20-80); 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 Parts 107, 171.1-172.558.

The report states that structures that will be demolished would be checked for the presence of asbestos-containing materials (ACM) or lead-based paint (LBP). If LBP or ACM
are found, in addition to the Federal waste-related regulations, State regulations 9VAC 20-80-640 for ACM and 9VAC 20-60-261 for LBP must be followed.

Finally, pollution prevention was not addressed in the report. VDEQ encourages all construction projects and facilities to implement pollution prevention principles, including the reduction, reuse, and recycling of all solid wastes generated.

If you have any questions or need further information, please let me know.
DEPARTMENT OF ENVIRONMENTAL QUALITY  
DIVISION OF AIR PROGRAM COORDINATION

ENVIRONMENTAL REVIEW COMMENTS APPLICABLE TO AIR QUALITY

J: Charles H. Ellis III  
DEQ - OEIA PROJECT NUMBER: 03 – 210F

PROJECT TYPE:  
☐ STATE EA / EIR / FONSI  ☑ FEDERAL EA / EIS  ☐ SCC  
☐ CONSISTENCY DETERMINATION/CERTIFICATION

PROJECT TITLE: DULLES CORRIDOR RAPID TRANSIT PROJECT

PROJECT SPONSOR: USDOT / FEDERAL TRANSIT ADMINISTRATION / VDRPT / WMATA / FAA

PROJECT LOCATION:  
☒ OZONE NON ATTAINMENT AREA  
☐ OZONE MAINTENANCE AREA  
☒ STATE VOLATILE ORGANIC COMPOUNDS & NITROGEN OXIDES EMISSION CONTROL AREA

REGULATORY REQUIREMENTSMAY BE APPLICABLE TO:  
☒ CONSTRUCTION  
☐ OPERATION

STATE AIR POLLUTION CONTROL BOARD REGULATIONS THAT MAY APPLY:

1. ☐ 9 VAC 5-40-5200 C & 9 VAC 5-40-5220 E – STAGE I
2. ☐ 9 VAC 5-40-5200 C & 9 VAC 5-40-5220 F – STAGE II Vapor Recovery
3. ☐ 9 VAC 5-40-5490 et seq. – Asphalt Paving operations
   ☜ 9 VAC 5-40-5600 et seq. – Open Burning
4. ☐ 9 VAC 5-40-50-60 et seq. Fugitive Dust Emissions
5. ☐ 9 VAC 5-50-130 et seq. - Odorous Emissions; Applicable to ______________________
6. ☐ 9 VAC 5-50-160 et seq. – Standards of Performance for Toxic Pollutants
7. ☐ 9 VAC 5-50-400 Subpart_____ Standards of Performance for New Stationary Sources, designates standards of performance for the______________________________
8. ☐ 9 VAC 5-80-10 et seq. of the regulations – Permits for Stationary Sources
9. ☐ 9 VAC 5-80-1700 et seq. Of the regulations – Major or Modified Sources located in PSD areas. This rule may be applicable to the ________________________________
10. ☐ 9 VAC 5-80-2000 et seq. of the regulations – New and modified sources located in non-attainment areas
11. ☐ 9 VAC 5-80-800 et seq. Of the regulations – Operating Permits and exemptions. This rule may be applicable to ________________________________

COMMENTS SPECIFIC TO THE PROJECT:

Earlier comment on this project to restrict the emissions of volatile organic compounds (VOC) and oxides of nitrogen (NOx) during construction phase is reiterated.

[Signature]

DATE: November 10, 2003

Kotur S. Narasimhan
Office of Air Data Analysis
Memorandum

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY
WATER DIVISION
Larry G. Lawson, P.E., Director

To: Charles H. Ellis III
    Environmental Program Planner

From: Ellen Gilinsky, Ph.D., PWS
      VWP Permit Program Manager

Date: November 17, 2003

Subject: Dulles Corridor Rapid Transit Project
         USDOT/Federal Transit Administration/VDRPT/WMATA/FAA
         Project Number 03-210F

Received: Nov 17 2003

DEQ-Div. of Environmental
Enhancement

On behalf of the DEQ-Water Division, we have reviewed the Supplemental Draft Environmental Impact Statement and Section 4(f) Evaluation regarding the proposed roadway improvement project in Fairfax and Loudoun Counties, Virginia. Site activities will include the extension of mass transit service through the Dulles corridor. Specifically, the Locally Preferred Alternative (LPA) includes extension of existing regional Metrorail system in Fairfax County and into eastern Loudoun County, including Tysons Corner and Washington Dulles International Airport.

The report states that the new rail lines will be primarily within the medians of the existing roads. We commend this surface water avoidance and impact minimization strategy. The full LPA is projected to impact up to 4.9 acres of wetlands and 245 linear feet of streams. Phase I has significantly less impacts to surface waters. A VWP Permit may be required. The project proponent should prepare and submit a Joint Permit Application to the VMRC for review and coordination by federal and state agencies. Please coordinate with the DEQ Central Office for final permit determination. Please continue to explore ways to further avoid and minimize impacts to surface waters as you enter the design phase of your project. Examples of avoidance and minimization efforts include completely spanning wetlands and streams to avoid impact and shifting the alignment to avoid or minimize surface water impacts. The selected alternative’s unavoidable impacts to wetlands and streams will require full compensatory mitigation as explained in the report, including permanent conversion from one wetland type to another of lesser value. We recommend strict adherence to erosion and stormwater management practices and further encourage the project proponent to monitor construction activities to make certain that erosion and stormwater management practices are adequately preventing sediment and pollutant migration into adjacent surface waters. Provided all applicable permits are obtained, the project should be consistent with the VWP Program.
NVROs comments regarding the EIS for the Dulles Corridor Rapid Transit Project submitted by USDOT/Federal Transit Administration are as follows:

1. The Dulles Corridor Rapid Transit project as presented proposes to impact 4.9 acres of wetlands and 245 linear feet of stream channel. The proposed impacts will require a permit in accordance with the 9 VAC 25-210-10 et seq. Virginia Water Protection Permit Program Regulation. Compensatory mitigation for all impacts to state waters will require review and approval by DEQ in accordance with 9 VAC 25-210-10 et seq. Virginia Water Protection Permit Program Regulation.

2. The report looks good with regard to water quality impacts. Do not see any mention of permitting for stormwater discharges or discussion of mitigation of stormwater from the rail lines once they are constructed and operating. Do they anticipate using oil/water separators where the cars are stored?

3. The project(s) as described will involve land disturbance/construction activities on large areas of land, primarily within the medians of the Dulles Connector Road, DIAAH, and Dulles Greenway. VPDES permit coverage for stormwater discharges associated with construction activity will be required. Depending on the timing and implementation of the various phases of the plan, it is likely that multiple permits will be needed. Land disturbance activities in excess of one acre require VPDES permit coverage for stormwater discharges. Conformance with state and local sediment and erosion control and stormwater management programs should minimize short term impacts to water quality.

4. The plan to construct the subject project, as described, appears to have adequately addressed potential air pollution impacts. It should be noted that this document references an earlier draft EIS with regard to the substantial details, but the general text provided satisfies the substantial requirements for fugitive dust control (the main issue from an air standpoint).

John D. Bowden
Deputy Regional Director
Department of Environmental Quality
Northern Virginia Regional Office
(703) 583-3880
jdbowden@deq.state.va.us
If you cannot meet the deadline, please notify CHARLIE ELLIS at 804/698-4488 prior to the date given. Arrangements will be made to extend the date for your review if possible. An agency will not be considered to have reviewed a document if no comments are received (or contact is made) within the period specified.

REVIEW INSTRUCTIONS:

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B. Prepare your agency's comments in a form which would be acceptable for responding directly to a project proponent agency.

C. Use your agency stationery or the space below for your comments. IF YOU USE THE SPACE BELOW, THE FORM MUST BE SIGNED AND DATED.

Please return your comments to:

MR. CHARLES H. ELLIS III
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL IMPACT REVIEW
629 EAST MAIN STREET, SIXTH FLOOR
RICHMOND, VA 23219
FAX #804/698-4319

RECEIVED

NOV 07 2003

DEQ Office of Environmental Impact Review

COMMENTS

This will acknowledge receipt of your telefax transmittal letter with enclosures requesting Commission review of the above-referenced project.

Please be advised that the Marine Resources Commission pursuant to Section 28.2-1204 of the Code of Virginia has jurisdiction over any encroachments in, on, or over any State-owned rivers, streams, or creeks in the Commonwealth. Accordingly, if any portion of the subject projects involves any encroachments channelward of ordinary high water along natural rivers and streams, a permit may be required from our agency.

(signed)                      (date) 11/6/03
(Title)                      Environmental Engineer
(Agency)                     Marine Resources Commission

PROJECT # 03-210F            8/98
If you cannot meet the deadline, please notify CHARLIE ELLIS at 804/698-4488 prior to the date given. Arrangements will be made to extend the date for your review if possible. An agency will not be considered to have reviewed a document if no comments are received (or contact is made) within the period specified.

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OFFICE OF ENVIRONMENTAL IMPACT REVIEW
629 EAST MAIN STREET, SIXTH FLOOR
RICHMOND, VA 23219
FAX #804/698-4319

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DEC 01 2003

DEQ-Office of Environmental Impact Review

COMMENTS

Enclosed please find a copy of a recent review letter sent to Mr. Robue (DEQ) regarding the Dulles Corridor Rapid Transit Project. We request that DEQ require the applicant to continue consultation with DHR pursuant to Section 106 of the NHPA.

(signed) [signature]

(date) 24 Nov 03

(title) Architectural Historian

(agency) DHR

PROJECT # 03-210F

DHR # 2000-1061
COMMONWEALTH of VIRGINIA

Department of Historic Resources
2801 Kensington Avenue, Richmond, Virginia 23221

November 19, 2003

Mr. Karl A. Rohrer
Virginia Department of Rail and Public Transportation
1550 Wilson Boulevard
Suite 300
Arlington, Virginia 22209

Re: Dulles Corridor Rapid Transit Project
Supplemental Draft Environmental Impact Statement (EIS)
Fairfax and Loudoun Counties
DHR File # 2000-1061

Dear Mr. Rohrer:

We have received your request for our review and comment on the Environmental Impact Statement (EIS) regarding the above referenced project. The document attempts to address the environmental affects that the proposed construction of the 23-mile high-capacity transit line will have to include those on historic properties. Please accept the following comments as our response to the current EIS.

The subject document attempts to address “the potential long-term and construction effects” of the Dulles Corridor Rapid Transit Project for the Local Preferred Alternative (LPA). The EIS evaluates the effects of the project on two archaeological sites (44FX2662 and 44FX2405) and an historic district (Hunter Mill Road Historic District) newly added for consideration since the last draft EIS. Additionally, the current EIS re-considers effects on the Washington Dulles International Airport, a property eligible for listing in the National Register of Historic Resources, and a House located at 22017 Shellhorn Road in Ryan.

The revised EIS asserts that there would be no adverse effect to architectural resources as a result of the LPA. We cannot concur with this statement. The project corridor crosses the boundary of the Hunter Mill Road Historic District. Despite the claim that “because the Hunter Mill Road Historic District is located within an existing transportation corridor, impacts to the district associated with this project would be minimal,” you have not provided the Department of Historic Resources (DHR) sufficient information in order for us to agree with this statement. Similarly, the report cites “further analysis” confirming that the proposed LPA would not cause an adverse visual effect on the “peekaboo” sequence along the approach to Dulles Airport. We have not had the opportunity to review and comment on the aforementioned analysis. Therefore, we cannot agree that your assertion is correct. In fact, the issue of an appropriate National Register boundary for the airport is still an outstanding issue that must be settled before the discussion of effect can happen.
If you cannot meet the deadline, please notify CHARLIE ELLIS at 804/698-4488 prior to the date given. Arrangements will be made to extend the date for your review if possible. An agency will not be considered to have reviewed a document if no comments are received (or contact is made) within the period specified.

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C. Use your agency stationery or the space below for your comments. **IF YOU USE THE SPACE BELOW, THE FORM MUST BE SIGNED AND DATED.**

Please return your comments to:

MR. CHARLES H. ELLIS III  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
OFFICE OF ENVIRONMENTAL IMPACT REVIEW  
629 EAST MAIN STREET, SIXTH FLOOR  
RICHMOND, VA 23219  
FAX #804/698-4319

**RECEIVED**

DEC 04 2003

**COMMENTS**

We have no additional comments beyond those we made on 1/31/02.

(signed) [Signature]  
(date) 12/21/03  
(title) CHIEF, ENVIRONMENTAL ENGINEERING DIV.  
(agency) CBLAD

PROJECT # 03-210F  

8/98
November 4, 2003

Mr. Karl Rohrer, Project Manager
Virginia Department of Rail and Public Transportation
1550 Wilson Boulevard, Suite 300
Arlington, VA 22209

Re: Dulles Corridor Rapid Transit Project Draft EIS

Dear Mr. Rohrer:

The Northern Virginia Regional Commission staff has reviewed the document described above and has the following comments.

Please be advised that Fairfax County and the Town of Herndon have enacted jurisdiction-wide Chesapeake Bay Resource Management Area (RMA) designation. This RMA designation requires that all development result in a no-net-increase standard for phosphorus loadings, based on the jurisdiction’s average imperviousness.

Special attention should be given to post-construction stormwater quality management. The developing agency must adhere to the post-development water quality requirements set forth by the Virginia Stormwater Management Regulations (VR 215-02-00 Part IV and §2.3). Meeting the Virginia Stormwater Management Regulations should comply with the requirement that state agencies meet the local ordinances pursuant to the Virginia Chesapeake Bay Act.


We would also suggest that, where possible, opportunities for retrofit of existing stormwater quantity facilities to stormwater quality facilities through new construction activities should be explored. NVRC’s Guidebook for Maintaining BMPs in Northern Virginia is available, without charge, should you need it, and can also be downloaded from our website, or call me if you would like to receive a copy to use as a reference.

A copy of this letter should be included with your submission to indicate that the review by this agency has been completed.

Your cooperation in the intergovernmental review process is appreciated.

Sincerely yours,

James Van Zee
Director, Regional Planning Services
If you cannot meet the deadline, please notify CHARLIE ELLIS at 804/698-4488 prior to the date given. Arrangements will be made to extend the date for your review if possible. An agency will not be considered to have reviewed a document if no comments are received (or contact is made) within the period specified.

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DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL IMPACT REVIEW
629 EAST MAIN STREET, SIXTH FLOOR
RICHMOND, VA 23219
FAX #804/698-4319

[Signature]

CHARLES H. ELLIS III
ENVIRONMENTAL PROGRAM PLANNER

COMMENTS

NO Comments

(signed)    (date)  11/26/05
(title)     Transportation Engr.
-agency)    Town of Leesburg

PROJECT # 03-210F  8/98.
December 9, 2003

Mr. Charles H. Ellis III
Department of Environmental Quality
Office of Environmental Impact Review
629 East Main Street, Sixth Floor
Richmond, VA 23219

Mr. Karl Rohrer, Project Manager
Virginia Department of Rail and Public Transportation
1550 Wilson Boulevard, Suite 300
Arlington, VA 22209

Re: Supplemental Draft Environmental Impact Statement and Section 4(f) Evaluation, Dulles Corridor Rapid Transit Project (Hearing No. 160, Docket R03-6)

Dear Mr. Ellis,

Thank you for the opportunity to comment on the above referenced project. The Revised Countywide Transportation Plan (CTP), adopted on July 23, 2001, identifies the Dulles Corridor Rapid Transit Project as one of the County’s and Region’s priority transportation projects (CTP, text, p. 2-3). Additionally, the County’s Revised General Plan policies encourage transit-supportive development at planned transit nodes (Revised General Plan, pp. 6-22 to 6-27).

The County’s Bicycle and Pedestrian Mobility Master Plan (Bike/Ped Plan) was adopted on October 20, 2003. Please note that this document outlines policies establishing the need for high quality bicycle and pedestrian access to the future transit stations (Bike/Ped Plan, Transit and Demand Management Policies, p. 35). The County wishes to ensure that well designed bicycle and pedestrian access will be provided through the transit stations providing access to development on both sides of the Greenway. The County wishes to be a consulting party as the design program is further developed.

I have outlined by section and topic my comments below:

Section 1.3 Planning Context: Paragraph 2 notes the Countywide Transportation Plan this should be changed to the Revised Countywide Transportation Plan (2001).

Section 1.3 Planning Context: It should be noted that the Revised General Plan allows for up to 50 dwelling units per acre when rail transit and facilities are planned, scheduled, designed and fully funded to serve the area designated as a Transit-Oriented Development (TOD) (Revised General Plan, Policy 12c, p. 6-25). The TOD is located between the Loudoun County Parkway and Route 772 interchanges (Revised General Plan, text, p. 6-22). The transit node proposed for the Route 606 station is planned for a Transit-Related Employment Center (TREC), planned for concentrated employment use or Special Activity destination.
Section 1.3 Planning Context: The last sentence on page 1-7 should be edited to read "The Loudoun County Revised Countywide Transportation Plan also includes public support for transit services that would use the corridor, such as carpools, vanpools, bus and rail services, and other alternative modes, with specific funding support for bus services."

Section 2.2.4: Comparative Evaluation of Alternatives: County staff questions the evaluation of alternatives using a 2025 forecast horizon year. Results for the full LPA should use a broader forecast horizon year given that the full build LPA would be in operation by 2015. County staff does not feel that a 10 year forecast horizon provides an adequate description.

Section 3.1 Land Use: The total amount of development for Moorefield Station in this section is incorrect. Moorefield Station was approved for 10,750,000 square feet of non-residential development and 6,750 residential units.

Section 3.1.1.2.B. Proposed LPA Phase I: It should be noted that the Revised General Plan also supports the extension of rail facilities to the Dulles Airport (Revised General Plan, text, p. 4-8). Therefore, the proposed LPA Phase 1 is not consistent with the Revised General Plan because it would not provide rapid transit to Dulles International Airport and the Route 606 and Route 772 station areas.

Section 3.2.1.2.B. Proposed LPA Phase I: County staff asks that the first sentence on page 3-20 be clarified. "If the proposed LPA were not constructed in its entirety by 2025, neighborhoods located west of the Wiehle Avenue station area would not receive mobility benefits from access to Metrorail service during the proposed LPA Phase 1." Metrorail service is not planned to extend west of Wiehle Avenue as part of proposed LPA Phase 1.

Section 3.4 Visual and Aesthetic Conditions: This section states that a site plan has been approved for the Moorefield Station development. This statement is incorrect; the rezoning has been approved for Moorefield Station however, no site plans have been approved at this time.

Section 3.5 Cultural Resources: The County should continue to be a consulting party as impact mitigation strategies are discussed. Additionally, the Area of Potential Effect (APE) was defined as 200 feet beyond station footprints to allow for possible variation during construction. The County should be contacted if variations to the proposed alignment will impact additional sites.

Please forward a copy of the Programmatic Agreement from the State Historic Preservation Officer (SHPO) to:

Loudoun County Planning Department
c/o Marie Genovesa
1 Harrison St., S.E., 3rd Floor
P.O. Box 7000
Leesburg, VA 20177-7000
Section 3.6.3 Mitigation: The document states that temporary construction impacts at the Moorefield Station recreation center and athletic fields will be mitigated, but does not provide any information as to how impacts will be mitigated.

Section 4.1.1.2A Proposed Full LPA: The total amount of development for Moorefield Station in this section is incorrect. Moorefield Station was approved for 10,750,000 square feet of non-residential development and 6,750 residential units.

Section 4.2 Water Resources: The County’s Revised 1993 Zoning Ordinance was adopted on January 6, 2003 implementing many of the policies outlined in the Revised General Plan. The River and Stream Corridor Overlay District (RSCOD) was established with the revisions to the Zoning Ordinance (Section 4-2000). River and Stream Corridor Resources include:

a. "Rivers and streams draining 100 acres or more.

b. 100-year floodplains (including major and minor).

c. Adjacent steep slopes (slope 25 percent or greater, starting within 50 feet of streams and floodplains, extending no farther than 100 feet beyond the originating stream or floodplain).

d. 50-foot Management Buffer surrounding the floodplains and adjacent steep slopes.

e. Wetlands, forests, historic and cultural resources, and archaeological sites that fall within the area of one or more of the above elements" (Revised General Plan, Policy 2, p. 5-6).

Additionally, a 300-foot no-build buffer or the RSCOD, whichever is greater will be applied to scenic rivers, the Potomac River, the Bull Run, and the protected shoreline of drinking water reservoirs (Revised General Plan, Policies 1, 8 & 11, pp. 5-11 & 5-17). Please ensure that all the elements of the RSCOD have been taken into account when determining impacts to water resources.

Section 4.2.3 Mitigation: Coordination with local jurisdictions regarding mitigation for the nonconformity of any project elements within critical areas is listed as an available option. County staff considers this to be a requirement for any element of the project that impacts the RSCOD.

Section 4.2.3 Mitigation: The County supports the federal goal of no net loss to wetlands and will identify optimum receiving sites with a priority given to each geographic Policy Area (Revised General Plan, Policy 23, p. 5-8). Therefore, the County prefers any wetland impacts incurred in Loudoun County from the proposed project be mitigated within the Suburban Policy Area. However, if a wetland mitigation bank is not available within the Suburban Policy Area at the time the impacts are incurred County staff prefers that impacts to wetlands within Loudoun County be mitigated at the Bull Run Wetland Bank as shown on Figure 4.2-2.

Section 9.2.1.2B. Proposed LPA Phase 1: This section states that changes in land use under the proposed LPA and proposed LPA Phase 1 would be most dramatic in Loudoun County, where land use that is currently rural in nature would be converted to mixed-use suburban centers. It should be noted that the proposed alignment for the Dulles Corridor Rapid Transit Project is located in the
Suburban Policy Area as defined by the Revised General Plan and is planned for suburban-scale residential and non-residential development (Revised General Plan, Chapter 6).

County staff anticipates the Board of Supervisors to adopt a Resolution regarding the proposed project on December 15, 2003, at which time it will be forwarded to the Department of Rail and Public Transportation to be added to the public record.

If you have any questions regarding these comments please contact Marie Genovese, Planner in the Department of Planning at (703) 777-0246.

Sincerely,

[Signature]

Kip M. Bowers
County Administrator

cc: Linda Neri, Deputy County Administrator
Julie Pastor, Planning Director
Sarah Coyle, Community Planning Division Manager
Mark Moszak, Environmental and Historic Programs Administrator
Marie Genovese, Community Planning
Mr. Corey W. Hill,

Thank you for addressing our comments regarding water quality and water permitting issues including impacts to wetlands and streams. We appreciate your thorough consideration of our comments. Please continue to investigate ways to reduce the project's impact on state waters. Please contact us with any questions and information on the development of your project.

Sincerely,
Wendy Kedzierski
Environmental Specialist
Virginia Department of Environmental Quality
Virginia Water Protection Permit Program
(804) 698-4503
FAX (804) 698-4347
wmkedziers@deq.state.va.us
Mr. Corey Hill  
Northern Virginia Rail Manager  
Virginia Department of Rail and Public Transportation  
1550 Wilson Boulevard, Suite 300  
Arlington, Virginia 22209  

RE: Draft Environmental Impact Statement and Section 4(f) Evaluation, Dulles Corridor Rapid Transit Project  
DEQ-02-124F  

Dear Mr. Hill:  

The Commonwealth of Virginia has completed its review of the Draft Environmental Impact Statement (Draft EIS) described above. The Department of Environmental Quality is responsible for coordinating Virginia’s review of federal environmental documents and responding to appropriate federal officials on behalf of the Commonwealth. The following agencies took part in this review:  

Department of Environmental Quality  
Department of Conservation and Recreation  
Department of Transportation  
Marine Resources Commission  
Department of Historic Resources  
Department of Mines, Minerals, and Energy  
Department of Forestry  
Chesapeake Bay Local Assistance Department.  

In addition, the Department of Game and Inland Fisheries, Virginia Economic Development Partnership, the Northern Virginia Regional Commission, and Fairfax and Loudoun Counties were invited to comment.
Project Description

According to the Draft EIS, the Federal Transit Administration and the Washington Metropolitan Area Transit Authority, in cooperation with the Federal Aviation Administration, are joining the Department of Rail and Public Transportation in proposing alternative transit improvements in the Dulles Corridor. This corridor runs from the East Falls Church Metrorail station in Fairfax County past Tysons Corner to Dulles Airport and into Loudoun County. (Page S-1).

The “baseline” or “no-build” alternative consists of existing highway and transit infrastructure and services, and any that are committed for implementation by the year 2025 (Draft EIS, page 2-4, section 2.2). The four “build” alternatives are:

- **“BRT” (bus rapid transit) Alternative: Buses, operated more like trains (separate stations, off-board ticketing, etc.) would connect the West Falls Church Metrorail station with Route 772 and the Dulles Greenway in Loudoun County, west of the Airport. The Draft EIS presents three alignment options. (Pages 2-14 through 2.19 and Figures 2.3-1a and 2.3-1b, section 2.3).**

- **Metrorail Alternative: The Metrorail system would be extended from a point between the East and West Falls Church stations to Route 772, by way of a number of track and station alignment options, and ancillary facilities would be included (Draft EIS, pages 2-32 through 2-58, section 2.3.2).**

- **BRT-Metrorail Alternative: The Metrorail system would be extended from a point between the East and West Falls Church stations to Tysons Corner, after which the bus rapid transit would operate to Route 772. Again, different alignments would be considered (Draft EIS, page 2-58, section 2.3.3).**

- **Phased Implementation Alternative: Metrorail would be phased in throughout the corridor (West Falls Church metro station to Route 772) by first extending bus rapid transit, then replacing it with Metro to Tysons Corner and later replacing it to Route 772 (Draft EIS, page 2-14, section 2.3).**

Environmental Impacts and Mitigation

The Commonwealth of Virginia has no objection to any of the “build” alternatives. It appears to us that any of the “build” alternatives would be preferable to the no-action alternative, given the widely acknowledged beneficial air quality impacts of improved mass transit, particularly in the Northern Virginia ozone non-attainment area.
1. Natural Heritage and Wildlife Resources. According to the Department of Conservation and Recreation (DCR), "natural heritage resources" are defined as the habitat of rare, threatened, or endangered plant and animal species, unique or exemplary natural communities, and significant geological formations. According to DCR files, several rare plants may occur in project locations if suitable habitat is present. These plants are typically associated with prairie vegetation and inhabit semi-open diabase glades in Virginia. Diabase glades are characterized by historically fire-dominated grassland vegetation on relatively nutrient-rich soils underlain by Triassic bedrock. Diabase flatrock, a hard, dark-colored volcanic rock, is found primarily in northern Virginia and located within the geologic formation known as the Triassic Basin. Where the bedrock is exposed, a distinctive community type of drought-tolerant plant occurs. Diabase flatrocks are extremely rare natural communities that are threatened by activities such as quarrying and road construction.

In Northern Virginia, diabase supports occurrences of several globally rare and state rare plant species (see the "Definition of Abbreviations" on pages 2 and 3 of the attached August 1, 2002 comments from DCR). These include:

- earleaf foxglove (Agalinis auriculata)
- white heat aster (Aster ericoides)
- blue-hearts (Buchnera americana)
- hairy beardtongue (Penstemon hirsutus)
- downy phlox (Phlox pilosa)
- stiff goldenrod (Oligoneuron rigidum var. rigidum)
- marsh hedgenettle (Stachys pilosa var. arenicola).

The earleaf foxglove is currently tracked as a species of concern by the U.S. Fish and Wildlife Service; however, this designation has no legal status, according to DCR.

Because the project corridor has the potential to support populations of these natural heritage resources, DCR recommends an inventory of suitable habitat in the study area. With the survey results, DCR can more accurately evaluate potential resource impacts and recommend specific protection measures to minimize the impacts. In this regard, the Department of Conservation and Recreation's Division of Natural Heritage employs biologists who are qualified and available to conduct inventories for rare, threatened, and endangered species. We recommend that the project manager (Department of Rail and Public Transportation, the Washington Metropolitan Area Transit Authority, or other project management agency) contact the Division of Natural Heritage (Christopher Ludwig, Natural Heritage Inventory Manager, telephone (804) 371-6206) to discuss arrangements for field survey work.
The Department of Conservation and Recreation has not surveyed any sites within the project area (see Draft EIS, pages 4-77 through 4-81, section 4.5.3), but recommends doing so before September ends if possible. The Draft EIS concludes that there is no suitable habitat for rare diabase plants (page 4-81); this conclusion should be re-evaluated during the appropriate season.

The Department of Agriculture and Consumer Services, which is responsible for protection of state-listed plant and insect species, indicates that it has nothing to add to the discussion of rare, threatened, and endangered species (Draft EIS, pages 4-76 through 4-81, section 4.5).

Under Title 29.1 of the Code of Virginia, the Department of Game and Inland Fisheries (DGIF) is the primary wildlife and freshwater fish management agency in the Commonwealth. DGIF has full law enforcement and regulatory jurisdiction over all wildlife resources, inclusive of state and federally endangered or threatened species, but excluding listed insects. The agency maintains a comprehensive system of databases of wildlife resources that is available through the Agency’s site at www.dgif.state.va.us, in the “Wildlife” section from the link to “Wildlife Information Online”. DGIF determines likely impacts on fish and wildlife resources and habitats, and recommends appropriate measures to avoid, reduce or compensate for those impacts. For more information on the Wildlife Information Online Service, the project manager may contact Kathy Quindlen at (804) 367-9717.

2. Solid and Hazardous Waste Management. DEQ’s Division of Waste Program coordination, Office of Remedial Programs (hereinafter “DEQ’s Waste Division”) did a cursory review of its data files and did not find any contamination sites that might affect, or be affected, by this project. The Draft EIS addressed hazardous and solid waste issues (pages 4-170 through 4-184, section 4.9).

The Draft EIS indicates that structures to be demolished have not been checked for the presence of asbestos-containing materials or for lead-based paint, but it indicates a commitment on the part of the project manager to follow applicable rules in these regards (page 4-184, section 4.9.5). See “Regulatory and Coordination Needs,” item 1, below for more information.

DEQ encourages the project manager to reduce solid waste at the source, re-use materials, and recycle wastes to the maximum extent practicable. The Draft EIS did not address pollution prevention, according to DEQ’s Waste Division; see item 11, below.

3. Air Quality. According to DEQ’s Division of Air Program Coordination (hereinafter “DEQ’s Air Division”), the project is in an ozone non-attainment area, which means that the project managers should take all precautions to limit the emissions of
volatile organic compounds (VOCs) and oxides of nitrogen (NOx). Detailed modeling studies have established that none of the alternatives under consideration will significantly affect air quality. It appears to us that any of the “build” alternatives would be preferable to the no-action alternative, given the widely acknowledged beneficial air quality impacts of improved mass transit, particularly in the Northern Virginia ozone non-attainment area.

An additional precaution in ozone non-attainment areas, stemming from 9 VAC 5-40-5490 in the Regulations for the Control and Abatement of Air Pollution, is that there are some limitations on the use of “cut-back” asphalt (liquefied asphalt cement, blended with petroleum solvents) that may apply in the construction of the roads or paths associated with the project. The asphalt must be “emulsified” (predominantly cement and water with a small amount of emulsifying agent) except when specified circumstances apply. Moreover, there are time-of-year restrictions on its use during the months of April through October in VOC emission control areas.

During construction activities, fugitive dust must be kept at a minimum by using control methods outlined in 9 VAC 5-50-60 et seq. of the Regulations. These precautions include, but are not limited to, the following:

- Use, where possible, of water or chemicals for dust control;
- Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials;
- Covering of open equipment for conveying materials; and
- Prompt removal of spilled or tracked dirt or other materials from paved streets and removal of dried sediments resulting from soil erosion.

In addition, if project activities include the burning of construction or demolition material, this activity must meet the requirements under 9 VAC 5-40-5600 et seq. of the Regulations for open burning, and a permit may be required. The Regulations provide for, but do not require, the local adoption of a model ordinance concerning open burning; we recommend that the project managers contact Fairfax and Loudoun County officials to determine what local requirements, if any, exist. Some applicable provisions of the model regulation include, but are not limited to:

- All reasonable effort shall be made to minimize the amount of material burned, with the number and size of the debris piles;
- The material to be burned shall consist of brush, stumps and similar debris waste and clean burning demolition material;
- The burning shall be at least 500 feet from any occupied building unless the occupants have given prior permission, other than a building located on the property on which the burning is conducted;
The burning shall be conducted at the greatest distance practicable from highways and air fields;
• The burning shall be attended at all times and conducted to ensure the best possible combustion with a minimum of smoke being produced;
• The burning shall not be allowed to smolder beyond the minimum period of time necessary for the destruction of the materials; and
• The burning shall be conducted only when the prevailing winds are away from any city, town or built-up area.

Heating units associated with new stations or other structures may require new source review permits or operating permits from DEQ. See “Regulatory and Coordination Needs,” item 2, below.

4. Historic Structures and Archaeological Resources. The Department of Historic Resources indicates that it is working with project management agencies and their consultant on the identification of historic properties in the proposed corridor. The agencies involved will sign a Programmatic Agreement with the Department of Historic Resources which outlines procedures for the identification and evaluation of historic properties and plans for mitigation of effects upon properties listed on or eligible for the National Register of Historic Places. We encourage the agencies involved to continue coordinating with the Department of Historic Resources as this project evolves.

5. Water and Wetlands. According to DEQ’s Division of Water Program Coordination, Office of Water Permits Support (hereinafter “DEQ’s Water Division”), any of the “build alternatives” would affect surface waters and wetlands. The limitation of proposed construction to the median of existing roads, as much as practicable, will be helpful in avoiding and minimizing wetland and waterway impacts of the project; we encourage additional efforts in this regard as the project progresses. Examples of avoidance and minimization efforts include completely spanning wetlands to avoid impacts, and shifting the alignment of road or rail structures. Unavoidable impacts to wetlands and streams may require compensatory mitigation, as the Draft EIS explains (pages 4-54 through 4-58, section 4.2.6).

In general, DEQ recommends that stream and wetland impacts be avoided to the maximum extent practicable. For unavoidable impacts, DEQ encourages the following practices to minimize the impacts to wetlands and waterways:

• Operate machinery and construction vehicles outside of stream-beds and wetlands; use synthetic mats when in-stream work is unavoidable;
• Erosion and sedimentation controls should be designed in accordance with the most current edition of the Virginia Erosion and Sediment Control Handbook.
These controls should be in place prior to clearing and grading, and maintained in good working order to minimize impacts to State waters. The controls should remain in place until the area is stabilized. (See item 6, below.)

- Place heavy equipment, located in temporarily impacted wetland areas, on mats, geotextile fabric, or use other suitable measures to minimize soil disturbance, to the maximum extent practicable.

- Restore all temporarily disturbed wetland areas to pre-construction conditions and plant or seed with appropriate wetlands vegetation in accordance with the cover type (emergent, scrub-shrub, or forested). The project managers should take all appropriate measures to promote re-vegetation of these areas. Stabilization and restoration efforts should occur immediately after the temporary disturbance of each wetland area instead of waiting until the entire project has been completed.

- Place all materials which are temporarily stockpiled in wetlands, designated for use for the immediate stabilization of wetlands, on mats or geotextile fabric in order to prevent entry into State waters. These materials should be managed in a manner that prevents leachates from entering state waters and must be entirely removed within thirty days following completion of that construction activity. The disturbed areas should be returned to their original contours, stabilized within thirty days following removal of the stockpile, and restored to the original vegetated state.

The project may require a Virginia Water Protection Permit, and it is likely to require a Virginia Pollutant Discharge Elimination System (VPDES) Stormwater permit. See “Regulatory and Coordination Needs, item 3, below.

6. Erosion and Sediment Control; Stormwater Management. Executive Order 12088, “Federal Compliance with Pollution Control Standards and the Sykes Act,” authorizes cooperation between state and federal agencies regarding the conservation of natural resources. Compliance with the state Erosion and Sediment Control and Stormwater Management programs through proper design and implementation is consistent with the mandate of these federal directives. Notwithstanding cooperation with the Department of Conservation and Recreation, federal agencies are responsible for ensuring compliance with the state program on regulated activities under their authority through separate agreements with contractors, training, field inspection, enforcement action, or other means that are consistent with agency policy and federal and state mandates.

7. Chesapeake Bay Preservation Act Compliance. Road and railway projects are conditionally exempt from the requirements of the Chesapeake Bay Preservation Area Designation and Management Regulations (9 VAC 10-20-10 et seq.) provided such
projects are constructed, operated, and maintained in accordance with the Virginia Erosion and Sediment Control Law and the Virginia Stormwater Management Act (or an equivalent local program). This conditional exemption also requires that road alignments and design prevent or otherwise minimize (i) encroachment in Resource Protection Areas, as defined in the Regulations, and (ii) adverse effects on water quality. Non-linear features of the project, such as parking lots and stations, are not exempt and must be consistent with the General Performance Criteria and the Development Criteria for Resource Protection Areas. (Both the General Performance Criteria and the Development Criteria are found in the Regulations.) During planning and design phases, site-specific surveys should be conducted to verify the presence or absence, and boundaries, of any Resource Protection Areas.

8. Recreation Resources. The Department of Conservation and Recreation has indicated that the proposed project will not affect any streams on the National Park Service Nationwide Inventory, Final List of Rivers, or existing or potential State Scenic Rivers. Nor will the project affect existing or potential State Scenic Byways.

9. Pesticides and Herbicides. If pesticides or herbicides must be used, their use should be strictly in accordance with manufacturers' recommendations. In addition, we recommend the use of the least toxic herbicides or pesticides effective for landscape maintenance. Products containing volatile organic compounds as their active ingredient should be avoided in order to protect air quality. For more information on this subject, please contact the Department of Agriculture and Consumer Services (telephone (804) 786-3501).

10. Forest and Tree Protection. According to the Department of Forestry, this project will not significantly affect forest lands of the Commonwealth.

In order to protect trees in project construction areas from the effects of this project, the trees should be marked and fenced at least to the dripline or the end of the root system, whichever extends farther from the tree stem. Marking should be done with highly visible ribbon so that equipment operators see the protected areas easily.

Parking and stacking of heavy equipment, construction materials, or soil stockpiles near trees can damage root systems by compacting the soil. Soil compaction, from weight or vibration, affects root growth, water and nutrient uptake, and gas exchange. If parking and stacking are unavoidable, temporary crossing bridges, or mats to minimize soil compaction and mechanical injury to plants, should be used. Soil stockpiles should be covered to prevent soil erosion and fugitive dust.

Questions on tree protection may be directed to the Department of Forestry (Mike Foreman, telephone (434) 977-6555).
11. Pollution Prevention. DEQ advocates that principles of pollution prevention be used in all construction projects as well as in facility operations. Effective siting, planning, and on-site Best Management Practices (BMPs) will help to ensure that environmental impacts are minimized. However, pollution prevention techniques also include decisions related to construction materials, design, and operational procedures that will facilitate the reduction of wastes at the source. We have several pollution prevention recommendations that may be helpful in constructing or operating this project:

- Consider development of an effective Environmental Management System (EMS). An effective EMS will ensure that the proposed facility is committed to minimizing its environmental impacts, setting environmental goals, and achieving improvements in its environmental performance. DEQ offers EMS development assistance and recognizes facilities with effective Environmental Management Systems through its Virginia Environmental Excellence Program.
- Consider environmental attributes when purchasing materials. For example, the extent of recycled material content, toxicity level, and amount of packaging should be considered and can be specified in purchasing contracts.
- Consider contractors’ commitments to the environment (such as an EMS) when choosing contractors. Specifications regarding raw materials and construction practices can be included in contract documents and requests for proposals.
- Choose sustainable materials and practices for infrastructure and building construction and design. These could include asphalt and concrete containing recycled materials, and integrated pest management in landscaping, among other things.
- Integrate pollution prevention techniques into facility maintenance and operation, to include the following: inventory control (record-keeping and centralized storage for hazardous materials), product substitution (use of non-toxic cleaners), and source reduction (fixing leaks, energy-efficient HVAC and equipment). Maintenance facilities should be designed with sufficient and suitable space to allow for effective inventory control and preventive maintenance.

DEQ’s Office of Pollution Prevention provides free information and technical assistance relating to pollution prevention techniques and EMS. If interested, the project manager may contact that Office (Tom Griffin, telephone (804) 698-4545).

12. Transportation Impacts. The Virginia Department of Transportation is of the opinion that any of the “build” alternatives described in the Draft EIS would be
preferable to the no-action alternative because of the beneficial impact of improved mass transit on congested areas in Northern Virginia, including Tysons Corner.

Regulatory and Coordination Needs

1. Solid and Hazardous Waste Management. Soil suspected of contamination, and wastes that are generated, must be tested and disposed of in accordance with applicable Federal, State, and local laws and regulations, including but not limited to the Virginia Waste Management Act (Virginia Code sections 10.1-1400 et seq.), the Virginia Hazardous Waste Management Regulations (9 VAC 20-60 et seq.), and the Virginia Solid Waste Management Regulations (9 VAC 20-80 et seq.). (See the attached comments from DEQ's Waste Division, Office of Remedial Programs.)

   According to DEQ's Northern Virginia Regional Office, the Draft EIS mentions the identification of 34 contamination sites that were not identified in the Environmental Database Search results. We recommend that these sites be discussed with that Office (Charlie Forbes, Regional Permits Manager, telephone (703) 583-3850).

   As mentioned above and in the Draft EIS, the structures to be demolished as part of this project have not yet been checked for the presence of asbestos-containing materials or lead-based paint. The following guidance pertains in the event either of these substances is found.

   (a) Asbestos Abatement. If asbestos-containing materials (ACM) are found, following their classification as friable or non-friable, all waste ACM shall be disposed of in accordance with the Virginia Solid Waste Management Regulations (9 VAC 20-80-640), and transported in accordance with the Virginia regulations governing Transportation of Hazardous Materials (9 VAC 20-110-10 et seq.). The project manager should contact the DEQ Waste Management Program (telephone (804) 698-4021) and the Department of Labor and Industry, Dr. Clarence Wheeling, telephone (804) 786-0574 for additional information.

   (b) Lead-Based Paint. The project must comply with the U.S. Department of Labor, Occupational Safety and Health Administration (OSHA) regulations, and with the Virginia Lead-Based Paint Activities Rules and Regulations. For additional information regarding these requirements, the project manager should contact the Department of Professional and Occupational Regulation (Thomas Perry, telephone (804) 367-8595).

2. Air Quality Regulation. As indicated above, heating units may require new source review or operating permits from DEQ. In addition, open burning activities may require an open burning permit. Questions on these matters, and inquiries about time-of-year restrictions on the use of cut-back asphalt, may be directed to DEQ's Northern
Virginia Regional Office (Terry Darton, Air Permits Manager, telephone (703) 583-3845).

3. Water Quality and Wetland Permitting. The Draft EIS addresses the need for obtaining Virginia Pollutant Discharge Elimination System (VPDES) Stormwater General Permits for construction activity that disturbs 5 or more acres of land (page 4-19, section 4.2.1). The project manager should be aware that the regulation on this subject is changing; sites that are between 1 and 5 acres will also be required to apply for coverage under this General Permit by March 10, 2003.

Stormwater management facilities are proposed along the route to handle storm flow from the system (Draft EIS, section 2, Figure 2.3-16). The project manager should work with DEQ to ensure that necessary VPDES permits are obtained for these facilities. If de-watering of the tunnels for the underground Metrorail stations is necessary, a VPDES permit might be necessary for discharges resulting from this activity.

Site-specific VPDES permits and/or VPDES Stormwater General Permits may also be needed for BRT stations and the Maintenance and Storage Facility contemplated under the BRT alternative.

Similarly, if the Metrorail alternative is selected, permits may be required for discharges from the Service and Inspection Yard. The Yard is to include a car wash and stormwater management facilities of its own. If flow from the car wash is discharged to the sanitary sewer, then an industrial user permit is likely to be required for the wastewater treatment plant accepting the flow.

The Draft EIS indicates that both VPDES and Virginia Water Protection Permits (VWPP) will be required for construction of the underground sections of the Metrorail, according to DEQ’s Northern Virginia Regional Office. However, VWPP permits will only be required if wetlands will be involved.

Questions on water permits may be addressed to DEQ’s Northern Virginia Regional Office (Charlie Forbes, Regional Permits Manager, telephone (703) 583-3850).

4. Erosion Control; Stormwater Management. Questions relating to compliance with the Virginia Erosion and Sediment Control Law and the Virginia Stormwater Management Law may be addressed to the Department of Conservation and Recreation’s Potomac Watershed Office (Mary Apostolico, telephone (540) 347-6420).

5. Subaqueous Bed Encroachment. Any encroachments in, on, or over state-owned subaqueous lands, along with the activities subject to water resource permitting identified in item 3 above, require the submission of a Joint Permit Application to the
Marine Resources Commission. The Commission acts as a clearinghouse for permit processing by itself, DEQ’s Regional Offices, and the Army Corps of Engineers. Questions on the process, and on the Commission’s permit jurisdiction, may be addressed to the Commission (Mark Eversole, telephone (757) 247-2200).

6. Federal Consistency under the Coastal Zone Management Act. Pursuant to the Coastal Zone Management Act of 1972, as amended, the lead federal agency is required to determine the consistency of its activities affecting Virginia’s coastal resources or coastal uses with the Virginia Coastal Resources Management Program (VCP) (see section 307(c)(1) of the Act and 15 CFR Part 930, sub-part C, section 930.34). This involves an analysis of the activities in light of the Enforceable Programs of the VCP (first enclosure), and submission of a consistency determination reflecting that analysis and committing the federal agency to comply with the Enforceable Programs. This determination may be provided as part of the documentation concluding the NEPA process, or independently, depending on your agency’s preference. Section 930.39 gives content requirements for the consistency determination. If you need clarification of these comments, please contact Charles Ellis at (804) 698-4488.

Thank you for the opportunity to review this Draft EIS. We look forward to reviewing the Final EIS for this project. Detailed comments of reviewing agencies are attached.

Sincerely,

Ellie L. Irons  
Program Manager  
Office of Environmental Impact Review

Enclosures
cc: (next page)
cc: Charles D. Forbes, DEQ-NVRO
    Thomas D. Modena, DEQ-Waste
    Thomas Wilcox, DGIF
    Derral Jones, DCR
    Keith R. Tignor, DACS
    Susan E. Douglas, VDH
    Kotur S. Narasimhan, DEQ-Air
    Martin G. Ferguson, Jr., DEQ-Water
    Mark Eversole, MRC
    Angel N. Deem, VDOT
    Lily A. Richards, DHR
    Gerald P. Wilkes, DMME
    Catherine M. Harold, CBLAD
    J. Michael Foreman, DOF
    David Bulova, NVRC
    James P. Zook, Fairfax County
    Kirby M. Bowers, Loudoun County
    John Dittmaier, WMATA
    Karl Rohrer, DPRT
Attachment 1

Enforceable Regulatory Programs comprising Virginia's Coastal Resources Management Program (VCP)

a. Fisheries Management - The program stresses the conservation and enhancement of finfish and shellfish resources and the promotion of commercial and recreational fisheries to maximize food production and recreational opportunities. This program is administered by the Marine Resources Commission (VMRC); Virginia Code §28.2-200 to §28.2-713 and the Department of Game and Inland Fisheries (DGIF); Virginia Code §29.1-100 to §29.1-570.

The State Tributyltin (TBT) Regulatory Program has been added to the Fisheries Management program. The General Assembly amended the Virginia Pesticide Use and Application Act as it related to the possession, sale, or use of marine antifoulant paints containing TBT. The use of TBT in boat paint constitutes a serious threat to important marine animal species. The TBT program monitors boating activities and boat painting activities to ensure compliance with TBT regulations promulgated pursuant to the amendment. The VMRC, DGIF, and Virginia Department of Agriculture Consumer Services (VDACS) share enforcement responsibilities; Virginia Code §3.1-249.59 to §3.1-249.62.

b. Subaqueous Lands Management - The management program for subaqueous lands establishes conditions for granting or denying permits to use state-owned bottomlands based on considerations of potential effects on marine and fisheries resources, tidal wetlands, adjacent or nearby properties, anticipated public and private benefits, and water quality standards established by the Department of Environmental Quality (DEQ). The program is administered by the Marine Resources Commission; Virginia Code §28.2-1200 to §28.2-1213.

c. Wetlands Management - The purpose of the wetlands management program is to preserve wetlands, prevent their despoliation, and accommodate economic development in a manner consistent with wetlands preservation.

(1) The tidal wetlands program is administered by the Marine Resources Commission; Virginia Code §28.2-1301 through §28.2-1320.

(2) The Virginia Water Protection Permit program administered by DEQ includes protection of wetlands --both tidal and non-tidal; Virginia Code §62.1-44.15:5 and Water Quality Certification pursuant to Section 401 of the Clean Water Act.
Attachment I continued

Page 2

d. **Dunes Management** - Dune protection is carried out pursuant to The Coastal Primary Sand Dune Protection Act and is intended to prevent destruction or alteration of primary dunes. This program is administered by the Marine Resources Commission; Virginia Code §28.2-1400 through §28.2-1420.

e. **Non-point Source Pollution Control** - (1) Virginia’s Erosion and Sediment Control Law requires soil-disturbing projects to be designed to reduce soil erosion and to decrease inputs of chemical nutrients and sediments to the Chesapeake Bay, its tributaries, and other rivers and waters of the Commonwealth. This program is administered by the Department of Conservation and Recreation; Virginia Code §10.1-560 et seq. (2) Coastal Lands Management is a state-local cooperative program administered by the Chesapeake Bay Local Assistance Department and 84 localities in Tidewater (see i) Virginia; Virginia Code §10.1-2100 -10.1-2114 and 9 VAC10-20 et seq.

f. **Point Source Pollution Control** - The point source program is administered by the State Water Control Board (DEQ) pursuant to Virginia Code §62.1-44.15. Point source pollution control is accomplished through the implementation of:

(1) the National Pollutant Discharge Elimination System (NPDES) permit program established pursuant to Section 402 of the federal Clean Water Act and administered in Virginia as the Virginia Pollutant Discharge Elimination System (VPDES) permit program.

(2) The Virginia Water Protection Permit (VWPP) program administered by DEQ; Virginia Code §62.1-44.15:5 and Water Quality Certification pursuant to Section 401 of the Clean Water Act.

g. **Shoreline Sanitation** - The purpose of this program is to regulate the installation of septic tanks, set standards concerning soil types suitable for septic tanks, and specify minimum distances that tanks must be placed away from streams, rivers, and other waters of the Commonwealth. This program is administered by the Department of Health (Virginia Code §32.1-164 through §32.1-165).

h. **Air Pollution Control** - The program implements the federal Clean Air Act to provide a legally enforceable State Implementation Plan for the attainment and maintenance of the National Ambient Air Quality Standards. This program is administered by the State Air Pollution Control Board (Virginia Code §10.1-1300 through §10.1-1320).

(i) **Coastal Lands Management** is a state-local cooperative program administered by the Chesapeake Bay Local Assistance Department and 84 localities in Tidewater, Virginia established pursuant to the Chesapeake Bay Preservation Act; Virginia Code §10.1-2100 -10.1-2114 and Chesapeake Bay Preservation Area Designation and Management Regulations; Virginia Administrative Code 9 VAC10-20 et seq.
Attachment 2

Advisory Policies for Geographic Areas of Particular Concern

a. Coastal Natural Resource Areas - These areas are vital to estuarine and marine ecosystems and/or are of great importance to areas immediately inland of the shoreline. Such areas receive special attention from the Commonwealth because of their conservation, recreational, ecological, and aesthetic values. These areas are worthy of special consideration in any planning or resources management process and include the following resources:

a) Wetlands
b) Aquatic Spawning, Nursery, and Feeding Grounds
c) Coastal Primary Sand Dunes
d) Barrier Islands
e) Significant Wildlife Habitat Areas
f) Public Recreation Areas
g) Sand and Gravel Resources
h) Underwater Historic Sites.

b. Coastal Natural Hazard Areas - This policy covers areas vulnerable to continuing and severe erosion and areas susceptible to potential damage from wind, tidal, and storm related events including flooding. New buildings and other structures should be designed and sited to minimize the potential for property damage due to storms or shoreline erosion. The areas of concern are as follows:

i) Highly Erodible Areas
ii) Coastal High Hazard Areas, including flood plains.

c. Waterfront Development Areas - These areas are vital to the Commonwealth because of the limited number of areas suitable for waterfront activities. The areas of concern are as follows:

i) Commercial Ports
ii) Commercial Fishing Piers
iii) Community Waterfronts

Although the management of such areas is the responsibility of local government and some regional authorities, designation of these areas as Waterfront Development Areas of Particular Concern (APC) under the VCRMP is encouraged. Designation will allow the use of federal CZMA funds to be used to assist planning for such areas and the implementation of such plans. The VCRMP recognizes two broad classes of priority uses for waterfront development APC:
Attachment 2 con’t

i) water access dependent activities;
ii) activities significantly enhanced by the waterfront location and complementary to other existing and/or planned activities in a given waterfront area.

Advisory Policies for Shorefront Access Planning and Protection

a. **Virginia Public Beaches** - Approximately 25 miles of public beaches are located in the cities, counties, and towns of Virginia exclusive of public beaches on state and federal land. These public shoreline areas will be maintained to allow public access to recreational resources.

b. **Virginia Outdoors Plan** - Planning for coastal access is provided by the Department of Conservation and Recreation in cooperation with other state and local government agencies. The Virginia Outdoors Plan (VOP), which is published by the Department, identifies recreational facilities in the Commonwealth that provide recreational access. The VOP also serves to identify future needs of the Commonwealth in relation to the provision of recreational opportunities and shoreline access. Prior to initiating any project, consideration should be given to the proximity of the project site to recreational resources identified in the VOP.

c. **Parks, Natural Areas, and Wildlife Management Areas** - Parks, Wildlife Management Areas, and Natural Areas are provided for the recreational pleasure of the citizens of the Commonwealth and the nation by local, state, and federal agencies. The recreational values of these areas should be protected and maintained.

d. **Waterfront Recreational Land Acquisition** - It is the policy of the Commonwealth to protect areas, properties, lands, or any estate or interest therein, of scenic beauty, recreational utility, historical interest, or unusual features which may be acquired, preserved, and maintained for the citizens of the Commonwealth.

e. **Waterfront Recreational Facilities** - This policy applies to the provision of boat ramps, public landings, and bridges which provide water access to the citizens of the Commonwealth. These facilities shall be designed, constructed, and maintained to provide points of water access when and where practicable.

f. **Waterfront Historic Properties** - The Commonwealth has a long history of settlement and development, and much of that history has involved both shorelines and near-shore areas. The protection and preservation of historic shorefront properties is primarily the responsibility of the Department of Historic Resources. Buildings, structures, and sites of historical, architectural, and/or archaeological interest are significant resources for the citizens of the Commonwealth. It is the policy of the
If you cannot meet the deadline, please notify CHARLIE ELLIS at 804/698-4488 prior to the date given. Arrangements will be made to extend the date for your review if possible. An agency will not be considered to have reviewed a document if no comments are received (or contact is made) within the period specified.

REVIEW INSTRUCTIONS:

A. Please review the document carefully. If the proposal has been reviewed earlier (i.e. if the document is a federal Final EIS or a state supplement), please consider whether your earlier comments have been adequately addressed.

B. Prepare your agency's comments in a form which would be acceptable for responding directly to a project proponent agency.

C. Use your agency stationery or the space below for your comments. IF YOU USE THE SPACE BELOW, THE FORM MUST BE SIGNED AND DATED.

Please return your comments to:

MR. CHARLES H. ELLIS III  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
OFFICE OF ENVIRONMENTAL IMPACT REVIEW  
629 EAST MAIN STREET, SIXTH FLOOR  
RICHMOND, VA 23219  
FAX #804/698-4319

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AUG 08 2002

Charles H. Ellis III  
Environmental Program Planner

COMMENTS

Statements in the project document concerning endangered species were reviewed and compared to available information. No additional comments are necessary in reference to endangered plant and insect species regarding this project.

(signed) (Keith R. Tignor) (date) August 5, 2002

(title) Endangered Species Coordinator

(agency) VDACS, Office of Plant and Pest Service

PROJECT # 02-124F  8/98
DATE: 1 August 2002

TO: Charles H. Ellis, III, Virginia Department of Environmental Quality

FROM: Derral Jones, Planning Bureau Manager

SUBJECT: Draft Environmental Impact Statement and Section 4(f) evaluation for the Dulles Rapid Transit Corridor

In January 2002, the Department of Conservation and Recreation (DCR) submitted comments on this project to the Washington Metropolitan Area Transit Authority. To reiterate those comments for your use: The Department of Conservation and Recreation's Division of Natural Heritage (DCR) has searched its Biological and Conservation Data System (BCD) 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 species, unique or exemplary natural communities, and significant geologic formations.

According to the information currently in our files, several rare plants, which are typically associated with prairie vegetation and inhabit semi-open diabase glades in Virginia, may occur at this location if suitable habitat is present. Diabase glades are characterized by historically fire-dominated grassland vegetation on relatively nutrient-rich soils underlain by Triassic bedrock. Diabase flatrock, a hard, dark-colored volcanic rock, is found primarily in northern Virginia counties and is located within the geologic formation known as the Triassic Basin. Where the bedrock is exposed, a distinctive community type of drought-tolerant plants occurs. Diabase flatrocks are extremely rare natural communities that are threatened by activities such as quarrying and road construction (Rawinski, 1995).

In Northern Virginia, diabase supports occurrences of several global and state rare plant species: earleaf foxglove (Agalinis auriculata, G2/S1/SOC/NS), white heath aster (Aster ericoides, G5/S2/NF/NS), blue-hearts (Buchnera americana, G3G4/S1/NF/NS), hairy beardtongue (Penstemon hirundus, G4/S2/NF/NS), downy phlox (Phlox pilosa, GST5/S2/NF/NS), stiff goldenrod (Oligoneuron rigidum var. rigidum, G5/S2/NF/NS), and marsh hedgenettle (Satureja pilosa var. arnicola).

An Agency of the Natural Resources Secretariat
G5/S1/NF/NS. Please note that earleaf foxglove is currently tracked as a species of concern by the United States Fish and Wildlife Service (USFWS); however this designation has no official legal status.

Due to the potential for this site to support populations of natural heritage resources, DCR recommends an inventory of suitable habitat in the study area. 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 J. Christopher Ludwig, Natural Heritage Inventory Manager, at (804) 371-6206 to discuss arrangements for field work. A list of other individuals who are qualified to conduct inventories may be obtained from the USFWS.

Any absence of data may indicate that the project area has not been surveyed, rather than confirm that the area lacks other natural heritage resources. DCR’s Biological and Conservation Data System is continuously revised. Please contact DCR for an update on this natural heritage information if a significant amount of time passes before it is utilized.”

The Draft Environmental Impact Statement, discusses some of these issues in 4.5.3: Existing Conditions, pp. 4-77 thru 4-81, and states on page 81, the indication of the “absence of suitable habitat for rare diabase plants". That should be re-evaluated with a survey during the appropriate season. DCR has not surveyed any sites within the project area, but recommends doing so either this month or during September, if possible. As stated above, DCR-Division of Natural Heritage biologists are qualified and available to conduct inventories for rare, threatened, and endangered species. Please contact J. Christopher Ludwig, Natural Heritage Inventory Manager, at (804) 371-6206 to discuss arrangements for field work.

Lastly, the proposed project is not anticipated to have any adverse impacts on existing or planned recreational facilities. Nor will it impact any streams on the National Park Service Nationwide Inventory, Final List of Rivers, potential Scenic Rivers or existing or potential State Scenic Byways. Please contact DCR for an update on this information if a significant amount of time passes before it is utilized.

Thank you for the opportunity to offer comments on this project.

Literature Cited


Definition of Abbreviations Used on Natural Heritage Resource Lists
of the Virginia Department of Conservation and Recreation

Natural Heritage Ranks
The following ranks are used by the Virginia Department of Conservation and Recreation to set protection priorities for natural heritage resources. Natural Heritage Resources, or "NHRs," are rare plant and animal species, rare and exemplary natural communities, and significant geologic features. The primary criterion for ranking NHRs is the number of populations or occurrences, i.e., the number of known distinct localities. Also of great importance is the number of individuals in existence at each locality or, if a highly mobile organism (e.g., sea turtle), many birds, and butterflies), the total number of individuals. Other considerations may include the quality of the occurrences, the number of
protected occurrences, and threats. However, the emphasis remains on the number of populations or occurrences such that ranks will be an index of known biological rarity.

**Ranks**

**S1** Extremely rare; usually 5 or fewer populations or occurrences in the state; or may be a few remaining individuals; often especially vulnerable to extinction.

**S2** Very rare; usually between 5 and 20 populations or occurrences; or with many individuals in fewer occurrences; often susceptible to becoming extirpated.

**S3** Rare to uncommon; usually between 20 and 100 populations or occurrences; may have fewer occurrences, but with a large number of individuals in some populations; may be susceptible to large-scale disturbances.

**S4** Common; usually >100 populations or occurrences, but may be fewer with many large populations; may be restricted to only a portion of the state; usually not susceptible to immediate threats.

**S5** Very common; demonstrably secure under present conditions.

**SA** Accidental in the state.

**S6B** Breeding status of an organism within the state.

**SH** Historically known from the state, but not verified for an extended period, usually >15 years; this rank is used primarily when inventory has been attempted recently.

**S6N** Non-breeding status within the state. Usually applied to winter resident species.

**SU** Status uncertain, often because of low search effort or cryptic nature of the element.

**SX** Apparently extirpated from the state.

**SZ** Long distance migrant whose occurrences during migration are too irregular, transient and/or dispersed to be reliably identified, mapped and protected.

Global ranks are similar, but refer to a species' rarity throughout its total range. Global ranks are denoted with a "G" followed by a character. Note that G_A and G_N are not used and G_X means apparently extinct. A "Q" in a rank indicates that a taxonomic question concerning that species exists. Ranks for subspecies are denoted with a "T". The global and state ranks combined (e.g. G_A/SI) give an instant grasp of a species' known rarity.

These ranks should not be interpreted as legal designations.

**Federal Legal Status**

The Division of Natural Heritage uses the standard abbreviations for Federal endangemnt developed by the U.S. Fish and Wildlife Service, Division of Endangered Species and Habitat Conservation.

**Listed Endangered** - threatened with extinction throughout all or a significant portion of its range.

**Listed Threatened** - likely to become endangered in the foreseeable future.

**Proposed Endangered**

**Proposed Threatened**

**Candidate** - enough information is available to propose for listing, but listing is precluded by other pending proposals of higher priority.

**Species of Concern** -- species that merit special concern (not a regulatory category).

**No Federal Legal Status**

**State Legal Status**

The Division of Natural Heritage uses similar abbreviations for State endangerment.

**Listed Endangered**

**Listed Threatened**

**Proposed Endangered**

**Proposed Threatened**

**Candidate**

**Special Concern** -- animals that merit special concern according to VDGIF (not a regulatory category).

**No State Legal Status**

**Conservation Site Ranks**

A rank is a rating of the significance of the conservation site based on presence and number of natural heritage resources; on a scale of 1-5, 1 being most significant.

**B1** - Outstanding significance

**B2** - Very high significance

**B3** - High significance

**B4** - Moderate significance

**B5** - Of General Biodiversity significance

Site names ending in "Habitat Zone" are B5 sites on private lands.

For information on the laws pertaining to threatened or endangered species, contact U.S. Fish and Wildlife Service for all FEDERALLY listed species, Department of Agriculture and Consumer Services Plant Protection Bureau for STATE listed plants and insects; Department of Game and Inland Fisheries for all other STATE listed animals.
If you cannot meet the deadline, please notify CHARLIE ELLIS at 804/698-4488 prior to the date given. Arrangements will be made to extend the date for your review if possible. An agency will not be considered to have reviewed a document if no comments are received (or contact is made) within the period specified.

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B. Prepare your agency's comments in a form which would be acceptable for responding directly to a project proponent agency.

C. Use your agency stationery or the space below for your comments. IF YOU USE THE SPACE BELOW, THE FORM MUST BE SIGNED AND DATED.

Please return your comments to:

MR. CHARLES H. ELLIS III
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL IMPACT REVIEW
629 EAST MAIN STREET, SIXTH FLOOR
RICHMOND, VA 23219
FAX #804/698-4319

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JUL 15 2002

DEQ Office of Environmental Impact Review

Charles H. Ellis III
Environmental Program Planner

COMMENTS

The Virginia Dept. of Health has no objection to the proposed project.

(signed)        (date) 7-11-02
(Author)        (Title) Field Services Engineer (acting)
(agency)        Virginia Dept. of Health

PROJECT # 02-124P
MEMORANDUM

TO: Charles Ellis

FROM: Thomas Modena

DATE: July 29, 2002

COPIES: Kevin Greene

SUBJECT: Draft Environmental Impact Statement
Dulles Corridor Rapid Transit Project

The Office of Remedial Programs has reviewed the Federal Transit Administration's Dulles Corridor Rapid Transit Project Draft Environmental Impact Statement. We have the following comments concerning the waste issues associated with this project.

Hazardous and solid waste issues and sites were addressed in the report. The central office of the Waste Division did a cursory review of its data files and did not find any additional sites that might impact this project.

Since this project may involve construction, any soil 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 20-80); 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 Parts 107, 171.1-172.558.

The report states that structures to be demolished not have been checked for the presence of asbestos-containing materials (ACM) or lead-based paint (LBP). They should be
checked and if LBP or ACM are found, in addition to the Federal waste-related regulations, State regulations 9VAC 20-80-640 for ACM and 9VAC 20-60-261 for LBP must be followed.

Finally, pollution prevention was not addressed in the report. VDEQ encourages all construction projects and facilities to implement pollution prevention principles, including the reduction, reuse, and recycling of all solid wastes generated.

If you have any questions or need further information, please let me know.
DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF AIR PROGRAM COORDINATION

ENVIRONMENTAL REVIEW REPORT APPLICABLE TO AIR QUALITY

TO: Charles h. Ellis III
DEQ-OEIA PROJECT NUMBER: 02-124F

PROJECT TYPE: □ STATE EA/EIR/SONSI □ FEDERAL EA/EIS □ SCC
□ CONSISTENCY DETERMINATION/CERTIFICATION

PROJECT TITLE: DULLES CORRIDOR RAPID TRANSIT PROJECT

PROJECT SPONSOR: USDOT/FEDERAL TRANSIT AUTHORITY/VA DEPT. OF RAIL &
PUBLIC TRANSPORTATION/WASHINGTON METROPOLITAN AREA
TRANSIT AUTHORITY/FEDERAL AVIATION ADMINISTRATION

PROJECT LOCATION: X OZONE NON-ATTAINMENT AREA
□ OZONE MAINTENANCE AREA
□ STATE VOLATILE ORGANIC COMPOUNDS & NITROGEN
OXIDES EMISSION CONTROL AREA

REGULATORY REQUIREMENTS MAY BE APPLICABLE TO: X CONSTRUCTION
X OPERATION

STATE AIR POLLUTION CONTROL BOARD REGULATIONS THAT MAY APPLY:
1. □ 9 VAC 5-40-5200 C & 9 VAC 5-40-5220 E – STAGE I
2. □ 9 VAC 5-40-5200 C & 9 VAC 5-40-5220 F – STAGE II Vapor Recovery
3. □ 9 VAC 5-40-5490 et seq. – Asphalt Paving operations
4. □ 9 VAC 5-40-5600 et seq. – Open Burning
5. □ 9 VAC 5-50-60 et seq. Fugitive Dust Emissions
6. □ 9 VAC 5-50-130 et seq. - Odorous Emissions; Applicable to
7. □ 9 VAC 5-50-160 et seq. – Standards of Performance for Toxic Pollutants
8. □ 9 VAC 5-50-400 Subpart____, Standards of Performance for New Stationary Sources,
designates standards of performance for the
9. □ 9 VAC 5-80-10 et seq. of the regulations – Permits for Stationary Sources
10. □ 9 VAC 5-80-1700 et seq. Of the regulations – Major or Modified Sources located in
PSD areas. This rule may be applicable to the
11. □ 9 VAC 5-80-2000 et seq. of the regulations – New and modified sources located in
non-attainment areas
12. □ 9 VAC 5-80-800 et seq. Of the regulations – Operating Permits and exemptions. This
rule may be applicable to

COMMENTS SPECIFIC TO THE PROJECT:
Results of detailed modeling studies have established that operation of any
alternative considered has no significant effect on air quality. The project
being in an ozone non-attainment area, all precautions are to be taken
during the construction phase to restrict the emissions of volatile organic
compounds (VOC) and oxides of nitrogen (NOx).

Kotur S. Narasimhan
Office of Air Data Analysis

August 5, 2002
Review Instructions:
A. Please review the document carefully. If the proposal has been reviewed earlier (i.e. if the document is a federal Final EIS or a state supplement), please consider whether your earlier comments have been adequately addressed.
B. Prepare your agency’s comments in a form which would be acceptable for responding directly to a project proponent agency.
C. Use your agency stationery or the space below for you comments. If you use the space below, the form must be signed and dated.

Please return your comments to:

Mr. Charles H. Ellis, III
Dept. of Environmental Quality
Office of Environmental Impact Review
629 East Main Street, Sixth Floor
Richmond, VA 23219
Fax: (804) 698-4319

RECEIVED
JUL 19 2002
DEQ-Office of Environmental Impact Review

Charles H. Ellis, III
Environmental Program Planner

Comments:
VWPP – The Department of Environmental Quality (DEQ) Virginia Water Protection Permit Program has reviewed the DEIS for the Dulles Corridor Rapid Transit Project. We recognize the importance of this project. The scope of work includes the extension of mass transit service through the Dulles corridor. Thank you for the thorough report on potential impacts to state waters and for addressing efforts and requirements to avoid, minimize and compensate for the impacts.

The DEIS indicates all Build Alternatives will impact state waters, including wetlands. All attempts should be made to select the most feasible alternative that also avoids and minimizes potential direct and indirect impacts to wetlands and streams to the greatest extent practicable. We understand that impacts have been avoided and minimized by limiting proposed construction to the median of existing roadways as much as practicable. As the project progresses, please continue to investigate ways for additional avoidance and minimization of direct and indirect impacts to wetlands and streams to the greatest extent practicable. Examples of avoidance and minimization efforts include completely spanning wetlands to avoid impact and shifting the alignment to avoid or minimize wetland impacts. The selected alternative’s unavoidable impacts to wetlands and streams will require full compensatory mitigation as explained in the DEIS.

This project may require a Virginia Water Protection Permit, which includes coordination of this project with the Virginia Marine Resources Commission, the Army Corps of Engineers and the DEQ through the Joint Permit Application process.
Appropriate design and construction measures should be employed to avoid and minimize impacts to state waters during construction. All applicable best management practices should be used to minimize potential impacts. Machinery should be kept out of waterway and wetlands when possible. Machinery that must be operated within wetland areas should be maintained on mats in order to prevent tire rutting. In general, DEQ encourages the use of erosion and sediment control measures, adherence to storm water management regulations, and careful construction practices to minimize temporary impacts to state waters during site construction activities.

VPDES/VPA: VPDES Storm water permits for construction activity will be necessary.

Name: Martin Ferguson
Signature: [Signature]
Date: July 19, 2002
Title: 
Agency: DEQ - Water Permits Support
Project: 02-124F
If you cannot meet the deadline, please notify CHARLIE ELLIS at 804/698-4488 prior to the date given. Arrangements will be made to extend the date for your review if possible. An agency will not be considered to have reviewed a document if no comments are received (or contact is made) within the period specified.

REVIEW INSTRUCTIONS:

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C. Use your agency stationery or the space below for your comments. **IF YOU USE THE SPACE BELOW, THE FORM MUST BE SIGNED AND DATED.**

Please return your comments to:

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DEPARTMENT OF ENVIRONMENTAL QUALITY  
OFFICE OF ENVIRONMENTAL IMPACT REVIEW  
629 EAST MAIN STREET, SIXTH FLOOR  
RICHMOND, VA 23219  
FAX #804/698-4319

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AUG 09 2002

DEQ Office of Environmental Impact Review

COMMENTS

See attached E-mail

(signed)  
(date) 8/5/02  
(title) KM - NVRO  
(agency) DEQ

PROJECT # 02-124F  

8/98
The purpose of this EM is to provide NRO review comments.

1) The Draft EIS addresses the need for obtaining Virginia Pollutant Discharge Elimination System (VPDES) construction permits for construction activity that disturbs five or more acres of land (Section 4.2). The Development Authority should be aware that the regulation is changing for the permitting of construction activities to include all sites that are between one and five acres of land. This regulation requires all construction sites that are one acre or more to apply for coverage by March 10, 2003.

2) Stormwater Management Facilities (Section 2, Figure 2.3-16) are proposed along the route to handle storm flow from the system. The Development Authority should coordinate with DEQ as the project progresses to ensure that all necessary VPDES permits are obtained for the stormwater management facilities. If dewatering of the tunnels for the underground Metrorail stations is necessary, then a VPDES permit could be necessary for any discharges from this activity.

3) If the BRT alternative is selected, then the Development Authority should coordinate with DBQ to obtain any necessary general stormwater or site specific VPDES permits for the BRT stations and for the BRT Maintenance & Storage Facility.

4) The Draft EIS describes a Metrorail Service and Inspection Yard that will be needed if the Metrorail alternative is selected. This yard will include a car wash and stormwater management facilities. If this option is selected, then there will need to be coordination with DEQ to ensure that any necessary permits are obtained for the discharges from the Yard. If flow from the car wash is discharged to the sanitary sewer, then an industrial user permit will most likely be necessary with the wastewater treatment plant accepting the flow.

5) NRO is unable to assess whether the cost of obtaining and maintaining environmental permits is addressed in the Operations & Maintenance costs estimates. Permit application fees were raised as of July 1, 2002. Similarly, it is unclear if the possibility of paying for the cost of permit-driven sampling and analysis has been considered in estimates. Most VPDES permits require flow estimates and analysis for a variety of parameters, based on the activities conducted at a site and the reasonable potential for the discharge of pollutants.

6) The Draft EIS states that both VPDES and Virginia Water Protection Permits (VWPP) will be obtained for construction of the underground sections of the Metrorail. VWPP permits will only be required if wetlands will be involved.

7) Section 4.9 discusses field reconnaissance done in the study area and the identification of thirty-four (34) sites that were not identified in the Environmental Database Search results. Will these sites be discussed with DEQ?

In general, the document states in numerous sections that all necessary environmental permits will be obtained, which satisfies the thrust of NRO concerns. However, close coordination with the various federal, state, and local authorities will be key to ensuring that a project of this magnitude is completed with minimal environmental damage.

A copy of this EM and the requisite OEIR paperwork will follow shortly.

Regards

CDF
DATE: July 3, 2002

PROJECT NUMBER (STATE/FEDERAL): 93-1245

PROJECT TITLE: Dulles Corridor Rapid Transit Project

PROJECT SPONSOR: USDOT/Federal Transit Authority/Va Dept. of Rail & Public
Transportation/Washington Metropolitan Area Transit Authority/Federal Aviation Administration

TYPE OF DOCUMENT: _____ Environmental Impact Report (State)
_____ Environmental Assessment (Federal)
X _____ Environmental Impact Statement (Federal)
_____ Draft _____ Final _____ Supplemental
_____ Consistency Determination/Certification

ROUTING OF DOCUMENT: Enclosed
** Sent directly to you by sponsoring agency. Please call the agency’s project contact (see attachment) if you have not received the document.

NOTES: 

DOCUMENT REFERRED FOR COMMENT TO:

** Department of Game & Inland Fisheries
** Department of Agriculture & Consumer Services
** Department of Conservation & Recreation
** Department of Health
** DEQ-Tech. Asst/Waste
** DEQ-Air Data Analysis
** DEQ-Water Protection Program
** DEQ-Regional Office Northern
** Department of Transportation
** Marine Resources Commission

** Department of Historic Resources
** Department of Mines, Minerals, & Energy
Virginia Institute of Marine Science
** Department of Forestry
** Chesapeake Bay Local Asst
** Planning District Commission: Northern Va.
** Locality: Fairfax County
** Loudoun County
** Others: Va. Economic Development Partnership

DEADLINE FOR COMMENTS: AUGUST 6, 2002
If you cannot meet the deadline, please notify Charles Ellis III at 804/698-4488 prior to the date given. Arrangements will be made to extend the date for your review if possible. An agency will not be considered to have reviewed a document if no comments are received (or contact is made) within the period specified.

REVIEW INSTRUCTIONS:

A. Please review the document carefully. If the proposal has been reviewed earlier (i.e. if the document is a federal Final EIS or a state supplement), please consider whether your earlier comments have been adequately addressed.

B. Prepare your agency's comments in a form which would be acceptable for responding directly to a project proponent agency.

C. Use your agency stationery or the space below for your comments. **IF YOU USE THE SPACE BELOW, THE FORM MUST BE SIGNED AND DATED.**

Please return your comments to:

MR. CHARLES H. ELLIS III  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
OFFICE OF ENVIRONMENTAL IMPACT REVIEW  
629 EAST MAIN STREET, SIXTH FLOOR  
RICHMOND, VA 23219  
FAX #804/698-4319  

[Signature]
Charles H. Ellis III  
Environmental Program Planner  

COMMENTS

No comment. (Our partner agency - VDOT participated in the document's preparation.)

(signed)  
Angel Deyo  
(date) 7/11/02  
(title) Envtl. Commntrt Coordinator

(agency) VDOT

PROJECT # 02-124F  
8/98
If you cannot meet the deadline, please notify CHARLIE ELLIS at 804/698-4486 prior to the date given. Arrangements will be made to extend the date for your review if possible. An agency will not be considered to have reviewed a document if no comments are received (or contact is made) within the period specified.

REVIEW INSTRUCTIONS:

A. Please review the document carefully. If the proposal has been reviewed earlier (i.e. if the document is a federal Final EIS or a state supplement), please consider whether your earlier comments have been adequately addressed.

B. Prepare your agency's comments in a form which would be acceptable for responding directly to a project proponent agency.

C. Use your agency stationery or the space below for your comments. IF YOU USE THE SPACE BELOW, THE FORM MUST BE SIGNED AND DATED.

Please return your comments to:

MR. CHARLES H. ELLIS III
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL IMPACT REVIEW
629 EAST MAIN STREET, SIXTH FLOOR
RICHMOND, VA 23219
FAX #804/698-4319

JUL 19 2002

DEQ Office of Environmental Impact Review

All work to be performed in waters and tidal wetlands within the Commonwealth of Virginia requires the submission of a Joint Permit Application (JPA) to the Virginia Marine Resources Commission (VMRC). VMRC would then act as the clearing house, distributing copies of the application to state, local and federal agencies for review and comments.

The review and permitting process normally requires a minimum of 90 days, so it is advised to contact this agency early in the planning phase, to allow ample time for public notice and permitting.

Copies of the JPA are available on the internet, or by contacting this office.

(signed) [Handwritten] (date) 7-18-02

(title) Environmental Engineer

(agency) Virginia Marine Resources Commission

PROJECT # 02-124F
July 16, 2002

Mr. Charles Ellis
Department of Environmental Quality
Office of Environmental Impact Review
629 East Main Street, Sixth Floor
Richmond, Virginia 23219

Re: Dulles Corridor Rapid Transit Project
DEQ Project Number 02-124F
DHR File Numbers 2000-1061

Dear Mr. Ellis:

Thank you for requesting our comments on the Dulles Corridor Rapid Transit Project. We are currently working with the FTA, USDOT, VDRTF, WMATA, the FAA, and their consultant, Parsons Engineering Science, Inc., on the identification of historic properties within the proposed transportation corridor. Currently, Parsons is drafting a Programmatic Agreement among the federal and state agencies and our department. This programmatic will outline the procedures to be followed in the identification and evaluation of historic properties as well as plan for the mitigation of effects to properties eligible for listing on the National Register of Historic Places. We encourage the federal and state agencies involved to continue coordinating with our office as the project evolves.

Thank you again for the opportunity to review and comment. If you have any questions or if we can be of any further assistance do not hesitate to contact me at (804) 367-2323 ext. 140 or lrichards@dhr.state.va.us.

Sincerely,

[Signature]

Lily A. Richards
Archaeologist and Historian
If you cannot meet the deadline, please notify CHARLIE ELLIS at 804/698-4488 prior to the date given. Arrangements will be made to extend the date for your review if possible. An agency will not be considered to have reviewed a document if no comments are received (or contact is made) within the period specified.

REVIEW INSTRUCTIONS:

A. Please review the document carefully. If the proposal has been reviewed earlier (i.e. if the document is a federal Final EIS or a state supplement), please consider whether your earlier comments have been adequately addressed.

B. Prepare your agency's comments in a form which would be acceptable for responding directly to a project proponent agency.

C. Use your agency stationery or the space below for your comments. IF YOU USE THE SPACE BELOW, THE FORM MUST BE SIGNED AND DATED.

Please return your comments to:

MR. CHARLES H. ELLIS III
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL IMPACT REVIEW
629 EAST MAIN STREET, SIXTH FLOOR
RICHMOND, VA 23219
FAX #804/698-4319

RECEIVED

JUL 17 2002

Charles H. Ellis III
Environmental Program Planner

COMMENTS

= NO COMMENTS =

(signed) /s/ Gerald F. Wilson
(date) 7/17/02
(title) GEOLOGIST SENIOR
_agency_ DMME/DMR

PROJECT #_02-124F_ 8/98
COMMONWEALTH of VIRGINIA
CHESAPEAKE BAY LOCAL ASSISTANCE DEPARTMENT

W. Taylor Murphy, Jr.
Secretary of Natural Resources

James Monroe Building
101 North 14th Street, 17th Floor
Richmond, Virginia 23219
FAX: (804) 225-3447
July 31, 2002

C. Scott Crafton
Acting Executive Director
(804) 225-3440
1-800-243-7229 Voice/TDD

Mr. Charles H. Ellis, III
DEQ Office of Environmental Impact Review
629 East Main Street, Sixth Floor
Richmond, VA 23219

RE: Dulles Corridor Rapid Transit Project
CBLAD Project Review No.: SSPR-VDOT-05-02

Dear Mr. Ellis:

As you requested, we have reviewed the Draft Environmental Impact Statement for the proposed Dulles Corridor Rapid Transit Project. During the siting and design phases of the project the following should be taken into consideration. Roadway and railroad projects are conditionally exempt from the requirements of the Chesapeake Bay Preservation Area Designation and Management Regulations (Regulations) provided they are constructed, operated and maintained in accordance with the Erosion and Sediment Control Law and the Virginia Stormwater Management Act (or equivalent local program). This conditional exemption also requires that roadway alignments and design be optimized to prevent or otherwise minimize (i) encroachment in the Resource Protection Area and (ii) adverse effects on water quality. Nonlinear features of the project, such as parking lots and stations, are not exempt and are required to be consistent with the General Performance Criteria and the Development Criteria for Resource Protection Areas of the Regulations. During the planning and design phases, site-specific surveys should be conducted to verify the presence/absence and boundaries of any Resource Protection Areas.

We appreciate the opportunity to provide our comments on this project. Please do not hesitate to contact us at 1-800-CHESBAY should you have any questions.

Sincerely,

Catherine M. Harold
Environmental Engineer

Shawn E. Smith
Principal Environmental Planner

Cc: Martha H. Little, CBLAD
Scott Crafton, CBLAD
If you cannot meet the deadline, please notify CHARLIE ELLIS at 804/698-4488 prior to the date given. Arrangements will be made to extend the date for your review if possible. An agency will not be considered to have reviewed a document if no comments are received (or contact is made) within the period specified.

REVIEW INSTRUCTIONS:

A. Please review the document carefully. If the proposal has been reviewed earlier (i.e. if the document is a federal Final EIS or a state supplement), please consider whether your earlier comments have been adequately addressed.

B. Prepare your agency's comments in a form which would be acceptable for responding directly to a project proponent agency.

C. Use your agency stationery or the space below for your comments. IF YOU USE THE SPACE BELOW, THE FORM MUST BE SIGNED AND DATED.

Please return your comments to:

MR. CHARLES H. ELLIS III
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL IMPACT REVIEW
629 EAST MAIN STREET, SIXTH FLOOR
RICHMOND, VA 23219
FAX #804/698-4319

RECEIVED

AUG 08 2002

Charles H. Ellis III
Environmental Program Planner

COMMENTS

The proposed work does not significantly affect forest lands of the Commonwealth.

(signed) AM Frensley
(title) Forest Mgt.

PROJECT #02-124F 8/98
K.3.6 Commonwealth of Virginia, Department of Historic Resources

- May 27, 2004
- May 19, 2004
- November 19, 2003
- October 29, 2002
May 27, 2004

Mr. Karl A. Rohrer
Department of Rail and Public Transportation 3900
Jennantown Road, Suite 300
Fairfax, VA 22030

Re: Dulles Corridor Rapid Transit Project
DHR File # 2000-1061

Dear Mr. Rohrer:

We have received for review a copy of the report Identification and Evaluation Report - Archaeology (2004) which discusses the archaeological investigation of the project area as conducted by Gray & Pape. We are pleased to inform you that the report meets the Secretary of the Interior's Standards and Guidelines for the Documentation of Archaeological Sites (48 FR 44734-44742). However, the format of this report does not conform to our Department's Survey Guidelines (revised 2001). We ask that a report conforming to these standards be forwarded to our office at your earliest convenience. A copy of our Guidelines may be obtained by accessing our website at http://state.vi.net.or dhr/arch/DHR/archaeo index.htm.

Survey of the project area resulted in the identification of nine isolated locations. No archaeological sites were identified as a result of this survey. Although several sites have been previously identified within or adjacent to the Area of Potential Effect, no evidence of any such site was identified during this survey. The consultant indicates that modern construction, land use, and inundation rendered much of the project area unlikely to contain intact cultural deposits. Based upon the information provided, therefore, we concur with the recommendation that no archaeological properties will be affected by this project as currently planned.

If you have any questions about the Section 106 review process or our comments, please call me at (804) 367-2323, Ext. 140.

Sincerely,

Jen'una Wilson, Archaeologist
Office of Review and Compliance
May 19, 2004

Mr. Karl A. Rohrer
Virginia Department of Rail and Public Transportation
1550 Wilson Boulevard
Suite 300
Arlington, Virginia 22209

Re: Dulles Corridor Rapid Transit Project
Supplemental Draft Environmental Impact Statement (EIS)
Fairfax and Loudoun Counties
DHR File # 2000-1061

Dear Mr. Rohrer:

We have received the "Identification and Evaluation Report-Historic Architecture" for our review and comment regarding the above referenced project. The report records the results of the architectural survey for the length of the 23.1-mile project corridor. The Area of Potential Effect (APE) for architectural properties extends to 600 feet on either side of the centerline and included all buildings fifty years old or older.

The project consultants identified and recorded a total of 83 previously undocumented architectural properties within the APE. These newly recorded properties consist of 82 individual resources and 1 potential district. Additionally, Washington Dulles International Airport Historic District, a resource previously determined eligible for listing in the National Register of Historic Places, is also located in the project APE. The project consultants only recommend one other property as potentially worthy of National Register listing. This is the multi-family dwelling at 6714-6716 Osborn Street (DHR Survey No.029-5395). It is recommended as eligible under Criterion A (as a representative of rental housing at a more moderate scale) and Criterion C (for its architectural merit).

We concur with your evaluation of those properties recommended as not eligible for listing in the National Register. The building stock represented in the project survey is largely of undistinguished design without any association to a known historic event or significant individual.
May 19, 2004
Mr. Karl A. Rohrer

We disagree, however, with your assertion that the multi-family dwelling at 6114-6116 Osbom Street is worthy of National Register listing. Although a more substantial and architecturally interesting building than others included in the project survey, the Colonial Revival residence is less impressive when compared to others of its type. Additionally, the loss of its original windows represents a significant diminishment of its historic integrity. For these reasons we do not believe that 6114-6116 Osbom Street is eligible for the National Register.

We reiterate the National Register eligibility of Washington Dulles International Airport Historic District under Criteria A, B, and C. We also restate our concurrence expressed in our March 4, 2004 letter that the eastern boundary for the historic district should be established approximately 300 feet east of the Fairfax/Loudoun County line. This boundary location would preserve the "peek-a-boo" sequence that is essential to the Saarinen design.

We concur with the project consultants that the LPA's location within the boundary of the historic district and its interference with the three remaining "peek-a-boo" sequences of the original Saarinen design constitute an adverse effect on the National Register-eligible Washington Dulles International Airport Historic District. It is our understanding that the Department of Rail and Public Transportation (DRPT) and the Washington Metropolitan Area Transit Authority (WMATA) continue to refine the project design. As this process progresses, we request that you continue to consult with DHR regarding this undertaking. If DRPT and WMATA find that the adverse affect cannot be avoided, then it will become necessary to develop a Memorandum of Agreement (MOA) for the project.

If you have any questions about the Section 106 review process or our comments, please call me at (804) 367-2323, Ext. 114.

Sincerely,
Architectural Historian Office of Review and Compliance
Marc Holma.

Cc: Mr. Charles H. Ellis, ill, DEQ Mr. William Lebegem, MW AA
November 19, 2003

Mr. Karl A. Rohrer  
Virginia Department of Rail and Public Transportation  
1550 Wilson Boulevard  
Suite 300  
Arlington, Virginia 22209  

Re: Dulles Corridor Rapid Transit Project  
Supplemental Draft Environmental Impact Statement (EIS)  
Fairfax and Loudoun Counties  
DHR File # 2000-1061

Dear Mr. Rohrer:

We have received your request for our review and comment on the Environmental Impact Statement (EIS) regarding the above referenced project. The document attempts to address the environmental affects that the proposed construction of the 23-mile high-capacity transit line will have to include those on historic properties. Please accept the following comments as our response to the current EIS.

The subject document attempts to address “the potential long-term and construction effects” of the Dulles Corridor Rapid Transit Project for the Local Preferred Alternative (LPA). The EIS evaluates the effects of the project on two archaeological sites (44FX2662 and 44FX2405) and an historic district (Hunter Mill Road Historic District) newly added for consideration since the last draft EIS. Additionally, the current EIS re-considers effects on the Washington Dulles International Airport, a property eligible for listing in the National Register of Historic Resources, and a House located at 22017 Shellhorn Road in Ryan.

The revised EIS asserts that there would be no adverse effect to architectural resources as a result of the LPA. We cannot concur with this statement. The project corridor crosses the boundary of the Hunter Mill Road Historic District. Despite the claim that “because the Hunter Mill Road Historic District is located within an existing transportation corridor, impacts to the district associated with this project would be minimal,” you have not provided the Department of Historic Resources (DHR) sufficient information in order for us to agree with this statement. Similarly, the report cites “further analysis” confirming that the proposed LPA would not cause an adverse visual effect on the “peekaboo” sequence along the approach to Dulles Airport. We have not had the opportunity to review and comment on the aforementioned analysis. Therefore, we cannot agree that your assertion is correct. In fact, the issue of an appropriate National Register boundary for the airport is still an outstanding issue that must be settled before the discussion of effect can happen.
We welcome the opportunity to discuss this project further at our next scheduled Section 106 meeting on December 16, 2003. At that meeting we will also continue our dialogue regarding the development of a Programmatic Agreement (PA) for the undertaking. We request that you continue to consult with DHR through the Section 106 process on this undertaking.

If you have any questions about the Section 106 review process or our comments, please call me at (804) 367-2323, Ext. 114.

Sincerely,

Marc Holma, Architectural Historian
Office of Review and Compliance
October 29, 2002

Mr. Corey W. Hill
Northern Virginia Regional Manager
VDRPT
1550 Wilson Boulevard, Suite 300
Arlington, Virginia 22209

Re: Dulles Corridor Rapid Transit Project
DHR File Numbers 2000-1061

Dear Mr. Hill:

Thank you for providing our department with a copy of the Dulles Rapid Transit Project Public Hearings Report. We would like to reiterate that we look forward to working with your department, along with the federal agencies involved, in the successful completion of the Section 106 process for this project.

To date, the Section 106 process has not yet been initiated. Other than an initial meeting held on February 28, 2001, we have received no information regarding NHPA compliance. It is our understanding that the identification of previously identified historic properties is well under way and that the consultant will begin the identification of previously unidentified properties in the near future. Please bear in mind that the VDRPT and FTA will need SHPO concurrence on all eligibility and effect determinations.

Thank you again for the opportunity to review and comment on the referenced document. If you have any questions or if we can be of any further assistance do not hesitate to contact me at (804) 367-2323 ext. 140, lrichards@dhr.state.va.us or Marc Holma at ext. 114, mholma@dhr.state.va.us.

Sincerely,

Lily A. Richards
Archaeologist and Historian, Office of Review and Compliance

Henry Ward, Parsons
K.3.7 Commonwealth of Virginia, Department of Mines, Minerals, and Energy

- October 28, 2002
To whom it may concern:

The Virginia Department of Mines, Minerals, and Energy has determined that the proposed project will have no impact on the geology or mineral resources of the site. Please contact us if you require further information.

Gerald Wilkes
geologist senior, SERP, DMME
K.3.8 Commonwealth of Virginia, Department of Transportation

- February 25, 2004
- December 23, 2003
- October 28, 2002
- August 27, 2002
- August 4, 2002
- July 2, 1999
- December 7, 1999
The Northern Virginia District Office of the Virginia Department of Transportation (VDOT) has reviewed the February 2004 Public Hearings Report (PHR) for the Supplemental Draft Environmental Impact Statement (EIS) and General Plans for the Dulles Corridor Rapid Transit Project (Docket Number R03-6). Thank you for the Project Team's responses to our comments on the October 2003 Supplemental Draft EIS package.

VDOT reaffirms its full support for the State's identification of this project as a high priority project for the region. We present to you the following comments and suggestions and look forward to continued coordination with the Project Team, with the common goal of improved overall transportation in the region. Our comments are as follows:

- **Mitigation Measures** - In the PHR, the Project Team states that proposed mitigation measures are not part of the Project capital cost\(^1\). However, on p. 129 of the PHR\(^2\), the Project Team states that costs for mitigation of project impacts (noise, visual and traffic) *are* included as part of the Project's capital costs. Please clarify what mitigation measures are not included as part of the Project's capital cost and the reason for that decision. As mentioned in previous comments, VDOT believes that the traffic mitigation measures listed in the Supplemental Draft EIS do not fully address the future impact of this project on the existing transportation system. All Project-related impacts should be addressed, mitigated, and included in the Project's capital costs.

- **Noise Abatement** - In the PHR, it is stated that the noise methodology for this project followed FTA guidelines appropriate to transit projects\(^3\). In light of the current Council of Environmental Quality's (CEQ's) NEPA regulations\(^4\), the project must include a comparative analysis of all alternatives (including the No Build Alternative). Therefore, VDOT interprets that any and all environmental impacts (including noise) will be addressed as part of the project and conform with

2/26/04
CEQ's current requirements.

- **Station Access** - VDOT looks forward to continued coordination by the Project Team in determining how to provide complete station access during preliminary engineering. VDOT recommends that the Project consider improving pedestrian and bicycle connections in the general vicinity (within 1 mile radius) of the proposed Station locations. VDOT looks forward to continued coordination on issues of station access - including bicycle/pedestrian, taxi, bus, park and ride, kiss and ride, etc.\(^5\)

Please reference the possible future profile of Route 7 that would conflict with the relocation of the Tysons Central 7 Station entrance\(^6\) and specifically describe the conflict. It should be noted that any future roadway improvements envisioned in Tysons Corner are based on the Fairfax County Comprehensive Plan 2000 and were applied in VDOT's Transportation Collocation Study 2003. The design shown in the Collocation Study is just one possible future option for Route 7 in the vicinity of Tysons Central 7 and no profiles for this design have been published by VDOT. Further analysis is required to determine if moving the station entrance to the middle or west side is feasible.

- **Station Access by Other Modes** - WMATA has listed bicycle and pedestrian accessible routes as the lowest priority for access and proximity to a station\(^7\). VDOT recommends that in areas where no commuter parking is proposed, such as in Tysons Corner, these modes of transportation (bicycle and pedestrian) should be given a higher priority.

- **Final EIS** - VDOT understands that an updated traffic analysis will be performed during the Final EIS\(^8\) and looks forward to working with the Project team during this critical stage to determine adequate mitigation measures for the project. This traffic analysis should address impacts on the existing transportation system in general. Impacts will likely be far-reaching and not just limited to the immediate vicinities of the rail stations.

- **Preliminary Engineering** - As indicated by the Project Team in the PHR and particularly in view of new federal requirements regarding maintenance of traffic for every phase of construction, VDOT looks forward to being part of the future business advisory team during preliminary engineering\(^9\) to discuss and minimize construction effects and maintenance of traffic in Tysons Corner and possibly elsewhere within the project limits (i.e., Beltway/Route 123 interchange, Reston).

The PHR indicates that congestion management will be addressed during preliminary engineering.\(^10\) VDOT anticipates coordination by the Project Team on a congestion management plan during this phase of the project.

- **Revised General Plans** - VDOT is aware of the revisions proposed for the General Plans (PHR, A2). VDOT fully supports continuing, with full participation of transportation staff from Fairfax and Loudoun Counties as well as MWAA and TRIP II, a combined coordination effort with the DCRTP team to insure that the proposed rail alignments and station locations do not preclude potential future roadway improvements.

Thank you again for this opportunity for VDOT to provide comments and participate in this important project.
"The Final EIS process will identify the needed mitigation measures. These improvements will be programmed by DRPT or VDOT to complete construction by the dates identified in the Supplemental Draft EIS." (PHR, p. 86)

"The recommended improvements are not proposed as part of the Project. These improvements would be the responsibility of VDOT and the Project Team has shared your comment with them." (PHR, p. 87)

"The timing of mitigation improvements... VDOT may expedite any improvements if needed to address current traffic problems prior to completion of the project." (PHR, p. 88)

"The pedestrian circulation system identified by commenter noted would be the responsibility of local governments and/or the Commonwealth of Virginia, and would not be part of the Dulles Corridor Rapid Transit Project." (PHR, p. 112)

"Mitigation measures will become more detailed during the assessment of the LPA in the Final EIS and receive commitments in the Record of Decision. Costs for mitigation of project impacts (including mitigation measures for noise, visual and traffic impacts) are included as part of the Project’s capital costs." (PHR, p. 129)

"The Dulles Corridor Rapid Transit Project followed FTA noise and vibration methodology appropriate to transit projects. This methodology does not require an assessment of the future No Build noise condition." (PHR, p. 81)

40 CFR 1502.14 (Alternatives including proposed action) and 40 CFR 1502.16 (Environmental consequences)

"...In coordination with VDOT, Fairfax County, Loudoun Count and the Town of Herndon, a determination of the needed improvements will be made for station access beyond the station site plan, as well as the degree that the Project will fund such improvements, and their ownership and maintenance..." (PHR, p. 111)

"...Relocation of the Tysons Central 7 Station entrance would result in conflicts with existing development, and with possible future profiles of Route 7 envisioned by VDOT..." (PHR, p. 146)

"...WMATA has established a ranking (in descending order) of priorities for access and proximity to a station: pedestrian and bicycle/accessible route..." (PHR, p. A12)

"The Final EIS process will identify the needed mitigation measures. These improvements will be programmed by DRPT or VDOT to complete construction by the dates identifies in the Supplemental Draft EIS." (PHR, p. 86)

"The mitigation measures presented in Table 6.2-7 in Section 6.2.3 are based on the mitigation measures presented in Table 6.2-6 in the Draft EIS. As noted in the Draft EIS, a more detailed discussion of the recommended mitigation and its effects can be found in the Traffic Analysis and Station Access Study (June 2002). A new, detailed traffic analysis will be conducted for the Final
EIS. Mitigation measures will be further developed and revised as necessary. Information presented in the Final EIS document will clearly identify those measures that will be implemented as part of the Dulles Corridor project and those that will be implemented by others." (PHR, p. 87)

"...Additional analysis of traffic effects for both the proposed LPA and LPA Phase 1 will be conducted as part of the development of the Final EIS. Mitigation measures for anticipated effects will be identified. The effects at Wiehle Avenue Station under LPA Phase 1 will be an important consideration in the analysis." (PHR, p. 90)

"...Additional analysis of traffic effects for both the LPA and LPA Phase 1 will be conducted as part of the development of the Final EIS. Mitigation measures for anticipated effects will be identified. The effects at Wiehle Avenue Station under LPA Phase 1 will be addressed in this analysis." (PHR, p. 91)

"DRPT, as the project sponsor, will be the contracting authority for the project's implementation and the recipient of Federal and non-federal funds. It will acquire right-of-way, apply for environmental permits and bear responsibility for mitigation commitments..." (PHR, p. 161)

"Several roadway mitigation measures are proposed plus other intersection improvements that will be studied as part of the Final EIS... the Project will invest in measures to mitigate the effects of the additional traffic..." (PHR, A7)

9 "Specific to Tysons Corner, the Project Team will develop and administer a business advisory team to provide a forum for affected businesses and communities to participate in the implementation of the Project, particularly the mitigation of the construction effects and maintenance of traffic in Tysons Corner... during the preliminary engineering phase." (PHR, p. A11)

10 "Congestion Management measures will be further refined during preliminary engineering." (PHR, p. 91)
John M. Dittmeier, P.E.
Acting Project Manager
Assistant Project Manager for Environmental
WMATA Office of Extensions
Dulles Corridor Rapid Transit Project
1550 Wilson Boulevard, Suite 300
Arlington, VA 22209

703.247.6578
703.247.6602 FAX
jdittmeier@wmata.com

>>> "Allahdoust, Fatemeh" <Fatemeh.Allahdoust@VirginiaDOT.org> 12/23/03 4:43:40 PM >>>
Northern Virginia District Office of VDOT, in coordination with other appropriate VDOT sections, has reviewed of Dulles Corridor Rapid Transit Project, Supplemental Draft Environmental Impact Statement, Volumes I & II dated October 2003 documents transmitted to the District Office on October 29, 2003. The attached file (DCRTP_SDEIS) contains majority of our comments; however, additional comments may be sent to you by or before the end of the public comment period, December 29, 2003.

<<DCRTP_SDEIS_COMMENTS4.doc>>

VDOT acknowledges and reaffirms its full support for the State's identification of this project as one of the high priority projects for the region. We look forward to continuation of our very successful and well coordinated efforts in improving transportation in Northern Virginia.

Fatemeh F. Allahdoust
Senior Transportation Planning Engineer
VDOT-NOVA Transportation Planning Section
14685 Avion Parkway
Chantilly, Virginia 20151-1104

E-mail: fatemeh.allahdoust@virginiadot.org
Phone: (703) 383-2224  Fax: (703)383-2230
**Document Comments**

**Document:** Supplemental Draft Environmental Impact Statement -- Dulles Corridor Rapid Transit Project (Virginia Department of Rail and Public Transportation)

**Date of Document:** October 29, 2003

**Date of Comments:** December 23, 2003

<table>
<thead>
<tr>
<th>Page</th>
<th>para.</th>
<th>Line</th>
<th>Comment</th>
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</thead>
<tbody>
<tr>
<td>S-3; 1-2</td>
<td>3</td>
<td>2-11</td>
<td>&quot;FTA is considering only the first phase of construction for New Starts funding from the anticipated six-year reauthorization of the New Starts program. FTA may consider the proposed subsequent phase for FTA funding in the future, but has made no commitment to do so. Furthermore, FTA has determined that the first phase now being considered for funding has independent utility even if the subsequent phase is never built. (The first phase serves the high employment area of Tysons Corner.) Therefore, FTA will make a decision on the funding of the first phase without regard to possible future phases.&quot; If construction of Phase 2 is delayed, how will the Project address outstanding Phase 1 issues that will become prolonged and more critical as a result of this delay?</td>
</tr>
<tr>
<td>S-11</td>
<td>3</td>
<td></td>
<td>“Continue refinement of the proposed LPA through coordination with local communities to address outstanding issues related to project design, mitigation, funding, and implementation.” VDOT looks forward to continued coordination with the Project to address these issues.</td>
</tr>
<tr>
<td>S-13, 2-20</td>
<td>Table 2.2-2</td>
<td></td>
<td>Transportation Effects – Number of intersections requiring mitigation as a result of the project. This table indicates that the number of intersections at LOS F (am or pm) does not change from existing conditions, or gets worse. This information is not shown for the “LPA Phase 1 Opening Year” cell – please include. Also, please include the specific intersections (as listed in traffic mitigation section of SDEIS) and the proposed mitigation measures to address the traffic impacts at these intersections as a result of this project.</td>
</tr>
<tr>
<td>2-22</td>
<td>3</td>
<td>8</td>
<td>“Parking at Tysons West Station would be reduced to 500 spaces and be constructed as part of a joint development project. The specific location and design of the park-and-ride facility is not known at this time, but the anticipated cost of the facility is assumed as part of the Dulles Corridor Rapid Transit Project. Vehicles accessing the stations would use local roads.” Please explain how the traffic impacts of the proposed future 500 space park-and-ride facility and station access will be addressed.</td>
</tr>
<tr>
<td>3-18</td>
<td>Table 3.2-1</td>
<td></td>
<td>Summary of Long-Term Effects to Neighborhoods and Community Facilities. This table indicates that there is “no change” in effects of T6/Y15 vs. the Full LPA. This section of the report needs to address how increased traffic volume, traffic congestion, and spillover parking will be handled by the Project.</td>
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<td>3-20</td>
<td>6</td>
<td>5</td>
<td>“Proposed mitigation strategies for traffic impacts at Wiehle Avenue include adding turn lanes at intersections, parking management techniques, preferential treatment for rideshares; financial/time incentives, and information and marketing campaigns.” Adding turn lanes at intersections does not seem adequate to address the traffic impacts that will occur as a result of the interim terminal station located at Wiehle Avenue. Also, please provide background analysis as to how these proposed mitigation measures were determined, and identify roadway improvements that would fully address the traffic impacts.</td>
</tr>
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</table>
Effects to Parklands and Recreation – Although there is “no change” in effects from the DEIS, this table indicates that there may be possible impacts to future trails from Tysons East Station, Tysons Central 7 Station, Tysons 7 Station, Tysons Central 123 Station, and Wiehle Avenue Station. Please indicate actions the Project will take to address these possible impacts. It is important to provide non motorized facilities for transit riders to access these stations, particularly in Tysons Corner.

“Increased vehicle traffic at Wiehle Avenue Station may impact future trails proposed in Fairfax County’s Countywide Trails Plan (June 2002).” Please indicate actions the Project will take to address these possible impacts.

“The implementation of the proposed LPA, and, specifically the provision or expansion of park-and-ride and Kiss & Ride facilities, would result in increased traffic on local roadways around stations.” Please indicate in the Final EIS the measures required to mitigate traffic impacts on local roadways around stations and identify which measures will be completed by the Project and which measures will not be part of the Project.

“...the reduction in parking capacity at this station (Tysons West) would result in a considerable decrease in project-related trips at the Tysons West Station for all years. However, this reduction would not necessarily result in significant improvements to traffic impacts, over those presented in the Draft EIS for the Metrorail Alternative (T6/Y15), since the background traffic volumes would remain extremely heavy near the station area...” Eliminating the formerly proposed large parking structure will result in less impact to the local road network from vehicles anticipated to use the parking structure, than that identified in the DEIS. However, the smaller parking facility will generate additional conflicting (left turn) movements.

“Based on the mode of arrival data presented in Table 6.2-3, the 2025 park-and-ride person-trips that would be generated at the [Wiehle Avenue] station under the proposed LPA and proposed LPA Phase 1 are expected to change minimally compared to the Metrorail Alternative. Therefore, it can be assumed that the general traffic impacts expected in the vicinity of the station area would be similar to those documented in the Draft EIS for the Metrorail Alternative T6/Y15).” During the period when the Wiehle Avenue Station operates as the interim terminus of the LPA Phase 1, traffic patterns will differ substantially from those that can be anticipated when this station becomes an intermediate station. It can be anticipated that more riders will access the transit system at this location, since this will be the most convenient rail access option for potential riders to the west of Wiehle Avenue.

“...traffic volumes generated at the station would increase significantly during the peak hour at the Wiehle Avenue Station entrance for the proposed LPA Phase 1. As a result, levels of service and delay are expected to deteriorate at this station entrance in 2009 and in future years if the full LPA is not constructed. Furthermore, the excessive delay may cause extensive queuing thus making movements from the westbound Dulles Toll Road ramp to the northbound Wiehle Avenue approach difficult.” Since FTA is only considering funding for Phase 1 at this time, please indicate the measures the Project will take to minimize level of service degradation at the station entrance and its vicinity as a result of the Wiehle Avenue Station being the interim terminal station. For example, indicate how the Project will address the possibility of extensive queuing from the eastbound DTR ramp to northbound Wiehle Avenue in the AM and possibly the opposite movement in the PM.

In the sentence “...extensive queuing thus making the westbound...,” the word westbound may be incorrect. Queuing is expected on the eastbound ramp. (see above)
| 6-19 | 5 | 9 | "...the movement from the toll road ramp to Wiehle Ave approach is difficult." Please investigate bus routing plans that will reduce the impacts on the toll road ramps. An alternative to alleviate traffic congestion associated with the end of the line station for Phase 1 could be to build a direct access ramp to the station to route traffic from the eastbound toll road off-ramp to the station. |
| 6-19 | 5 | 9-10 | "The additional traffic entering the station via Isaac Newton Drive would have negligible effect on traffic operations." Traffic balances itself out and when the traffic is congested on the Wiehle Avenue corridor and the toll road ramps, drivers will use Sunset Hills Road. Therefore, a possible approach to balancing traffic may be to build a right turn only lane on Sunset Hills Road at the entrance to the station. |
| 6-20 | 4 | 1 | "With the design modifications, the effects of the proposed LPA would be similar to those presented for the Metrorail Alternative (T6/Y15) in the Draft EIS. However, if the full LPA is not constructed, 2,450 parking spaces would be constructed at the [Herndon-Monroe] station by 2025 to accommodate increased demand for transit services in the corridor." Since FTA is only considering funding Phase I at this time, it is unclear when the need for these spaces would be determined. Please clarify. |
| 6-21 | 2 | 1 | "Based on the mode of arrival data presented in Table 6.2-5, the project related traffic effects of the proposed LPA and proposed LPA Phase I are anticipated to be significantly less than those presented in the Draft EIS for the Metrorail Alternative (T6/Y15), due to a reduction in parking capacity at the Route 606 Station. However, this reduction would not necessarily result in significant improvements to traffic impacts, over those presented in the Draft EIS for the Metrorail Alternative T6/Y15, since the background traffic volumes would remain extremely heavy near the station area." Please explain the rationale for reducing parking capacity at this location and consequently, the impacts to roads and other parking facilities along the line. |
| 6-22 | 6.2.3 | The proposed mitigation measures should include parking areas for cabs and drop off and pickup areas for the passengers in the Tysons Corner stations where there are no provisions for kiss and ride lots. If the Project is relying substantially on foot access to the stations, this should be noted. |
| 6-22 | 6.2.3 | The proposed traffic mitigation measures listed do not fully address the impacts on the existing transportation system. Please provide technical analyses that validate and document the completeness of this list. |
| 6-24 | 5 | The Supplemental DEIS states that the implementation of the design changes to the proposed LPA would have no additional effects on the existing and planned bicycle and pedestrian facilities in the Dulles Corridor. Although there would be no additional effects, please indicate how the Project will provide adequate bicycle and pedestrian access to the stations. |
| 6-25 | 4 | 10 | "These modifications would require taking some of the I-66 right-of-way." Please ensure that these plans and agreements are well-coordinated with VDOT, so that current roadway operations and potential future improvements to I-66 are not affected. |
| 6-25 | 2 | 4 | This chapter should include a commitment to develop and implement a Congestion Management Program to operate during the construction of this project, especially in the Tysons Corner and Wiehle Avenue areas. |
| 6-26 | 2 | 4 | The sentence states that "Cut-and-cover construction would require lane closures that would disrupt traffic to a considerable extent." Revise the sentence to read "...off-peak lane closures..." |
| 6-26 | 3 | 3 | Change the sentence to read "...off-peak lane closures..." |
| 6-26 | 3 | This paragraph mentions the requirement of temporary lane closures. VDOT looks forward to working with the Project on a Congestion Management Program and Maintenance of Traffic Plan.
<table>
<thead>
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<th>Date</th>
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<td>6-26</td>
<td>3</td>
<td>4</td>
<td>Change the sentence to read “…off-peak lane closures…”</td>
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<tr>
<td>6-27</td>
<td>1</td>
<td>4</td>
<td>“Those improvements that would occur on the I-66 right-of-way acquired from the Virginia Department of Transportation (VDOT) would not affect current roadway operations or planned roadway improvements.” Please ensure that these plans and agreements are well-coordinated with VDOT, so that current roadway operations and potential future improvements to I-66 are not affected.</td>
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<td>10-5</td>
<td>1</td>
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<td>“Once the proposed LPA is selected and prior to circulating the Final EIS, every reasonable effort will be made to resolve interagency issues related to the proposed action. If significant issues remain unresolved, these issues, and the consultations and efforts made to resolve the issues, will be documented in the Final EIS.” VDOT looks forward to continued work on these unresolved issues, as well as a Project commitment for mitigation of traffic impacts (maintenance of traffic) and congestion management during construction, and identification and implementation of overall measures to minimize level of service degradation on local roadways.</td>
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<td>10-5</td>
<td>3</td>
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<td>VDOT looks forward to continued coordination regarding permitting requirements and possible development of a master agreement between VDRPT and VDOT.</td>
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<td>Regarding the potential establishment of an eastern boundary of the Dulles International Airport Historic District, any decision/actions that would lead to minimization of harm to the district should not preclude (or should take into account) any future surface transportation improvements on the DTR/DAAR (Sections 3.5 &amp; 7) for the entire length of the Project.</td>
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<td>The document should reference Fairfax County’s development of a watershed management plan for the Difficult Run watershed (Section 4.2).</td>
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<td>The SDEIS does not provide a noise assessment for the No-Build Alternative. (Section 4.7).</td>
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</table>
Mr. Corey W. Hill  
Northern Virginia Regional Manager  
Virginia Department of Rail and Public Transportation

The Northern Virginia District Office of the Virginia Department of Transportation (VDOT) has reviewed the October 2002 Public Hearings Report (PHR) for the Draft Environmental Impact Statement and General Plans for the Dulles Corridor Rapid Transit Project (Docket Number R02-1). Thank you for the Dulles Corridor Rapid Transit Project (DCRTP) Team's responses to our comments on the June 2002 DCRTP DEIS package. VDOT reaffirms its full support for the State's identification of this project as a high priority project for the region. We present to you the following comments and suggestions and look forward to continued coordination with the DCRTP Team, with the common goal of improved overall transportation in the region.

Mobility - The DCRTP Team concludes that "each of the rapid transit alternatives will help to increase overall mobility in the corridor, the counties, and the region..." and will "increase overall transportation capacity and person throughput in the corridor." (p. 42) and states that the DCRTP "Project would not resolve traffic gridlock, however, it would provide an alternative to driving the automobile." (p. 271).

To maximize overall mobility, it is critical that the current capacity of the road network be at least maintained and that careful consideration be given to the Team, VDOT and the counties to not precluding any potential future road improvements. We agree with the need for the Team to continue detailed coordination with VDOT, Metropolitan Washington Airports Authority (MWAA) and the counties, to insure that the proposed rail line and the road network collocate as follows:

a. Maintenance of Traffic - The PHR indicates that "As stated on page 6-62 of the Draft EIS, maintenance of traffic plans would be developed for all construction activities that would impact regional and local roadways." To the extent possible, all construction requiring lane closures would be done at night, on weekends, or in the off-peak period." (p. 330). VDOT looks forward to working with the Team and reviewing the Project's Maintenance of Traffic Plans in detail. In general, the number of lanes along corridors can not be reduced during construction except during nights or weekends. Congestion Mitigation Plans will need to be developed and coordinated with VDOT to insure project constructibility.

b. Current capacity of existing road network - VDOT understands that the DCRT Project will replace existing roadway capacity where this is affected by the Project, by relocating or otherwise modifying road elements where necessary, in consultation and coordination with VDOT and the counties.

c. Potential future road improvements - VDOT fully supports continuing, with full participation of transportation staff from Fairfax and Loudoun Counties as well as MWAA, a combined coordination effort with the DCRTP Team to insure that rail and highway elements can collocate now and not to preclude potential future road improvements. With respect to
possible future road improvements, it should again be noted that, where the DEIS and the PHR mention or list planned roadway improvements, specific citations to the official document(s) should be made: the approved Six Year Program, the Transportation Improvement Program (TIP), the Constrained Long Range Plan (CLRP), and the County Comprehensive Plans. Please refrain from using general comments about "VDOT is planning to construct/widen, etc" that may be based on concepts developed in coordination with County staff, based on Comprehensive Plans, but lack programming or funding commitments from any agency or entity at this time. Such statements may give the false impression of imminent, approved or funded projects (e.g. pages 266, 270).

Utilities - Consideration should be given in the early stages to "utility corridors" when utility relocations are required for the DCRT project. Future impacts and costs will be reduced if the utilities are not required to be relocated again as any planned improvement in the areas is initiated.

Programming of Improvements by VDOT - Reference has been made in the June 2002 DEIS and Section 4(f) Evaluation report, "Table 6.2-6: Summary of Traffic Issues and Proposed Mitigation Measures" and identifies VDOT as the "responsible agency", (Volume I, on pg. 6.34-5). Naming VDOT as the responsible agency needs to be deleted; the measures identified are mitigation measures for features / impacts of the DCRT Project, as indicated on page 6-32: "...but merely improvements that could be employed at each intersection to alleviate future traffic impact from the project" and their costs are part of that Project. These mitigation measures are not projects that VDOT has programmed or funded. When requested, VDOT will evaluate the proposed mitigation measures, in conjunction with the Congestion Mitigation Plans (which will include further analysis of required improvements, their impacts, feasibility and cost estimates).

Transit-related development - The DCRT Team includes several statements about the transit-related development, consequent increased traffic and need for careful and timely decisions to mitigate impacts. DCRT team responses and PHR page references are included below:

- "Overall, though the transit-related growth associated with mass transit implementation will result in increased development and increased traffic congestion in station areas, this change is consistent with local goals and comprehensive plans." (p. 43)
- "Actual implementation of transit-oriented development and the timing and increase in densities is under the jurisdiction of the local government in the area, so any mitigation needed to support the increase in densities is also under the jurisdiction of the local government, and they have included measures in their land use regulations." (p. 275, 384, etc.)

VDOT looks forward to continued coordination with the counties on decisions about the impact of proposed developments per their Comprehensive Plans and any related future roadway improvements. Collectively, our detailed review of individual transit-development applications will be critical as the counties work to seek balance between level of development, mitigation measures and timing of future roadway improvements.

Coordination required before April 2003 Final EIS submission to FTA - The DCRT Team has stated that, should there be changes to the Project as the result of the determination of mitigation measures and of continuing coordination, the Team will seek approval of amendment to the General Plans. Following is a sampling of the issues that we see will need detailed coordination with VDOT, MWAA and the appropriate County staff:

- Maintenance of Traffic during construction (including Congestion Management Plans).
- Design and programming (including more in depth assessment of traffic volumes and patterns, access, constructibility) of related roadway improvements. An example is the proposed Route 7/Tyco Road 2,000 car parking facility.
- Assessment of impact and planning for mitigation and/or possible future improvements at various locations in Tysons, Reston, Herndon, Dulles National Airport and Eastern Loudoun County.

- On-street feeder bus bays for Tysons Central A, B and C stations (p. 274).

Thank you again for this opportunity for VDOT to provide comments and participate in this important project. Please let me know if I can be of further assistance.

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Office: (703) 383-2224  Fax: (703) 383-2230
Mr. Corey W. Hill  
Northern Virginia Regional Manager  
Virginia Department of Rail and Public Transportation  

Northern Virginia District Office of VDOT, in coordination with other appropriate VDOT divisions, has conducted a review of the following documents transmitted to the District Office on June 27, 2002:

* Draft Environmental Impact Statement  
* General Plans, Line and Systems  
* General Plans, Facilities  
* Technical Reports  

VDOT acknowledges and reaffirms its full support for the State’s identification of this project as one of the high priority projects for the region. I present to you the following comments and suggestions and look forward to continuation of our very successful and well coordinated efforts in improving transportation in Northern Virginia.


* Pg. 13, item 2.2, BRT Alternative: 2nd paragraph states: "BRT stops would be located at facilities outside the median [of the DAAR]", and "BRT vehicles would provide access to stops by leaving the DAAR or the Greenway". Examples or descriptions of the BRT stops would be very helpful for the reader to better understand the difference between BRT stations and BRT stops.

* Section 3.3, Pg. 22, 2nd full paragraph - The report states that volumes for the various ramps proposed by VDOT to access Route 7 and 123 expressways from the local roads were necessary to complete the balancing process, and that these were obtained from the Tysons Corner Route 7 and Route 123 Transportation Collocation Study (Collocation Study), State Project Number TPD 11671-2-01, dated April 3. It should be noted that the Draft Collocation Study report was conducted within a compressed 3-month schedule. As stated in Chapter VI of the Collocation Study, traffic growth was based on a previous report (June 2000 Route 7/123 Corridor Study) and on several assumptions. It is hoped that any traffic volumes used in the DCRTF study included an understanding of the Collocation Study’s context and limitations, and a verification of the assumptions used. We recommend that both the Traffic Analysis and Station Access Study and the Travel Demand Forecasting Methodology reports include a description of: the assumptions and how they were verified or modified as appropriate; and how the resulting volumes were determined to be consistent with the overall forecasting effort.
conducted specifically for the DEIS.

* Section 6.3, pg. 134, Table 6-2 - Footnote 1 states that "Direction not specified by VDOT" yet numbers refer to Dulles Toll Road eastbound. Note 2 refers to Route 50, yet Footnote 2 refers to HOV lane on I-495. It appears that the text of the footnotes was changed between the 95% Review Draft and this latest (June 02) report, but the corresponding notes on the table were not revised. Footnote 1 in the 95% Review Draft referred to "Volumes exclude high occupancy vehicle lanes; no direct comparison to year 2000 can be made" (please note that by year 2000 (base year in table), HOV lanes were already in place and, for the DTR, volumes are available by lane.

* Chapters 9 through 17:
The proposed interchanges at 7/West Park-Gosnall and 123/International are not identified in the CLRP. Although an interchange at an isolated location does not need to be called-out from an air quality conformity standpoint, a series of interchanges in close proximity to one another could change the functional classification (for modeling) of the road from arterial to freeway (which would have to be accounted for in the model).

* Monroe St/Van Buren in the town of Herndon are not identified for improvement in the adopted FY-01 TIP / CLRP. East Elden St. is identified in the adopted FY-01 TIP / CLRP as reconstructed as a 4-lane section between Monroe St. and the Herndon Parkway East and widened to 6 lanes between the Herndon Parkway East and the Fairfax Co. Parkway. Both widening and reconstruction have a completion date of 2005.

* It is suggested that, when discussing the Planned Roadway Improvements, the DCRTP DEIS report make specific reference to their source official documents: the Six Year Program, the Transportation Improvement Program (TIP) and the Constrained Long Range Plan (CLRP), and the Fairfax County Comprehensive Plan. Please refrain from using statements about "VDOT's decisions" that are not backed up by the approved Six Year Program. For projects beyond the Six Year Program time horizon, reference should be made to the source document (TIP, CLRP as appropriate), noting that these documents are the result of cooperative efforts of multiple agencies at various levels (federal, state, local) and subject to public review. Please remove all references to VDOT deciding that specific interchange and road widening projects (Route 7 and Route 123) are "high priority" (e.g. section 10.1 on pg. 173, section 11.1 on pg. 187, section 12.1 on pg. 203, section 14.1 on page 233). Prioritization is typically a result of coordinated evaluation with input from Fairfax County, and in accordance with Fairfax County's Comprehensive Plan. Perhaps the consultant is making inferences from preliminary or final VDOT-funded consultant reports such as the 6/00 Transportation Corridor Study by PHR&A, or the 2/5/02 Tysons Corner Selected Improvement Compatibility Study by FTG. It should be noted that although these reports are used by VDOT as tools for analysis/coordination, their recommendations do not necessarily imply VDOT's concurrence.

* Existing traffic volumes appear low. For example the intersection of Route 123 at Tysons Boulevard indicates 90 vehicles during the a.m. peak and 62 vehicles during p.m. peak making left turns from southbound Tysons Boulevard onto eastbound Route 123. A recent traffic study done in the same area indicates that the existing a.m. left turn (same as above) as 392 vehicles and 1845 vehicles during the p.m. peak. All numbers need to be checked properly and appropriate numbers used as a starting base.

* The County has the nondegradation policy in place it is unclear as to how the increased development is planned to be mitigated. Also how is all the planned future higher densities addressed in the study? Are they included in the overall growth rate?

* Pg. 19 - Highway impacts are not analyzed in detail, only very generic information is presented in the document. No supporting data/analysis were provided. Statement is made that there are Synchro, HCM, Signal2000 and Transyt-7F files available for review but they were not included in the package. All the files in an electronic format as well as
paper copies need to be provided for the Department's thorough review. The report includes summary findings that are very generic in nature. Highway corridor impacts need to be addressed.

* Accident data and analysis are very generic and does not include the details needed. Specific attention needs to be given to address the pedestrian safety concerns.

Travel Demand Forecasting Methodology and Results & Travel Demand Forecasting Methodology and Results Appendix - Technical Report (June 2002)

* An executive summary as previously suggested, is highly recommended. This summary ought to include information such as transit modal split, LOV and HOV for both with and without Transit (i.e. Tyson or Herndon to DC). It is unclear what are some of the critical assumptions and data sources used.

* Screen-line volumes for the forecasted years under all alternatives, including no-built should be included.

* It is very difficult to assess whether Highway LOS for the corridor has been addressed. It would be helpful to include Highway LOS for both with and without transit improvements and increase land use density, in order to evaluate highway impact and related mitigation measures identified. "Dulles Corridor Transit Trip Summary, 2025 Alternative T4, Home Based Work Person Trips" Table (in the Appendix I, no page #, no table #) shows 64.6% transit share from Tyson to DC Core. In this case, please show the impact on the highway LOS.


* Page 28 - Shows the summary of dead head calculations. The Metro rail Service and inspection yard sites are listed in column 1 but not show in the report. Please include a map showing these potential locations for the Metro rail Service and inspection yard sites.

* Page 29 - Table 3-8 Some of the columns heading show units and others particularly the distance column does not show any units. Please check all the tables to include the units for columns.

* Chapters 1 &2 - Header on most of the pages incorrectly displays Index of Figures in the upper right hand corner on most of the pages.

* Page 23 - 2nd paragraph second line should read New Carrollton would be replaced instead of New Carrollton would replaced.

Land Use and Socioeconomic - Technical Report (June 2002)

* Page 7 - PURPOSE - "By providing a high-capacity transportation choice for travelers, the proposed project would be better able to meet the anticipated increases in travel demand, reduce the projected use of existing facilities, and help reduce further congestion in the corridor."

This statement would be true if the construction of rail transit in the corridor did not also allow for increased densities. However, the comprehensive plans within the local jurisdictions provide for higher densities with the introduction of rail transit. Therefore, any reduction in auto travel due to the availability of rail transit is exceeded by the increase in demand resulting from the increased densities, and the anticipated benefits are lost.

"Moreover, the ability of the proposed improvements to increase person-moving capacity over long distances with fewer numbers of vehicles,
should help minimize future increases in vehicle miles traveled in the corridor and vehicle emissions."

This statement would be true if the construction of rail transit in the corridor did not also allow for increased densities. However, the comprehensive plans within the local jurisdictions provide for higher densities with the introduction of rail transit. Therefore, any reduction in auto travel due to the availability of rail transit is exceeded by the increase in demand resulting from the increased densities, and the anticipated benefits are lost. In addition, because the proposed improvements only provide for increased transit opportunities in only the east-west directions, the increased travel demand in the north-south directions due to the increased densities is not even partially reduced by the proposed construction, again reducing the anticipated benefits.

* Page 8 - TABLE 1-1: GOALS AND OBJECTIVES "Goal 4 - Support Environmental Quality" - The many objectives listed under this goal would be true if the construction of rail transit in the corridor did not also allow for increased densities. However, the comprehensive plans within the local jurisdictions provide for higher densities with the introduction of rail transit. Therefore, any reduction in auto travel due to the availability of rail transit is exceeded by the increase in demand resulting from the increased densities, and the anticipated benefits are lost. In addition, because the proposed improvements only provide for increased transit opportunities in only the east-west directions, the increased travel demand in the north-south directions due to the increased densities is not even partially reduced by the proposed construction, again reducing the anticipated benefits.

* Page 188 - Table 4-8 - SUMMARY OF COMMUNITY IMPACTS OF METRORAIL ALTERNATIVE
"Access Changes - T1, T6, T9, and T4
.. congestion affects two neighborhoods .. ."

This statement would be true if the construction of rail transit in the corridor did not also allow for increased densities. However, the comprehensive plans within the local jurisdictions provide for higher densities with the introduction of rail transit. Therefore, any reduction in auto travel due to the availability of rail transit is exceeded by the increase in demand resulting from the increased densities, and congestion will increase throughout the corridor and beyond.

"Property Values - T1, T6, T9, and T4
Increase at station areas"

The comprehensive plans within the local jurisdictions provide for higher densities with the introduction of rail transit. Therefore, any reduction in auto travel due to the availability of rail transit is exceeded by the increase in demand resulting from the increased densities. While this may still result in increased property values at station areas, the increase in congestion throughout the corridor may result in a decrease in property values in other areas.


* Page 5 - Need - "The projected increase in residents and job opportunities, will result in markedly higher traffic volumes on highways and streets in the Dulles Corridor and throughout the region."

* "Given that the corridor transportation network currently experiences traffic volumes that meet or exceed the capacity of roadways and intersections, causing severe congestion, these increases in traffic volumes are only expected to worsen conditions."

* "Because the existing transit system in the Dulles Corridor
operates on the congested roadways described above, it generally offers a poor alternative to auto travel."

While these are valid considerations, there is no information as to how this impact will be mitigated other than a mention of the increase in rail transit opportunities with the Metro rail Alternative. While it is recognized that rail would provide some mitigation for congested auto travel in the east-west direction, in this instance the increase in land use densities allowed with the provision of rail transit would result in an increase in traffic that is greater than any reduction that which might be provided by rail patronage. Additionally, it should be anticipated that there will be no reduction in congestion, but an increase in congestion, in the north-south direction.

Page 28 - Tax Revenue Effects - "Construction of the Build Alternatives will require the purchase of some private land and/or structures for easement, rights-of-way, parking and station facilities, thereby removing these properties from the existing local tax base."

Should any necessary lands be obtained through a process that would allow for density transfers, which is often the case; there would be no loss of tax revenue. In addition, under this process there may be no cost for acquisition.

Page 105 - Secondary Effects Related to Density Increases - "The allowable transit-related growth will result in an increase in development in the immediate vicinity of stations throughout the corridor, but does not represent a dramatic increase over the overall level of growth allowed in Fairfax and Loudoun counties."

As this is already a congested corridor, "an increase of approximately 38 million of 43 million square feet of development over the Baseline Alternative (Page 112)" with associated increase in work vehicle trips of "20,000 per day" (Page 114) and increase of non-commute vehicle trips of "55,000 per day" (Page 114), does pose a significant threat for increased delays.

"transit related growth allowed in Loudoun County was not included (in) the supplemental transportation demand analysis."

One proposal in Loudoun County calls for the development of some 19 million square feet of office space alone at the Route 772 Station. No resultant impacts of such development on the Metro rail system, the surrounding roadways, and the corridor in general are provided in the report.

"Even without mobility benefits associated with the provision of rapid transit improvements, the corridor is projected to absorb high level of development under the Baseline Alternative."

While it may be possible to physically add all this new development under the Baseline Alternative, it does not seem reasonable to assume that it would actually be built with the higher traffic congestion that would result from such development.

Page 125 - MITIGATION - The mitigation strategies contained in the report speak mainly to the opportunity of the local jurisdictions to limit development in the area of the transit stations if undue congestion is experienced in the area. The report does not look at the impacts to roadways running in a north-south direction or otherwise outside the corridor. As indicated, these roadways would also be affected by the increase in density at the transit locations.
Cultural Resources Technical Report - (June 2002)

* As stated in previous comments, this study has not established which resources previously identified are in fact eligible for the National Register. This is a fundamental flaw.... There are clearly a number of resources previously documented within the APE (for example Bois de Gosses, Shiloh Baptist Church, Plantation, Wiehle/Sunset Historic District, etc) that have not been evaluated by the FTA or VDHR. Comments on eligibility for each resource need to be obtained from VDHR.

* Without knowing which resources are eligible for listing in the National Register, an effect determination cannot be made.

* Without knowing which resources are eligible and what their boundaries are, Section 4(f) evaluations cannot be made.

* If documentation is provided by the FTA (or their consultants) to VDHR, several of the resources may well drop from consideration in the context of Section 106. There appear to be very few resources that will be eligible for listing in the National Register.

* The report states on page 111, that additional architectural resources may exist beyond those previously documented. This is a potentially fatal flaw in the study... if there are other eligible historic properties they need to be identified now. Their location may well effect a location decision (via Section 4(f)).

* Page 111 - Archaeological survey needs should be depicted on maps.


* No additional comment since the review comments of the 95% Draft EIS, on 3/10/02

Natural Resources Technical Report (June 2002)

* The 95% Draft EIS Technical Report was reviewed and deemed to adequately address Natural Resources issues. Since the Final Draft Technical Report appears to be essentially unchanged, we have no further comments on this section of the report.


* Table 3-13 - Several office, restaurant and retail establishments are incorrectly classified as FTA Land Use Category 3 sites. These and similar commercial and industrial properties are not considered noise-sensitive according to FTA.

* The term "Baseline Alternative" as used throughout the report should be more appropriately termed the "No-Build Alternative." While FTA does not specifically require a noise assessment for the future No-Build Alternative, it is appropriate to provide such an assessment where significant changes in the noise environment are anticipated due to factors unrelated to the project. Typically, the No-Build conditions are similar to the existing conditions such that no assessment is needed. However, the No-Build case needs to be addressed in the EIS and thus it is of interest to know if impacts are expected without the project. Such information can be useful in determining if mitigation for the build alternatives is reasonable and feasible.

* The first sentence on page 93 incorrectly states, "While vibration criteria are generally used to assess annoyance from transit sources at the
exterior façade of receptors, ground-borne noise, or the rumbling sound due to vibration room surfaces, is typically assessed indoors." In fact, both ground-borne vibration and noise effects are assessed indoors.

* Section 4.0.2 should be more specific with regard to the locations and proposed methods for mitigating vibration impacts from Metro rail operations. In addition to the potential measures listed, the use of spring rail or moveable point frogs at crossover locations should also be considered.

* Reference section 5.0 does not make mention of the VDOT Noise Abatement Policy.

* No additional comment since the review comments of the 95% Draft EIS, on 3/10/02

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* Pg. S-27, 4th paragraph. (Summary, Environmental Effects) - Next to the discussion for secondary effects of increased development at transit stations, the sidebar comments (right margin) states one of the potential positive effects as being "Reduction in traffic congestion". By itself this statement appears counter-intuitive (you would expect more traffic congestion caused by increased development, as only a portion of new trips are captured by transit). Suggest the margin comment be further explained, such as by "Potential positive effects of concentrated vs. more spread out development".

* Pg. 2-13 - The adopted FY-01 TIP / CLRP specifically identifies the following projects in the Route 28 Corridor between I-66 and VA 7:

Partial interchange at Barnsfield Road, open to traffic in 2003
VA 066 Interchange, open to traffic in 2005
VA 625 Interchange, open to traffic in 2005
VA 606 Interchange, open to traffic in 2005
Westfields Road Interchange, open to traffic in 2006
McLearen Road Interchange, open to traffic in 2006
Innovation Avenue Interchange, open to traffic in 2006

Study widening to 8 lanes and upgrading to a freeway between I-66 and the Dulles Toll Road, study to be completed by 2020
Study upgrading to a freeway between the Dulles Toll Road and VA 7, study to be completed by 2020

The draft FY-03 TIP / CLRP specifically identifies the following projects in the Route 28 Corridor between I-66 and VA 7:

Partial interchange at Barnsfield Road, open to traffic in 2003
VA 066 Interchange, open to traffic in 2007
VA 625 Interchange, open to traffic in 2005
Upgrade VA 28 to a freeway (construct interchanges / eliminate at-grade access points) and widen to eight lanes between I-66 and VA 7, open to traffic in 2015. Interchanges and widening could occur in the 2006 to 2015 time frame with all improvements open to traffic by 2015.

* Planned Roadway Improvements - It is suggested that, when discussing Planned Roadway Improvements, the DCRTP DEIS report make specific reference to their source official document(s): the Six Year Program, the Transportation Improvement Program (TIP) and the Constrained Long Range Plan (CLRP), and the Fairfax County Comprehensive Plan. Please refrain from...
using statements about "VDOT's decisions" that are not backed up by the approved Six Year Program or referred to in official correspondence. For projects beyond the Six Year Program time horizon, reference should be made to the source document: TIP, CLRP as appropriate (noting that these documents are the result of cooperative efforts of multiple agencies at various levels -- federal, state, local -- and subject to public review), and/or the Fairfax County Comprehensive Plan. Example planned improvements that need source clarification:

- Pg. 2-13. To statements that Route 7 /Route 123 within Tysons Corner are planned for expansion to 8/ 6-8 lanes by 2010
- Pg. 6.6, 2nd to last paragraph: "VDOT is planning several major roadway improvements along Routes 7 and 123 in Tysons Corner.... widening of Routes 7 and 123, and the construction of grade-separated interchanges at Route 7 / Westpark Drive, Route 7/ International Drive, and Route 123/ International Drive... by 2010." (Recall 8/4/00 letter by Tom Farley, included in report's Appendix, asking that the team consider and evaluate the improvements planned by 2010 that are included in the Fairfax County Comprehensive Plan and the regionally adopted Constrained Long Range Plan (CLRP).

* Pg. 3-11, Fig. 3.1-2 - Proposed Land Use in the Corridor: Map and insert identify major roads (Dulles Toll Road, Beltway) as Open Space. Suggest additional label in the legend.

* Pg. 6.53: Table 6.3-11 - suggest adding "Corridor Transit" to beginning of title

* Pg. 8-3 : Table 8.2-2 - suggest adding: in $ million

* Pg. 11.16. - Dulles Corridor Steering Committee is "composed of the executives from each of the project's funding partners". Suggest adding that the committee is chaired by a member of Virginia's Commonwealth Transportation Board (CTB), representing VDOT and VDRPT.

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* No Comment.


* Site Plans for the Route 772 Stop indicate North and South of Dulles Greenway alternatives with Proposed Transit Connector Roads to be constructed by others. There is considerable cost in these roadway improvements particularly the bridge crossing Dulles Green Way. The agency charged with building these roads would need to program and fund these commitments and look at the cost verse area of service/ease of service vs. roadway network serviceability. For example the North Station Facility option could connect to Route 643 with traffic routing to Route 772 interchange avoiding the expensive bridge crossing of Dulles Green Way. This would also effect development / access to the areas of stations.

* Station at Route 28 Stop has a proposed overpass by others shown with no tie into North Green Drive. Given that this road bisects the development and parking of the South Station and will profoundly affect entrance to North Station, there needs to be an agreement by builder of overpass prior to the construction of these stations and the dedication of right of way.

* Sheet 690 - Does pedestrian bridge have adequate clearance over the Herndon Monroe Park and Ride Ramp from Structure?

* Reston Parkway Stop - Shows proposed underpass by others directly conflicting with station- By who? Is it part of regional network? Does
this station preclude overhead crossing over of roadway?

* Sheet 774, Tysons West Station - The frontage Road between West wood Center Drive and Spring Hill Road needs to be available for the frontage road system.

* Sheet 796- Do the Pedestrian Tunnels conflict with a depressed Route 7 that would be needed with 7/123 Interchange modifications per the collocation study?

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* Dulles Green Way was recently widened to 6 lanes from Mainline Barrier Toll Plaza to Route 659. This generally leaves a median 'of 40' beyond shoulder (20' each side). Rail plans should update base as some locations may require more extensive roadway work.

* SWM ponds may require access for maintenance- show how this is to occur. Also these are regarded as hazards to be protected by guardrail-If joint pond, the pond will need to meet state or county design standards as appropriate.

* Review guard rail / barrier requirements beyond normal roadway warrants if a vehicle striking obstruction would result in hazard or result in collateral hazard to road or rail if hit. IE would damage to facility cause further injury or lose of life (power stations/control facilities).

* Limited access facilities have special requirements that must be met even for the infrequent access to maintain ponds/power stations. If access can be reasonably or economically provided from other than the limited access facility this is recommended.

* All structures including columns should be of adequate design, location and depth so that planned / future interchanges shall not have to replace, reinforce or underpin these structures.

* In general, structures/column placement at intersections should be placed to meet sight distance requirements for streets, side road and entrances.

Comments below apply to most sheets in a series but have been identified at sheet first encountered.

* Sheet 015 L1 Alignment- Cross over location at 1910+00 is pushing curve out at sta. 1900+00 and will require significant roadway work due to overlap. Can this cross over location be shifted?

* Sheet 103 Sta. 1869+00 Most of gore as loop meets EB Dulles Greenway will need to be reconstructed. Match line likely further back.

* Sheet 019 Sta. 1820+00 1815+00 Can curve be made shallower (increase radius) shifting rail station 1810+00 slightly South East to avoid reconstruction of WB Dulles Greenway.

* Sheet 026/30 - Stat 1782+00 has a possible SWM pond located in off ramp gore. This would be an un-ideal location as potential hazard to vehicles leaving the road. Would alternate site be available to the southeast of the ramp or further north?

* Sheet 30- what is clearance from rail structure to shoulders may require roadway widening (bow out) as 6th lane continues in this area. The relatively flat skew at 1757+00 will require a relatively large span bridge does vertical alignment allow for required structural depth and clearance over roadway?
* Sheet 42-Sta 1480+00 SWM pond widened-evaluate need if further guard rail is required due to proximity of hazard to road. Provide access from Worldgate Dr.

* Sheet 43- Will pedestrian bridge have adequate clearance over Herndon Park and Ride Ramp Structure?

* Sheet 43/44 - Sta. 1440+00 skew of station results need to rebuild EB DAAR- Can different skew or shallower curve/transit be used to stay within existing DAAR bubble and lessen impacts?

* Sheet 44 - Extend guardrail along ramp to protect TBS/RTC

* Sheet 50 - 1275+00 SWM/BMP protect with guard rail- how will it be accessed or maintained? 1260+00 SWM/BMP will it be maintained / accessed from Sunset Hills?

* Sheet 51 Sta. 1232+00 SW quadrants SWM pond- Coordinate will VDOT Hunter Mill Road Project. May result in joint pond within Loop.

* Sheet 56- Sta. 1090+00 to 1080+00 drafting issue show the rail alignment within the median. If shoulder really needed to be rebuilt, indicate on other plans.

* Sheet 57- Configure SWM pond sta. 1061+00 to avoid rebuilding shoulder and guardrail on WB DTR

* Sheet 58- Sta. 1030+00 structure is spanning loop ramp, a more relaxed curve could allow column placement in area between DTR/outer ramp and loop. This would also pull column out of gore Sta. 1026+00 where it presents a hazard. This might only be achievable if cross over location is moved.

* For Tysons Corner area please incorporate comments made during collocation study.

* Sht. 059 Frontage Road should be maintained between Westwood and Spring Hill Road. Ramp or CD road may some day tie into frontage road system.

* Sht. 060 at Sta. 980+00 Verify that frontage road lane shift at portal meet min. standard.

* Sht. 061 Sta. 946+00 Verify that underground rail (any alternative) is below any interchange configuration with International Drive below Chainbridge Road with Chainbridge Road at present day elevation.

* Sht. 64 Sta. 880+00 - Can curve be modified to avoid column near ramp gore or in Rte. 123 shoulder? Possibly shift to North side of 123.

* Sht. 78 Sta. 980+00 - Ensure TPSS 5 is sufficiently below grade so that interchange configurations shown in Tysons collocation study are not effected or impacted.

* Sht. 79 Station 969+00 - Is blocked out area offset to not impact Route 123/7 configurations shown in Tyson’s Co-location study. Move EA out of loop ramp.

* Sht. 82 - See comments for sht. 58

* Sht. 85 - Ensure rail structure is sufficiently below grade to not impact Interchange at Rte. 123/International Drive if Chain Bridge Road is maintained at present grade. This may be a more stringent requirement than shown in the Collocation Study. Any lack of clearance should be resolved prior to any construction.
* Sht. 87 - Is Old Spring House Road being realigned or modified?

* Sht. 88 - See comments for Sht. 64

* Overall "T-9 Design Option" with adequate vertical clearances is the alignment that impacts existing and potential future highway improvements the least, while meeting railway over all objectives.

Thank you for providing this opportunity for VDOT to provide comments on this very important project. Please let me know if I could be of any further assistance.

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VDOT-NOVA Transportation Planning Section
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4.0 REGULATORY SETTING

This section describes the applicable statutes and regulations that govern air quality in the project study area at both the federal and state levels and describe the procedures necessary to demonstrate compliance.

4.1 STATUTES AND REGULATIONS AFFECTING AIR QUALITY

Public awareness of the effects of air pollution has increased noticeably in recent years. This concern resulted in the passage of the Federal Clean Air Act of 1970, as amended in 1977 and 1990. These statutes are the basis for most federal air pollution control programs. The Virginia State Implementation Plan (SIP), developed under the Clean Air Act, as amended, contains the major Commonwealth-level requirements with respect to the project.

The EPA under the Clean Air Act regulates air quality nationally. The EPA delegates authority to the Virginia Department of Environmental Quality (DEQ) for monitoring and enforcing air quality regulations in the Commonwealth of Virginia. DEQ is responsible for preparing the SIP and submitting it to EPA for approval. DEQ also works with local and regional agencies that have air quality responsibilities.

The study area is within the area covered by the Metropolitan Washington Council of Governments (MWCOG), which has air quality responsibilities related to transportation and air quality planning in the Washington Metropolitan Region. MWCOG develops the region's transportation and air quality strategies as well as specific programs to reduce emissions, and the strategies and programs developed become part of the Virginia SIP.

4.2 AMBIENT AIR QUALITY STANDARDS

Under the authority of the Clean Air Act, EPA established a set of National Ambient Air Quality Standards (NAAQS) for seven major "criteria" air pollutants (40 CFR 50). These pollutants are: CO, NO₂, O₃, PM₂.₅, PM₁₀, SO₂, and Pb. New NAAQS for O₃ and PM₂.₅ were passed into law on July 16, 1997 (Federal Register Notice July 18, 1997, effective date September 16, 1997).

The standards are intended to protect the public health and welfare. Primary NAAQS are established at levels intended to protect the public health, including sensitive population groups, with an adequate margin of safety. Secondary NAAQS are set at levels designed to protect the public welfare by accounting for the effects of air pollution on vegetation, soil, materials, and other aspects of the general welfare. States can develop ambient air quality standards provided that they are at least as stringent as the National standards. Table 4-1 presents the NAAQS and the Virginia Ambient Air Quality Standards (9 VAC 5, Chapter 30), which are identical.
Compliance with these standards must be achieved by any project to be constructed in the Commonwealth of Virginia.

TABLE 4-1: NATIONAL AND STATE AMBIENT AIR QUALITY STANDARDS

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Standard Type</th>
<th>Averaging Period</th>
<th>Standard Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Carbon Monoxide</td>
<td>Primary and Secondary</td>
<td>8-Hour average</td>
<td>9 ppm (10 mg/m³)³</td>
</tr>
<tr>
<td></td>
<td>Primary and Secondary</td>
<td>1-Hour average</td>
<td>35 ppm (40 mg/m³)²</td>
</tr>
<tr>
<td>Nitrogen Dioxide</td>
<td>Primary and Secondary</td>
<td>Annual arithmetic mean</td>
<td>0.053 ppm (100 µg/m³)²</td>
</tr>
<tr>
<td>Ozone</td>
<td>Primary and Secondary</td>
<td>1-Hour average</td>
<td>0.12 ppm (235 µg/m³)²</td>
</tr>
<tr>
<td>Respirable Particulates (PM10)</td>
<td>Primary and Secondary</td>
<td>Annual arithmetic mean</td>
<td>50 µg/m³³</td>
</tr>
<tr>
<td></td>
<td>Primary and Secondary</td>
<td>24-Hour average</td>
<td>150 µg/m³³</td>
</tr>
<tr>
<td>Lead (Pb)</td>
<td>Primary and Secondary</td>
<td>Quarterly mean</td>
<td>1.5 µg/m³³</td>
</tr>
<tr>
<td>Sulfur Dioxide (SO₂)</td>
<td>Primary</td>
<td>Annual arithmetic mean</td>
<td>(0.03 ppm) 80 µg/m³³</td>
</tr>
<tr>
<td></td>
<td>Primary</td>
<td>24-Hour average</td>
<td>(0.14 ppm) 365 µg/m³³</td>
</tr>
<tr>
<td></td>
<td>Secondary</td>
<td>3-Hour Average</td>
<td>(0.5 ppm) 1300 µg/m³³</td>
</tr>
</tbody>
</table>

NOTES:

a Short-term standards (1 to 24 hours) are not to be exceeded more than once per calendar year.

b Former national secondary standards for carbon monoxide have been repealed.

c ppm: parts per million.

d mg/m³: milligrams per cubic meter.

e µg/m³: micrograms per cubic meter.

f Maximum daily 1-hour average. The ozone standard is attained when the expected number of days with maximum hourly average concentrations above the value of the standard, averaged over a three-year period, is less than or equal to one.

g The PM10 standard is attained when the expected number of days with maximum hourly average concentrations above the value of the standard, averaged over a three-year period, is less than or equal to one.

h National standards are block averages rather than moving averages.


4.3 ATTAINMENT STATUS AND STATE IMPLEMENTATION PLAN REQUIREMENTS

In addition to the standards described above, the Clean Air Act specifies geographic areas of the country, which have measured pollutant concentrations that exceed the levels prescribed by the air quality standards (non-attainment areas). It classifies non-attainment areas and specifies compliance deadlines for these areas.

The project is located in Fairfax and Loudoun counties, which are located in the Metropolitan Washington, D.C.-MD-VA Non-attainment Area. EPA has classified this area as attainment for all pollutants except ground-level ozone. With respect to ozone, the EPA designated the Metropolitan Washington D.C.-MD-VA Non-attainment Area, including Fairfax and Loudoun counties, as a non-attainment area under the Clean Air Act. The ozone non-attainment area must demonstrate attainment with the ozone standards by 2005. EPA provided the region an extension of time to 2005, due to the effects of ozone transport.
In compliance with the mandates of the Clean Air Act, DEQ has developed a SIP for air pollution control. The SIP defines the process by which the ozone NAAQS will be attained, and defines control strategies and schedule that the Commonwealth will employ to reduce emissions in order to reach attainment. To comply with the SIP, a proposed project must not result in any new violations of the NAAQS or Virginia Ambient Air Quality Standards, must not exacerbate any existing violations, and must meet the conditions of the conformity regulations.

4.4 CONFORMITY WITH THE VIRGINIA SIP

Under the Clean Air Act, it is the responsibility of federal agencies, such as the FTA, to ensure that a proposed project conforms to the SIP. Because the study area is located in an ozone non-attainment area, a conformity determination is required under Section 176(c) of the Clean Air Act.

EPA has issued two separate regulations for demonstrating conformity of Federal actions in non-attainment areas to the SIP. These regulations are the Transportation Conformity Rule and the General Conformity Rule. The Transportation Conformity Rule (40 CFR Part 93 Subpart A) applies to all transit projects developed, funded, or approved by FTA under the Federal Transit Act, including the Dulles Corridor Rapid Transit Project. The Commonwealth of Virginia has established transportation conformity regulations (9 VAC 5 Chapter 150) that are similar to the Federal conformity rules.

The transportation conformity process applies to the Dulles Corridor Rapid Transit Project because FTA will fund the project. Under the Transportation Conformity Rule, if a project is not included in the area's Transportation Plan or Transportation Improvement Program (TIP), then emissions inventory (mesoscale or regional emissions burden) analysis must be performed to demonstrate conformity. The emissions inventory must demonstrate that the regional emissions with the Build Alternative conform. On the other hand, if a project is included in the area's Transportation Plan or TIP, and if FTA and EPA have approved this plan or program as conforming to the SIP, then the project is presumed to conform.

The Transportation Plan for the region is the Financially Constrained Long Range Plan (National Capital Region Transportation Planning Board, amended November 15, 2000) prepared by the MWCOG Transportation Planning Board. The Dulles Corridor Rapid Transit Project is included in the Financially Constrained Long Range Plan. Therefore, the project conforms to the SIP, subject to continued approval of the Constrained Long Range Plan by FTA and EPA and eventual full conclusion in an approved and conforming TIP. Near-term phases of the project are included in an approved conforming TIP (FY01). As the dates for implementation of the later phases of the project approach, they will be included in approved and conforming TIPs.

Currently, the Dulles Corridor Rapid Transit Project is included in the MWCOG CLRP and TIP. Therefore, because the project is part of the approved CLRP and the TIP for the entire region, there is no regulatory requirement to prepare a project-specific emissions inventory (i.e., project level conformity is assumed).
For the intersections and the park-and-ride facility analyses, CO concentrations were evaluated for the existing conditions in 2000, and the future conditions for the Baseline (or No-Build) Alternative and the four Build Alternatives. Because the project may be built in phases, the future conditions were analyzed with 2006 as the opening year for the BRT and BRT/Metrorail Alternatives; 2010 as the opening year for the full Metrorail Alternative; and 2025 as the project design year for all alternatives.

Although there may be concern about severe traffic congestion along major highways of the area, there are currently no federal or State regulations or requirements to analyze the CO concentration along highway mainlines. Furthermore, the adverse levels of CO due to traffic on highway mainlines are very unlikely to occur for two reasons: (1) recent model year vehicles have relatively low emission rates and (2) the rapid drop off of CO concentrations due to the large distances between the travel lanes and receptors located beyond the highway right-of-way. For these reasons, EPA and DEQ do not require assessment of CO concentrations from highway mainlines.

5.1.1 Analysis Methods

The analysis methodology consists of an intersection assessment and a dispersion modeling analysis for computing CO concentrations at candidate intersections along the corridor.

Intersection Screening

Motor vehicles emit CO at the highest rates when they are operating at low speeds or idling in queues. For this reason, the potential for adverse air quality impacts is greatest at intersections where traffic is most congested. EPA has specified criteria (U.S. EPA-454/R-92-005, Guideline for Modeling Carbon Monoxide From Roadway Intersections, November 1992) based on traffic level of service (LOS) and volume for screening the intersections in the study area and selecting intersections for detailed air quality analysis. Level of service is a measure of the performance of the intersection in processing the volume of vehicles attempting to pass through it. Level of service is expressed as a letter rating based on the amount of overall delay at the intersection, where LOS A is best and LOS F worst. The EPA's LOS criterion states that intersections that currently operate at LOS D or worse, or would operate at LOS D or worse under future conditions, should be considered for air quality analysis. In applying the EPA screening procedure to the project, the candidate-signalized intersections in the traffic study area were ranked by LOS and by total volume in accordance with the guidelines. The intersections with the worst LOS and those with the highest volumes, or a combination of the two, were selected for detailed air quality analysis.

Based on the results of the intersection screening analysis, 15 sites listed in Table 5-2 were selected for analysis. Figure 5-2 illustrates the locations of these sites.

In addition to the intersection analysis, a typical park-and-ride facility was modeled to assess the potential air quality impacts of such facilities. The Route 606 Park-and-Ride Facility was selected as a worst-case representative because it is the largest planned park-and-ride facility, and experiences a high ratio of demand to capacity. The Route 606 facility is likely to experience a high degree of traffic congestion and, consequently, high CO concentration levels. The park-and-ride analysis also includes the adjacent intersections of Route 789/Lockridge Road with the Park-and-Ride Entrance Road and the Park-and-Ride Exit Road. These two additional sites are also listed in Table 5-2.
eliminate impacts in the areas above the tunnel and station, but would increase the potential for localized impacts at the tunnel portals and station access shafts where equipment must enter and excavate must be removed. Alignment T1 includes the tunnel section but only three stations, and accordingly, would be expected to have generally less potential impact than the other alignments.

Construction of the Phased Implementation Alternative would involve the implementation of BRT and Metrorail over an extended period of time. Although the construction effects would be the same as those described above for the other three alternatives, the timing would be different. The effects of constructing Metrorail through Tysons Corner would add to the effects of constructing BRT between the Orange Line and Loudoun County. These effects would then be followed by the effects of constructing Metrorail from Tysons Corner to the end of the study area in Loudoun County. Small increases in fugitive dust and emissions from construction equipment would occur as a result of Phased Implementation over what is described above. This would occur as a result of the demolition of the Spring Hill Road Station, the BRT ramps between the Tysons West Station, and extension of the construction period that would occur during phased implementation.

On a corridor-wide basis the potential air quality impacts due to construction of the BRT Alternative would be least, the impacts from construction of the BRT/Metrorail Alternative would be greater, and those of the Metrorail Alternative and the Phased Implementation Alternative would be largest. For the rail alternatives in Tysons Corner, the expected potential impacts would be least with Alignment T1, somewhat greater with Alignments T6 and T9, and greatest with Alignment T4.

5.3 CONSTRUCTION MITIGATION

Direct emissions from construction equipment would not be expected to produce adverse effects on local air quality provided that all equipment is properly operated and maintained. Appropriate mitigation could consist of assurance of proper operation and maintenance, specification of low-emissions equipment (EPA Tier 2 compliant, alternative-fueled, or retrofit with emissions controls), and prohibition of excessive idling of engines.

Traffic management techniques are available during the construction period that could mitigate increased emissions from traffic congestion due to lane closures, detours, and construction vehicles accessing sites. Examples of these techniques include development of site-specific traffic management plans; temporary signage and other traffic controls; designated staging areas, worker parking lots (with shuttle bus service if necessary), and truck routes; and prohibition of construction vehicle travel during peak traffic periods.

Potential fugitive dust impacts can be mitigated through good "housekeeping" practices such as water sprays during demolition; wetting, paving, landscaping, or chemically treating exposed earth areas; covering dust-producing materials during transport; limiting dust-producing construction activities during high wind conditions; and providing street sweeping and tire washes for trucks leaving the site. Such practices during construction would meet VDEQ regulations for fugitive dust and emissions as outlined in VDEQ regulation 9 VAC 5-30-90.

Predicted CO Concentrations: Intersections

The air quality modeling analysis for the BRT/Metrorail Alternative was conducted in the same way as for the Baseline and BRT Alternatives. The project team determined that Tysons Corner
6.0 CONCLUSIONS

As shown in Tables 5-5 to 5-10, carbon monoxide concentrations do not vary appreciably between the BRT, Metrorail, BRT/Metrorail, Phased Implementation alternatives, nor will they vary from the Phased Implementation Alternative, indicating a fairly equal diversion of vehicles into transit under each of the selected alternatives.

The project is not predicted to cause or exacerbate a violation of the applicable NAAQS, and with respect to regional emissions and conformity, the project has been shown to conform to the SIP. No mitigation measures are necessary with respect to compliance with the transportation conformity requirements.

Construction activities have potential to produce short-term, localized air quality impacts. These potential impacts can be minimized with appropriate mitigation measures.
Mr. Leonard Alfredson, PE  
Washington Metropolitan Area Transit Authority Project Manager  
Dulles Corridor Rapid Transit Project  
1550 Wilson Blvd., Suite 300  
Arlington, Virginia 22209

Subject: Dulles Corridor Rapid Transit Project – PE/NEPA Agency Scoping Comments

Dear Mr. Alfredson,

As the Federal Transit Administration (FTA), Virginia Department of Rail and Public Transportation (VDRPT) and Washington Metropolitan Area Transit Authority (WMATA) are preparing an Environmental Impact Statement (EIS) for the multi-phased Dulles Corridor Rapid Transit Project (DCRTP), Virginia Department of Transportation (VDOT) looks forward to a very successful and well coordinated effort on this very exciting project. We acknowledge and fully support the Governor’s and the Secretary of Transportation’s identification of this project as one of the high priority projects for the region.

Per your request, VDOT offers the following input and comments, and requests your incorporation of these issues in the scope of work for the EIS:

- The DCRTP should include the following roadway improvement projects currently programmed by VDOT:

1. Widening of Route 7 to 6 lanes, from:  
   - Reston Parkway to Dulles Toll Road (DTR) (including the interchange at Route 7 & DTR), currently planned to coincide with the schedule above; however, this segment is only funded through the preliminary engineering phase at this time.

2. Reconstruction of the DTR interchange at Hunter Mill Road, which will also consider ancillary improvements to Hunter Mill Road and Sunset Hills Road necessary to increase operational efficiency of the interchange. A location public hearing is currently scheduled for Spring of 2001 for Phase I, which will result in identification of construction improvements for the mid and long terms.
3. Realignment of Hunter Mill Road from Hunter Station Road to Sunrise Valley Drive (on proffered right of way) is currently scheduled for a location public hearing in the Winter of 2002, with construction advertisement scheduled for Summer of 2003.

4. Construction advertisement of additional toll collection capacity on the westbound DTR ramp at Spring Hill Road is scheduled for Spring 2001.

5. Implementation of an open toll plaza configuration for the two adjacent “Smart Tag only” lanes at the DTR’s Main Toll Plaza (both directions) is scheduled for Fall of 2000.

6. Widening of Route 123 to 6 lanes from I-495 to DTR is currently in the final design phase with construction advertisement scheduled for December 2000. This project is managed by Fairfax County under an agreement with VDOT.

- The Fairfax County Department of Public Works and Environmental Services is currently developing design plans for replacement and additional bus-only slip ramps between the DTR and Dulles Airport Access Road (DAAR). The DCRTP should also include these improvements.

- According to the Fairfax County Comprehensive Plan and the current 1999 regionally adopted Constrained Long Range Plan (CLRIP) (interchanges not specifically identified) the following improvements are planned by 2010. These planned improvements must be considered and evaluated during this phase of DCRTP:

1. Widen Route 7 to 8 lanes from DTR to I-495
2. Widen Route 7 to 6 lanes from the Fairfax Co. Parkway to DTR (this will necessitate reconstruction of the DTR Interchange)
3. Widen Route 123 to 8 lanes from Route 7 to I-495
4. Widen Route 123 to 6 lanes from I-495 to Great Falls Road (segment between I-495 and DTR is funded and currently underway, see #6 above)
5. Interchanges @:
   • Route 123 & International Drive
   • Route 7 & International Drive
   • Route 7 & Westpark Drive
   • Interchange modification at Route 123 & Route 7
6. Widen DAAR to 6 lanes
7. Capital Beltway study (may result in I-495 reconfiguration of its interchanges with DTR and Routes 7 & 123) currently underway

Currently under review, the year 2000 CLRIP is anticipated to be adopted by Fall of this year. Upon adoption of the Plan, the year 2000 inputs should be used for the PE/NEPA process for the DCRTP.

As agreed upon at the July 11, 2000 pre-scoping meeting, the PE/NEPA process for the Dulles Corridor Rapid Transit Project will develop concept and design plans at 30% for these projects. The design of the highway improvements will be carried to the same level of design as the rail project at this stage, so that potential conflicts among all the transportation elements will be avoided. To that end, we recommend that WMATA initiate working technical meetings with VDOT and FDOT during the
NEPA/PE phase to address technical issues, and particularly, the co-location of the rail alignment with future roadway improvements in Tysons Corner.

- Per the July 11th pre-scoping meeting discussions, the PE/NEPA process will continue the effort to define system requirements for the proposed technology concepts (as described in the adopted "Dulles Corridor Rapid Transit Project Technology Implementation Plan"). It is critical to further define technology tasks in various phases and to assimilate the outcome into the project design. The refinement of the technology could be undertaken by the existing Technology Task Group and/or an ITS design consultant.

- Presently, VDOT and Fairfax County Staffs have been closely working with elected officials and citizen representatives from the Tysons and Reston Communities per House Joint Resolution 276 (House Document No. 23 – Tysons Corner Interim Transportation Improvements), General Assembly of Virginia, 1999; and Senate Joint Resolution 335/ House Joint Resolution 335 (Senate Document No. 35 – Transportation Improvements for the Reston Area), General Assembly of Virginia, 2000. The Town of Herndon has recently initiated consultant procurement to complete concept design, traffic analysis and engineering feasibility for the provision of pedestrian and vehicular access from Herndon to the planned BRT and rail station at the Herndon/Monroe park & ride facility. We recommend that pedestrian circulation, as well as other recommendations identified as part of these three efforts, be incorporated into the PE/NEPA process at this early stage.

- The 2020 Plan, adopted by the Northern Virginia Transportation Coordinating Council, provides the overall vision guiding transportation improvements over the next 20 years. The Plan will serve as a useful resource for the Dulles Corridor Rapid Transit Project during the PE/NEPA phase.

Finally, we recommend that the technical staff currently working on parallel tracks on several subjects work together to facilitate a balanced multi-modal transportation system. These subject areas are: Land Use Density, Travel Forecast, Highway Design, Rail Stations /Alignment, and Pedestrian Circulation. This is the appropriate time for the technical staff currently working on these separate areas to share and test ideas in a coordinated manner.

Thank you for providing this opportunity for VDOT to comment on this very important project. As in the past, my staff and I will be available to provide technical assistance or to help clarify any issues.

Sincerely,

[Signature]

Thomas F. Farley

cc: Mr. Arthur Bowen – Deputy Secretary of Transportation
    Mr. Kenneth Klinge – Chairman of Dulles Corridor Task Force, CTB Member
    Mr. Leo Bevon – Virginia Department of Rail & Public Transportation
Falls Church Transportation Plan

Mr. Hector A. Rivera
City Manager
Harry E. Wells Building
300 Park Avenue
Falls Church, Virginia 22046-3332

Dear Mr. Rivera:

Thank you for your review of the suggested scope of work for the local transportation plan and the task oriented development for a small urban area.

We have asked the Transportation Planning Division to review the City's comments and recommendations for inclusion in the scope of work to address your particular concerns. Also, we have requested they provide an estimate of the cost for a transportation study of this size and nature so possible funding sources may be investigated.

With these issues and task underway, it will take about 30 days to complete. I would suggest your meeting with the Secretary, District Administrator and yourself be postponed until the middle of August so sufficient information may be available to discuss possible funding sources.

Sincerely,

Reginald H. Beasley, Jr.
Urban Programs Engineer

RHBjr/aas
cc: Mr. Wayne J. French
    Mr. Thomas A. Farley
    Mr. Grady E. Ketron
Mr. Willie Best, Acting City Manager  
City of Falls Church  
300 Park Avenue  
Falls Church, VA 22046-3332

Subject: Falls Church Comprehensive Traffic Management Study Plan

Dear Mr. Best:

Last month you, Otis Smith, and I met to review the status of discussions between the city and VDOT on a comprehensive traffic management study plan for the city of Falls Church.

The city continues to hope VDOT will underwrite a comprehensive study with some “VDOT grant-based” funding. VDOT continues to offer existing data and technical advice on development of the city’s scope-of-work.

At the city’s request, VDOT’s Transportation Planning Division developed a conceptual scope-of-work for the city to tailor to their needs. A rough cost estimate indicated $1.35 million. In a letter of August 5th, Reginald Beasley of VDOT’s Urban Division indicated “…the Department has limited resources in both staffing and funding to pursue a study of this magnitude.”

When we met in November, we discussed ways to trim the overall costs by having city and VDOT staff undertake some of the tasks in the city’s June 25, 1999 scope-of-work letter to Reggie Beasley (from Hector Rivera, City Manager). I have copied and numbered the list below:

1. A comprehensive inventory and assessment of existing transportation facilities, parking facilities, and traffic conditions in the city – vehicular and non-vehicular (pedestrian, bicycle, and mass transit). This should also note deficiencies.
2. A review of the existing transportation systems in Arlington and Fairfax counties and previously developed regional transportation plans.
3. A forecast of traffic, travel, and parking demand as result of (a) the BRT, (2) future rail links to metro, (3) future anticipated development within and near the city, (4) the above scenarios if HOV does not exist on I-66, and (5) the above scenario if HOV begins at Route 29 instead of the Beltway.

4. An identification of future transportation needs and deficiencies.

5. An assessment of the projected impacts on special needs populations, in particular the elderly and physically disabled.

6. A comprehensive and workable Transportation Management Plan that includes alternatives for state of the art traffic-calming techniques as well as for each mode of transportation and commensurate parking resources. This plan must meet the goal and objectives as stated.

7. A model that demonstrates this plan.

8. An implementation plan.

9. Public information made available for the city’s web page.

You indicated that city staff could undertake numbers 1, 5, 8, and 9. I indicated VDOT could provide information on existing systems from the draft 2020 plan for number 2 and the 2020 model and assumptions for number 3 [(subtasks (“a”), (“2”), and (“3”)]. Future transportation needs (number 4) at the broad-brush level are available from the draft 2020 plan and that information could also be provided.

We decided that neither the city nor VDOT staff could undertake the city level specific details from 2, 3, and 4 and all of numbers 6 and 7. Numbers 6 and 7 require a transportation consultant to pull all the information together, analyze the data, and develop a plan and model.

I spoke last week with Ken Lantz, Division Administrator for VDOT’s Transportation Planning Division in the Central Office. He suggested the city apply to FHWA for the Transportation and Community System Preservation Pilot. The program is “…a comprehensive initiative of research and grants to investigate the relationships between transportation and community and system preservation and private section-based initiatives.” I’ve attached a copy of the Tea-21 brochure page describing the program. I’ve also included a reference out of ITE Washington Weekly for this FHWA program.

Another source of information we discussed when we met was the environmental document under National Environmental Policy Act (NEPA) for the Dulles Corridor Transportation Study. The supplement to the earlier Dulles Corridor Transportation Study was recently released and the NEPA document is one of the next steps.

As stated in the city manager’s letter of June 25th, the Dulles projects, with their connections to the East and West Falls Church Metro stations, will significantly compound the city’s existing problems. The impacts of the BRT and rail project on the metro stations and adjacent neighborhoods should be an important part of the environmental document. The data and analysis of the impacts and the development of mitigation measures should contribute to needed
information for the city's transportation plan. I suggest you speak with Mr. Leo Bevon, Director of VDRPT, the state agency leading the Dulles initiatives, about the environmental document and opportunities to work with the consultant team.

Some of the city's concerns rest with cut through traffic, speeding, and parking. Traffic calming studies are usually conducted at the local level with extensive community involvement and with advice from VDOT's Traffic Engineering staff. There are two high profile traffic calming studies in Northern Virginia: the Highway 50 Traffic Calming Study funded under federal TEA-21 and Georgetown Pike traffic calming which came out of 1999 state legislation as a study, but with no appropriation. Ilona Kastenhofer, the new VDOT Traffic Engineer, is chairperson of VDOT's traffic calming committee and is a participant in both of these studies. She can be reached at (804) 786-2965.

The City of Falls Church has a number of transportation and land use challenges ahead. VDOT will support the city where we can with data and technical advice. We do not have grants to fund developing a citywide comprehensive transportation/traffic calming/redevelopment plan as envisioned by former city manager Mr. Rivera. I understand Mr. Rivera hoped that Secretary Ybarra would be able to help the city secure funding for the comprehensive study. I suggest you explore the options I have outlined above and then return to Secretary Ybarra to address the funding question. Perhaps she would have additional options to suggest. As you progress with the development of your study, please let me know if the Transportation Planning Section and/or the Northern Virginia District can be of assistance.

Sincerely,

[Signature]

Jo Anne Sorenson
Assistant District Engineer for Planning and Development

Enclosures

cc: Leo Bevon
    Ken Lantz
    Reginald H. Beasley
    Bob McDonald
K.3.9 Commonwealth of Virginia, Marine Resources Commission

- October 28, 2002
All work to be performed in, over or under, waters within the Commonwealth of Virginia, require the submission of a Joint Permit Application (JPA) to the Virginia Marine Resources Commission (VMRC). VMRC would then act as the clearing house, distributing copies of the application to state, local and federal agencies for review and comments.

Detailed engineered plans showing the exact location of all water crossings will be required to determine whether or not a permit will be required from the Marine Resources Commission.

The review and permitting process normally requires a minimum of 90 days, so it is advised to contact this agency as soon as final plans are complete, to allow ample time for public notice and permitting.

Copies of the JPA are available on the internet, or by contacting this office.

Mark Eversole
Environmental Engineer
Virginia Marine Resources Commission
2600 Washington Avenue
Newport News, Virginia 23607
757-247-8063
757-247-8062 Fax
K.4 COUNTY
K.4.1 County of Fairfax, Board of Supervisors

- December 17, 2003
- December 16, 2003
- Verbal Testimony at 12/2003 Public Hearings (Ms. Kathy Hudgins)
- Verbal Testimony at 12/2003 Public Hearings (Mr. Gerald E. Connolly)
- August 28, 2002
- August 16, 2002
- August 13, 2002
- August 2, 2002
December 17, 2003

The Honorable Whittington W. Clement
Secretary of Transportation
Ninth Street Office Building
202 North 9th Street
Richmond, Virginia 23219

Dear Secretary Clement:

At its meeting of December 8, 2003, the Fairfax County Board of Supervisors affirmed its endorsement of the revised Locally Preferred Alternative (LPA) for the Dulles Corridor Rapid Transit Project. The Board recognizes that constructing Phase I of this rail extension represents the essential first step to constructing the full LPA to Dulles Airport and Route 772 in Loudoun County. While we understand that the Federal Transit Administration will be considering funding Phase I of the Project, the Board also recognizes that as the financial plan continues to be refined, other phasing, timing and financing options may have to be evaluated and pursued. The Board supports such efforts that will help in advancing this project to final design and construction. The Board also urges that the Commonwealth work closely with WMATA to explore other options for accelerating the engineering work on this project. Therefore, we encourage and support the Virginia Department of Rail and Public Transportation’s efforts to conduct preliminary engineering for the entire project.

The Board has the following comments regarding the Supplemental Draft Environmental Impact Statement:

1. The Board requests that construction of the parking structure at the Wiehle Avenue Station not commence until the Full Funding Grant Agreement for Phase II is executed. However, deferring such construction should not preclude land acquisition and station access improvements at this station.

2. Pedestrian access to all stations needs greater attention from the Project Team. Station plans should clearly show pedestrian access points and necessary adjacent facility improvements such as cross walks and sidewalks/trails. Station plans should clearly show pedestrian access points and necessary adjacent facility improvements such as cross walks and sidewalks/trails. Alternate points of access to the Tysons West and
Tysons Route 7 Stations should be evaluated. Staff is collaborating with a subcommittee of the County Non-Motorized Transportation Committee to identify pedestrian facility improvements that should be constructed between now and the initiation of rail service.

- The traffic mitigation measures identified in the SDEIS should be programmed by the Virginia Department of Transportation at the earliest possible date so that they are constructed before the rail system begins operation.

- At the Tysons West Station, consideration should be given to locating the parking facility and pedestrian access on the south side of Tyco Road. Locating the parking structure on the south side of Tyco Road may be more favorable to joint development. Locating pedestrian access on the south side of Tyco Road may serve a greater number of pedestrians.

- The County requests technical back-up information quantifying the benefits of the noise mitigation measures proposed for the West Falls Church S & I Yard and the efficacy of the noise mitigation measures for aerial sections of track.

- Facilities associated with the Tysons East Station are impacted by a Resource Protection Area (RPA) and an Environmental Quality Corridor (EQC). Several proposed stormwater management facilities at other sites are, or may be, in “new” RPAs as adopted by the Board on July 7, 2003. Coordination with County staff is necessary to ensure that these issues are addressed appropriately.

- The County requests further information regarding proposed stormwater management measures for several of the station facilities (Wiehle Avenue; Tysons West; and Tysons East), as no such measures are identified on the proposed general plans for these facilities. Stormwater management and best management practice measures should, at a minimum, be consistent with County requirements.

As you know, the Express Bus System in the Corridor, operated by the County with support from VDRPT, has been immensely successful. Until rail is operating, the County needs VDRPT’s continued support to maintain and enhance this service. The LPA included incorporating elements of Bus Rapid Transit into the existing bus operation. In reality, existing express bus service already is Bus Rapid Transit in many respects. However, adding additional BRT elements
between now and the opening of Phase I rail would enhance the system consistent with the LPA selection and would continue to build ridership for rail.

The Board considers the Metrorail extension through Tysons Corner to Dulles Airport and Loudoun County to be of the highest priority. We commend the Commonwealth and the Project Team on its progress and commitment, and we pledge to continue our partnership with you to move this key project forward as expeditiously as possible.

Sincerely,

[Signature]
Katherine K. Hanley

KHH/lmc

cc: Members, Board of Supervisors
    I. Kenneth Klinge, Commonwealth Transportation Board
    Kirby Bowers, County Executive, Loudoun County
    Steve Owen, Town Manager, Herndon
    Richard A. White, General Manager, WMATA
    James E. Bennett, President, MWAA
    John Ditmeier, Acting Project Manager, WMATA
    Karen Rae, Director, Virginia Department of Rail and Public Transportation
    Corey Hill, Virginia Department of Rail and Public Transportation
    Karl Rohrer, Virginia Department of Rail and Public Transportation
    Anthony H. Griffin, County Executive
    Young Ho Chang, Director, Department of Transportation
    James P. Zook, Director, Department of Planning and Zoning
    Transportation Advisory Commission, Fairfax County
December 16, 2003

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Secretary of Transportation
Ninth Street Office Building
202 North 9th Street
Richmond, Virginia 23219

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Sincerely,

Katherine K. Hanley

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Anthony H. Griffin, County Executive
Young Ho Chang, Director, Department of Transportation
James P. Zook, Director, Department of Planning and Zoning
Transportation Advisory Commission, Fairfax County
MR. KLINGE: I am sure that many of you here tonight are anxious to provide us with your comments, concerns and suggestions. As explained at the beginning of the meeting, we will hear from people who registered in advance first followed by those registered tonight. If you have not signed up yet, please see Mr. Fairfax McCandlish at the registration desk at this time so that we can accommodate you.

If you wish to provide comments and do not wish to speak tonight at tonight's hearings, I encourage you to fill out a comment form, write us a letter or send us an e-mail. We will be accepting comments until the public-comment period closes at 5:00 p.m. on December 20, 2003.

Now I shall introduce the public officials here present to testify. The first is Supervisor Kathy Hudgins.

MS. HUDGINS: Good evening. I am Supervisor Kathy Hudgins of the Hunter Mill District. I am here, first of all, to welcome you to the Hunter Mill District. I want to make note
that this Supplemental Draft EIS is reflective of representing nearly all of the Hunter Mill District. I want to make note that the District and the two stations starting at Tysons Corner between 123 and Route 7 and the toll road are part of Hunter Mill District and the remaining stations that are part of the Fairfax County and Guelles Corridor Are part of the Hunter Mill District.

I note that however the area to be served by this project is a very critical area to Hunter Mill District. As you will hear testimony tonight, I hope that you will keep in mind the growth in this District, the traffic congestion that we face and the critical importance of solving those problems.

The Board of Supervisors approved the local preferred alternative last year for the full project. I believe, as we look at the Supplemental Draft EIS, the testimony that was heard at that time will reflect that as well as support for rail in the Corridor.

I know that we will hear some concerns
about it, but I think that, as we address those concerns, I hope that we will be able to complete our commitment that we made when we supported the local preferred alternative in the Corridor.

I would like to a moment, in that you have indicated that public officials have ten minutes; the Reston Association is a homeowner association of over 50,000 people. Susie Jones is here to testify for us and I would hope that you could be able to incorporate as much time as possible for her to provide her testimony.

Thank you very much.

MS. HANLEY: Thank you.

MR. KLINGE: Thank you. Next is Delegate Ken Plum.

MR. PLUM: Thank you very much and good evening. My name is Kenneth Plum. I welcome you to my neighborhood. I live two blocks down the street at 2073 Cobblestone Lane, Reston. I speak to you tonight as a member of the Virginia House of Delegates representing the 36th District but I also speak as Chairman of the Dulles Corridor Rail
MR. CONNOLLEY: Thank you, Madame Chairman, and thank you all for being here and for having this public hearing. I support the Metrorail alternative and have voted for the local preferred alternative and I believe that a number of the refinements contained in the Supplemental Draft EIS reflect a number of the concerns that both the public and a number of local elected officials had.

This Corridor, as you have heard tonight, is going to be the second largest employment center in the region next only to Washington, D.C., itself. The idea that the second-largest employment center in the region, one of the most vibrant regions in the United States, would not be served by rail is, to me, something we don’t want to contemplate.

We have replanned much of the land in the Corridor in advance of rail. Tysons was replanned in 1994. Merryfield was replanned a couple of years ago. The Dulles Corridor, including Reston and Herndon, were replanned about a year and a half
ago in anticipation of rail.

Rail has, as was pointed out in the study, the largest capacity. While bus rapid transit may serve on an interim basis in parts of the Corridor, it won't work in Tysons because it competes with the same congestion the rest of us do. And, at the end of the day, it only has about a third of the capacity of rail.

One might note that one of the places frequently cited and traveled to to study bus rapid transit and the efficacy of bus rapid transit is Curitiba, Brazil, had recently issued an RFP for guess what? Rail, because it has run out of capacity.

I think the experience of our region is if you build it, they will use it. When it comes to mass transit, one of the critical pieces that we don't yet have in this region in sufficient quantity is choices for people. Give us choices. In all too many instances, the only choice most of us have is to get in our automobile to go from Point A to Point B, whether it be to commute to
work or whether it be other kinds of travel, taking the kids to soccer or going to church or synagogue or temple or whatever it may be.

I believe one of the critical pieces of rail is providing a key choice in a key corridor that could move 86,000 people a day.

Now, the other thing one is struck by in listening to much of the testimony, especially the critical testimony and many of the folks make points about this concern or that concern. But, you know, at the end of the day, it is awfully hard to get anything in this region in transportation. If you want, there must be at least 3 billion problems and reasons why you shouldn’t go forward with a project like this.

I think leadership is about leading. At some point, we have to decide this is the right thing for our region, this is certainly the right thing for our community. Is it perfect? Not much in life is. Does it have some problems and flaws? Undoubtedly, it does. But is there a better alternative? In my mind, no; there isn’t. Can we
afford the continue to dither and delay and find fault and reason not to proceed? I don't believe so.

The time is now. We have to move forward with this project. I just won an election saying that rail to and through Tysons on the way to Dulles is my top transportation priority and I promise you, over the next four years, it is going to be the top transportation priority of Fairfax County.

Thank you so much for having this hearing and thank you for hearing me tonight.

MS. HANLEY: Thank you. And thanks to all of you that have helped us put this on tonight and thanks all of you for coming. We are adjourned.

(Whereupon, at 5:45 p.m., the meeting was adjourned)
This shall serve as Hunter Mill Supervisor Cathy Hudgins' official public statement on the DEIS for the Dulles Corridor Rapid Transit Project.

Thank you.

<<DEIS Public Hearing.doc>>
The first phase of a transit system in the Dulles Corridor was initiated in 1968 when Reston citizens established the Reston Commuter Bus System. This customized service was an immediate success for the community and received national recognition. In an attempt to keep pace with increased growth and to meet the needs of a more transit-oriented developed community, the system continued to grow and was later absorbed into the Washington Metropolitan Area Transit Authority and now the Fairfax County Connector Service.

Thirty-four years later, the corridor has the opportunity to complete the original Dulles Corridor transit system. When completed, the system should receive equal praise as the first phase and be as successful as the planned community of Reston it serves. Most importantly, a Dulles Corridor Rapid Transit Project (DCRTP) should provide a world class, comprehensive transit system, which will allow the Dulles Corridor and its surrounding communities to contribute to the ease of transportation in the capitol region. In addition, the project will connect Dulles Corridor to Dulles International
Airport, which is vital to the continued growth and development of the region.

In the last several decades, the Reston community, including residents and businesses east and west, have been actively engaged in studies, task forces and land use planning in preparation for rail. In May 2001, the Fairfax County Board of Supervisors approved changes to the Comprehensive Plan to allow for transit oriented development around the station areas. In March 2002, over 185 members from the community participated in a Charrette to explore how best to reflect the community’s desires in developing the land areas for the Wiehle Avenue and Reston Parkway stations. Following the Charrette, I appointed a group of citizens to review and provide recommendations on the Draft Environmental Impact Statement. Included in this statement are those citizens’ recommendations.

The Mid-Corridor of the DCRTP consists largely of Hunter Mill District, from Tysons Corner to Dulles International Airport. This area comprises over 120,000 residents, 12 million square feet of office space and six of the nine proposed rail station locations. Today, many of these residents, employers and employees face inconvenience, diminished quality of life and
the risk of economic stability as they await relief from congestion in their communities. While there are concerns that must still be addressed in the Final EIS, it is now time for federal, state and local officials to respond to the transportation needs of this community by supporting the DCRTP.

The summer of 2002 has been one of the worst in terms of air quality as measured by Code Red days for the region. It is time to cease debate and studies. The matter of relieving congestion and addressing the severe damage to the region's air quality requires that we act now. This project is long overdue. It is time to build rail in the Dulles Corridor, now.

As Hunter Mill District Supervisor, the following not only reflects my view but is also input gathered from numerous community venues. In general, there is as a consensus of support for rail now as the Local Preferred Alternative. While there are those that fear that the outcome of rail may be detrimental to the community, I believe that the rail alternative over the BRT or No Build alternatives is critical to maintaining the quality of life and the economic stability of the surrounding communities in the Dulles Corridor.

The following represents some specific concerns while supportive of the project.
➢ Support full Metrorail as the Locally Preferred Alternative

➢ Implement the Metrorail alternative as soon as legally and financially feasible, with strong consideration to provide immediate service through the Corridor to Dulles Airport, given it is the most cost-effective option to best serve Hunter Mill residents and businesses.

➢ Immediately begin to implement additional enhancements to the rapid express bus service in the Corridor as interim service prior to Metrorail.

➢ Respond to neighborhood noise concerns by including noise walls or other mitigation for Polo Fields, Westwood Village and Chatam Fords communities

➢ Urge Virginia Department of Public Rail and Transportation to remove from the financial analysis the increase tolls, at least until the construction of the earliest phase of the project

➢ Provide increased pedestrian/cycle access to the transit stations of Wiehle Avenue, Reston Parkway and Tysons Corner and particularly as a means of allowing for reconnecting the north-south Reston communities.

➢ Mitigate visual impact of the construction of Dulles Corridor Rapid Transit Project by incorporating innovative design features, enhanced lighting, public art and green space.
➢ Provide safety and security to the community and the rail system by delineating law enforcement roles and through early implementation of rail to provide needed transportation capacity in the corridor for emergency or disaster events

➢ Maintain implementation options for rail that do not preclude addressing the issues of air rights.

Rail in the Dulles Corridor will change the community. I urge that you consider the views expressed here in order to assure that the arrival of the Dulles Corridor Rapid Transit Project will provide change that will greatly enhance the quality of life for the residents and businesses of the corridor for years to come.
August 16, 2002

Mr. Corey Hill, Northern Virginia Rail Manager
Virginia Department of Rail and Public Transportation
3900 Jermantown Road Suite 300
Fairfax, VA 22030

Dear Mr. Hill,

I am writing to raise concerns that I have regarding the designs of the future rail stations in Tysons Corner. I understand that when Metro is extended to and through Tysons Corner there will be a need for commuter parking. In the interim, before metro is extended from Tysons to Dulles, there will also be a need for a terminus station with ample parking. While I support parking facilities at Tysons's West I am deeply concerned that the existing DPRT / WMATA design proposal for the interim terminus station in Tysons Corner, that includes a 2,000 space parking garage on Leesburg Pike, would catastrophically effect traffic flow on Route 7 resulting in gridlock affecting most of Tysons Corner.

I strongly encourage and would fully support DPRT / WMATA to think outside the box by seriously looking at alternative design opportunities to integrate ample parking for metro with mixed-use development on and around this future metro station. To achieve that end, I encourage DPRT / WAMATA to work with the development community to explore creative ways to fully take advantage of all the opportunities that future rail stations would provide. The public investment in the extension of Metro is too great to ignore opportunities to maximize that investment.

It would be a tragic lost opportunity if we do not innovatively attempt to coordinate and integrate land use with the extension of metro to Tysons Corner. By partnering with all stakeholders we have an opportunity to preserve and improve the existing success of Tysons Corner resulting in the improvement of traffic circulation and creating pedestrian friendly civic space where none now exists. I look forward to working with DPRT / WMATA, the development community and citizens to create a more effective transportation system in Tyson's Corner.

Sincerely,

[Signature]

Gerald E. Connolly
Providence District Supervisor

mgw/GEC
August 13, 2002

Mr. Corey Hill
Northern Virginia Rail Manager
Virginia Department of Rail and Public Transportation
1550 Wilson Boulevard
Arlington, Virginia 22209

Dear Mr. Hill:

Please enter the following comments into the official public record for the Dulles Corridor Rapid Transit Project Draft Environmental Impact Statement:

We stand at a pivotal moment in Fairfax County’s history. For the last twenty years, elected officials, government agencies, and the public have talked about extending rail through Tyson’s Corner to Dulles Airport. While that was taking place, Tyson’s Corner grew up: businesses flocked there creating 30 million square feet of office space and close to 100,000 jobs and more than 20 million people began visiting Tyson’s Corner Center and Tyson’s II annually. Tyson’s Corner grew to become a business district that, if it was its own city, would be larger (in terms of employment) than St. Louis or Miami. All of this success, however, has not come without a price.

Without mass transportation, all of these workers and visitors are forced to travel to Tyson’s Corner by car. Finally after years of talking, we have reached the point where decisive action is called for. We are ready to bring mass transit to Tyson’s Corner and the Dulles Corridor.

Integral to any public project of this size is an intelligent and practical funding plan. For Fairfax County, the funding pieces have come together in an unprecedented way; we are now uniquely positioned to capitalize on new, dedicated funding sources that will reduce or replace the County’s local contribution. The November transportation referendum includes $350 million specifically for the Dulles corridor transit project: its passage is critical for the success of the project. That funding coupled with the revenues from the proposed special tax district will fund most of the local share.

The current density and size of Tyson’s Corner justify the extension of rail now. Predicted growth in jobs and retail space only underscore the urgent need for mass transportation. Equally as important is growth in the number of residents in Tyson’s that has occurred and will continue to occur as Fairfax County encourages increased transit-
oriented residential development pursuant to the 1994 Comprehensive Plan. It is imperative that transportation be provided to serve these people.

The Draft Environmental Impact Statement has laid out several viable alternatives. Close attention must be paid to the potential impacts of each to surrounding developments, especially residential. The road network in Tyson’s Corner is at its limit. Important improvements can and will be made; however, the solution to Tyson’s Corner’s transportation problems is not in road expansion. And while there are some favorable characteristics of Bus Rapid Transit (BRT), there are clear advantages to rail: The capacity of rail is nearly four times that of buses and, under current proposals, no BRT stations would be located in the heart of Tyson’s Corner. Moreover, BRT has significant up-front costs and will not encourage the concentration of density at transit hubs, the way rail, with its built-in density triggers, will. Rail will contain sprawl by creating a magnet for clustered development around stations and will maximize convenience to those living, working, and shopping in Tyson’s. And, at a time when our region is struggling to meet EPA’s ground-level ozone attainment requirements, rail transportation will improve air quality by removing the most drivers from the road.

While bringing rail to Tyson’s Corner is my top priority, I believe it is imperative that transit ultimately be extended through the Dulles corridor to Dulles Airport. Washington, D.C. is one of the only capital cities in the industrialized world whose international airport is not served by rail. Demand for a rail link to Dulles will only increase as travel volume is expected to grow to nearly 32 million passengers by 2010. The opening of the new air and space museum next year is expected to attract millions more to the airport area. Furthermore, the closure of National Airport for months in the wake of September 11th is a compelling reminder of the reliance this region has on Dulles and the inconvenience of its missing rail link.

By 2020 Tyson’s Corner and the Dulles corridor will be the second largest employment center in the region (second only to downtown D.C.). If we fail to act and provide multi-modal transportation alternatives, growth in jobs and population can only make traffic congestion on our area roadways worse. We cannot afford to be a victim of our own success, we cannot let the high quality of life that attracts so many people and jobs to Fairfax County in the first place be undermined by traffic congestion. We are on the verge of making our long awaited vision of rail service to Tyson’s Corner and Dulles Airport a reality. The time to take bold steps to solve our transportation problems has arrived. Fairfax County and the Washington, D.C. region cannot afford to wait.

Sincerely,

Gerald E. Connolly
August 2, 2002

Corey Hill
Northern Virginia Rail Manager
Virginia Department of Rail and Public Transportation
1550 Wilson Boulevard
Arlington, Virginia 22209

Dear Mr. Hill:

At its meeting of July 22, 2002, the Fairfax County Board of Supervisors expressed several concerns about noise and traffic impacts of the Dulles Corridor Rapid Transit Project documented in the Draft Environmental Impact Statement. The Board requested a written response addressing these concerns and plans for appropriate mitigation efforts. Three specific concerns were identified and these are noted below.

1) The first concern is about the impact of 26 additional rail cars at the WMATA Service and Inspection Yard at the West Falls Church Metrorail Station on homes in the Lemon Road community. Rail cars entering and leaving the yard at late night and early morning hours are a source of increased noise, loud horns and squealing brakes. The project team has identified this impact, but has not specifically proposed any mitigation strategies.

2) The current noise abatement recommendations for properties near Hallcrest Heights include a three-foot tall parapet along the aerial rail sections next to residential areas. It is clear that this may be insufficient to reduce the noise generated by the meeting of rails and wheels on a curve.

3) Significant noise and traffic impacts may be caused by the proposed 2000 car parking structure on Route 7 at Tysons Corner. The current proposals do not address the noise impact that could reasonably be expected from increased traffic.

Sincerely,

Katherine K. Hanley

cc: Board of Supervisors
Young Ho Chang, Director, Department of Transportation
James P. Zook, Director, Department of Planning and Zoning
K.4.2 County of Fairfax, Department of Transportation

- December 19, 2003
- August 10, 2000
December 19, 2003

Mr. Karl Rohrer  
Project Manager  
Virginia Department of Rail and Public Transportation  
1550 Wilson Boulevard, Suite 300  
Arlington, Virginia 22209

Dear Mr. Rohrer:

The staff comments on the Supplemental Draft Environmental Impact Statement attached to this letter provides additional detail on the comments contained in the December 16, 2003 letter from County Board Chairman Kate Hanley. A few additional comments are editorial or technical. Staff from the County’s Department of Transportation and other County agencies look forward to continuing to work with VDRPT to complete the Environmental Impact Statement and to initiate preliminary engineering.

Sincerely,

[Signature]
Young Ho Chang, P.E.
Director

YHC/LW/lmc  
Attachment

cc: Robert A. Stalzer, Deputy County Executive  
     Jim Zook, Director, Department of Planning and Zoning
<table>
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<tr>
<td>Gen</td>
<td></td>
<td></td>
<td>Clarify which transportation improvements will be done as a part of the project, and which are “mitigation” that may be completed by others.</td>
</tr>
<tr>
<td>I</td>
<td>6-14</td>
<td>6.1.3.2</td>
<td>Table 6.1-4 – FCDOT commented on the DEIS that during peak periods, Connector bus service would have no greater than 30 minute headways.</td>
</tr>
<tr>
<td>I</td>
<td>6-17</td>
<td>6.2.2.1</td>
<td>Table 6.2-1 – Does this take into account the proposed parking garage addition?</td>
</tr>
<tr>
<td>I</td>
<td>6-19</td>
<td>6.2.2.3</td>
<td>Table 6.2-3 – Is it reasonable to expect that in 2025 for LPA I only, PNR trips will decrease? It seems that once garages fill up, they remain that way. Also, with the full LPA, bus trips appear to drop significantly. Is that reasonable to expect?</td>
</tr>
<tr>
<td>I</td>
<td>6-24</td>
<td>6.3.2</td>
<td>With Wiehle as the interim-terminal station, will there still be no additional effects on bicycle and pedestrian facilities with the LPA Phase I?</td>
</tr>
<tr>
<td>II</td>
<td>019</td>
<td></td>
<td>Tysons II development area may not be a realistic “contractor work area”, as it will probably be developed prior to or during rail construction. Also, the area shown on this map does not match that shown in the SDEIS, Env. Conditions Sheet 3.</td>
</tr>
<tr>
<td>II</td>
<td>080</td>
<td></td>
<td>Option B appears to better fit the “mixed use” concept for land use near the station. Clarify which improvements are proposed with the project, and for those that are not, include them in the mitigation chart, 6.2-7. Also show pedestrian (e.g., crosswalks) improvements.</td>
</tr>
<tr>
<td>II</td>
<td>081</td>
<td></td>
<td>It is unclear whether the intersection improvements (lengthen SB Route 7 dual left) proposed with the DEIS are still proposed with the preferred LPA. Also, there are 2 “emergency stairs” proposed for the station. Could one of them be upgraded for use by regular pedestrian traffic?</td>
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<td>1</td>
<td>1-7</td>
<td>1.3</td>
<td>In the fourth sentence of the 2nd paragraph, the reference to densities “ranging from 8 to 45 dwelling units per acre” is development potential without the rail intensity bonus; development potential with bonus can be 100 du/ac at some future stations. This sentence should be reworded as follows: “The Fairfax County plan calls for dense development in the corridor with intensities in excess of 1.0 FAR in future transit station areas. Higher-intensity, mixed-use development ....”</td>
</tr>
<tr>
<td>1</td>
<td>3-1</td>
<td>3.1</td>
<td>In the 2nd and 3rd sentence of the 2nd paragraph, the information about the Tysons II rezoning is not correct. The zoning case increased the PDC’s potential from about 4,655,000 sq. ft. to 6,821,000 sq. ft. (or an increase of almost 2.2 million square feet). The maximum building height is 30 stories, not 25 stories. The development has 12 high-rise buildings of which four are built (or eight new buildings). The two sentences need to be corrected based on the information provided.</td>
</tr>
<tr>
<td>1</td>
<td>3-3</td>
<td>3.1.1.2</td>
<td>The second bullet under “B. Proposed LPA Phase I”, is not true since the Comprehensive Plan envisions higher intensity at future stations west of Wiehle Avenue. This bullet should be reworded to indicate that the LPA Phase 1 is not consistent with the Comprehensive Plan; the wording could be similar to the 3rd bullet which addresses Loudoun County.</td>
</tr>
<tr>
<td>1</td>
<td>3-5</td>
<td>3.2</td>
<td>Figure 3.2-1a: The Regency and Encore high-rise multifamily development should be added to this map (as well as Figure 3.2-1b); the development’s location is inside the Beltway, south of Route 123 and abuts the Dolley Madison Village apartments.</td>
</tr>
<tr>
<td>1</td>
<td>3-6</td>
<td>3.2</td>
<td>Figure 3.2-1b: The land area of the Sheraton hotel should be removed from the area labeled Westwood Village.</td>
</tr>
<tr>
<td>1</td>
<td>3-22</td>
<td>3.3</td>
<td>Table 3.3-1 seems to have an error in the LPA Phase 1 (2025) and LPA Phase 1 (Opening Year) columns; since Phase 1 will impact fewer properties than the Full LPA, the acreage impacted should be notably less than 139.3 acres.</td>
</tr>
<tr>
<td>1</td>
<td>3-25</td>
<td>3.4.1.2</td>
<td>Under the last bullet on this page, the text refers to the “Hunter Mill Road Historic District”. This area is not a “District”: the area is eligible for being considered for placement on the state or national registers; in other words a proposed “District”. The bullet should be corrected by referring to this area as a “proposed district”. References to this area are throughout the SEIS; all references need to be corrected; the following pages (which may not be a comprehensive list) include reference to this area: pages 3-28, 3-33, 3-35, 3-36, 7-2 and 7-4.</td>
</tr>
<tr>
<td>1</td>
<td>3-29</td>
<td>3.5</td>
<td>Figure 3.5-1a: The proposed Hunter Mill Road District is shown, but not labeled on this map.</td>
</tr>
<tr>
<td>1</td>
<td>3-33</td>
<td>3.5</td>
<td>Table 3.5-1: In addition to correcting the Hunter Mill Road District issue, the last row of the third column indicates that the Road has “not yet” been designated a Scenic Byway, which is not correct. The Road has been designated a Scenic Byway (page 3-37 correctly states that the designation occurred since the publication of the DEIS).</td>
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Reviewer: Sterling Wheeler
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<td>II</td>
<td>13</td>
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<td>Wiehle Avenue station: On the south side of the station, a pedestrian connection to the west should be provided that connects to a sidewalk on Association Drive or Commerce Park Drive, this connection should provide improved access from the residential areas along Soapstone Drive. Another issue concerns joint development on the north side of the station; the final EIS should demonstrate how transit improvements do not conflict with the County's joint development objective for this property.</td>
</tr>
<tr>
<td>II</td>
<td>17</td>
<td></td>
<td>Tysons West station: As indicated in the BOS comment, consideration should be given to locating the bus facility and parking to the south side of Tyco Road; the purpose is of relocating the facility is to improve joint development opportunities, to improve pedestrian access and to have potential improvement in bus access; for example two points of access (one from Tyco Road and one from Spring Hill Road) should be considered for this facility.</td>
</tr>
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<td>II</td>
<td></td>
<td></td>
<td>The pedestrian connections are not shown for the Tyson Central 7 Station.</td>
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Page 2 of 2
Reviewer: Sterling Wheeler
### COMMENTS ON SDEIS TEXT

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<td>1</td>
<td>4-4</td>
<td>4.2</td>
<td>The SDEIS states: “Amendments to the Chesapeake Bay Preservation Ordinance have been proposed by Fairfax County . . .” Amendments to the Ordinance were adopted by the Board of Supervisors on July 7, 2003 and became effective on November 18, 2003. The SDEIS suggests that Intensely Developed Areas (IDAs) would be designated; this has not been done. However, Resource Protection Area (RPA) designations have been revised, with the effect being that the extent of RPAs in Fairfax County has grown considerably (per a State requirement). Several of the proposed stormwater management facility sites (P-6, P-8, P-14, and P-17) are, or may be, located in “new” RPAs. In addition, one of the proposed tie breakers (B-6) is in an area that has been mapped as a “new” RPA. The RPA designation would not necessarily preclude the construction of these facilities; however, exceptions allowing for these encroachments will need to be pursued and will probably require public hearings. It is noted that the tie breaker site and the site for proposed pond P-14 are located in areas that have been subject to extensive disturbance. Coordination with the Office of Site Development Services of the Department of Public Works and Environmental Services (703-324-1720) is recommended.</td>
</tr>
<tr>
<td>1</td>
<td>4-4</td>
<td>4.2</td>
<td>The proposed Route 28 station facilities north of the Dulles Toll Road may encroach slightly into a new RPA. Project designers should coordinate with the Office of Site Development Services on this issue.</td>
</tr>
<tr>
<td>1</td>
<td>4-27</td>
<td>4.7.1.2</td>
<td>The DEIS indicated that there would be 260 residences at the West Falls Church S&amp;I yard that would be affected by noise levels from the yard in excess of 55 dBA (Fairfax County’s stationary source noise standard for impacts on residential properties); this was attributed to wheel squeal associated with a 300-foot radius curve at the yard. The SDEIS commits to the enclosure of this curve as well as the enclosure of a new portal that would connect the main line of the tracks along the Dulles Connector Road with the S&amp;I yard. The proposal to enclose the tracks should be commended; however, it would be helpful if the EIS would note what the noise reduction benefits of the enclosures will be as they relate to event-specific noise impacts—what will be the decibel reduction for individual events that would result from the enclosures? Will wheel squeal from the enclosed tracks be audible? If so, what will the event-specific decibel levels be on nearby residential properties? Will any residences still be exposed to noise levels from wheel squeal in excess of 55 dBA?</td>
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</table>
| 1    | 4-27 | 4.7.1.2 | This section notes that additional storage tracks will be needed at the West Falls Church S&I yard “in order to increase the storage capacity from 26
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<td>I</td>
<td>5</td>
<td>Env. Cond. Sheets</td>
<td>rail vehicles under the Draft DEIS Metrorail Alternative to 42 rail vehicles for the proposed LPA.” The new tracks would be located closer to residences than the existing tracks. No information is provided regarding the noise level increases that would be associated with the additional storage, although it is noted that the overall change in noise, when considering both the increased storage and the noise reductions associated with the proposed track enclosures, would be a reduction of seven decibels. It is not clear if this seven decibels reflects an overall average noise level reduction or if it is meant to apply to a hypothetical single event. In any case, more guidance should be provided regarding the nature of the increased noise impacts associated with the additional vehicles (e.g., train movements; horns), and whether there will still be any residential receptors exposed to single event impacts of 55 dBA or more.</td>
</tr>
<tr>
<td>I</td>
<td>6</td>
<td>Env. Cond. Sheets</td>
<td>As noted in my comments on the DEIS, facilities associated with the Tysons East station will, in part, be located in a Resource Protection Area. In addition, an Environmental Quality Corridor has been identified on the site of the proposed Tysons East Kiss and Ride facility. A contractor work area is identified near the Tysons East station site; part of this site is located in the RPA. However, much of the RPA in this area has already been disturbed and is impervious in character. Coordination with the Office of Site Development Services is recommended as early in the process as possible to address possible Chesapeake Bay Preservation Ordinance issues associated with the station location, the Kiss and Ride facility, and the contractor work area. Project staff should also be encouraged to coordinate with DPZ to identify possible approaches to addressing the Environmental Quality Corridor in this area.</td>
</tr>
<tr>
<td>II</td>
<td>79. 81. 86. etc.</td>
<td>X</td>
<td>Proposed stormwater management facility P9 is located in an area that has been established as a conservation easement. It is not clear if it would be feasible to construct a stormwater management facility at this location.</td>
</tr>
<tr>
<td>II</td>
<td>79. 81. 86. etc.</td>
<td>X</td>
<td>It is not clear if stormwater management measures are being proposed for several of the station facilities (e.g., Wiehle Avenue station facilities; Tysons West facilities, Tysons East facilities), as no such measures are identified on the site plans for these facilities. At a minimum, those facilities that will be provided within Fairfax County should include stormwater management and best management practice controls that are as effective as those required for private development projects. Project designers should also be encouraged to pursue low impact development (LID/site design measures where appropriate (e.g., bioretention/biofiltration practices in parking lots) in order to reduce potential adverse impacts to streams. Many of the facilities identified in the documentation would lend themselves to such practices.</td>
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<tr>
<td>Gen. Plans</td>
<td>Various</td>
<td>Ponds P-8 and P-9 (and others?) would be located on the other side of a noise barrier from the highway/rail. These ponds would not, therefore, appear to be able to collect drainage from the project site. Is this the case? Is the idea to establish compensatory controls? If so, what areas will go uncontrolled, and what will be the impacts on downstream water resources?</td>
<td></td>
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</table>
Mr. Leonard Alfredson, PE  
Project Manager  
WMATA Office of Extensions  
1550 Wilson Boulevard, Suite 300  
Arlington, Virginia 22209  

Dear Mr. Alfredson:  

Please find below Fairfax County staff comments on the Preliminary Scope of Work for the Dulles Corridor Rapid Transit Project (DCRPT). This letter incorporates comments from the Department of Transportation and the Department of Planning and Zoning.  

General  
1. This project is located in a corridor with significant development activities and ongoing changes to adjacent uses and rights-of-way. Data collection and coordination will need to be a continuing effort, since existing conditions will be changing throughout the project. Proffer commitments and developments with various stages of approvals may have a significant effect on potential right-of-way costs. These will need to be monitored closely as the project progresses.  

Schedule  
2. County endorsement of the DEIS and FEIS should be listed as a separate PE/NEPA activity prior to CTB/DRPT, WMATA, and MWAA approvals.  

County Comprehensive Plan  
3. The Comprehensive Plan contains the following elements in the Tysons Corner area:  
   - Widen Route 7 to 8 lanes from the Dulles Toll Road to I-495  
   - Widen Route 123 to 8 lanes from Route 7 to I-495; 6 lanes from I-495 to the Dulles Toll Road connector  
   - Widen International Drive to 6 lanes from Route 7 to Route 123
Mr. Leonard Alfredson

Page Two

Provide interchanges at: Route 7/Route 123 (improved)
I-495/Route 123 (improved)
Route 7/Westpark
Route 123/International Drive
Route 7/International Drive

4. In addition to these planned road improvements, there are pedestrian facilities recommended
   in the Comprehensive Plan both in the Tysons Corner Urban Center and the Reston-Herndon
   Suburban Center plan text. Also, the Board of Supervisors has directed that on-pavement bike
   facilities be considered where appropriate.

5. We are requesting that WMATA work with VDOT and Fairfax County to develop
   conceptual designs (to about a 15% design stage) for the interchanges cited above in
   conjunction with the preliminary engineering for the DCRTP in order not to preclude their
   future construction.

6. Some conceptual design work may also be necessary for collocation of aerial alignments in
   Tysons Corner. Available roadway plans are not at the level of detail implied in Section
   5.25.1.

Right-of-Way
7. In several locations, existing service drives are not located within VDOT right-of-way. It
   should be noted that additional right-of-way may be required for the proposed transit project
   and/or future road widening projects.

Modeling/Forecasting
8. Task 5.23 indicates that WMATA has engaged MWCOG to conduct transportation models
   and references “Scoping Clarifications.” These are not evident and the meaning and effect of
   this reference are not clear.

9. In addition, it is stressed that the development of travel forecasts at the scale implied by the
    scope will require the preparation of detailed land use forecasts and the execution of complex
    travel forecasting models. Significant time is normally required to perform these activities. A
    more detailed schedule which sets forth the time requirements for preparing this data and
    executing these models should be distributed to local staff who may be involved in the
    preparation of the input for these activities.
Mr. Leonard Alfredson

Page Three

10. Task 5 appears to be scheduled for completion by January 10, 2001. It is presumed that the Technical Memorandum (Task 5.24) describing the methodology and findings of this analysis will be available by that date. It is critical that this information be available in order to fully evaluate the analysis.

11. An explanation should be provided as to how the one-way stations in the T-2 alignment will be modeled versus how two-way stations are modeled.

12. For the BRT/Metrorail alternative, a comparison of travel time should be provided between Reston/Herndon and the urban core for: a) BRT with a transfer at Tysons-West and b) BRT with a transfer at the West Falls Church - VT/UVA Metrorail Station.

13. At the Pre-Scoping meeting, WMATA staff indicated that the 1988 Development-Related Transit Ridership Survey will be used for preparing estimates of the amount development-related travel which will be captured by transit. The Department of Transportation possesses surveys from 1987 and 1989. Only a small percentage of the office and residential sites surveyed in those two reports were located outside the Beltway; therefore, it is suggested that caution be used in applying this data to the Dulles Corridor Rapid Transit Project EIS analysis.

Alignments

14. The following variations in the alignments proposed for study may warrant additional analysis at this stage of the project:

- Provision of a more direct connection to the Orange Line to and from the west.
- Variation of T-1 alignment that is aerial with a fourth station at Pike 7 Plaza.

15. Alignment T2 requires passengers to transfer in one direction. Ways to minimize the travel time impacts associated with the T2 alignment should be considered.

Related Studies

16. In addition to the related studies listed, the following should be added:
   HJR 276 – Tysons Area Transportation Projects
   Senate Document 35 – Transportation Improvements for the Reston Area

Editorial Notes

Page 9: BC1 (EB Travel Lane of Connector Road) should be considered an “as built” condition as it will be constructed in 2000.
Mr. Leonard Alfredson

Page Four

Page 63: Property Identification Plans, "a parcel numbering system will not be employed." We assume that since the County tax maps are being used as the base, the County's parcel numbers will be shown on these plans as they should be.

The County looks forward to working with you on this important project and advancing it in the most expeditious manner possible. Please do not hesitate to contact us for any assistance we can provide. Thank you for the opportunity to comment on this scope of work.

Sincerely,

[Signature]

Young Ho Chang, P.E.
Director

YHC/EW

Cc: Anthony H. Griffin, County Executive
   Robert Stalzer, Deputy County Executive
   Leo Bevon, VDRPT
   James Zook, DPZ
K.4.3 Fairfax County Park Authority

- August 16, 2002
- August 7, 2002
- August 4, 2002
- August 19, 2002
August 16, 2002

Mr. Corey W. Hill
Northern Virginia Regional Manager
Virginia Department of Rail and Public Transportation
1550 Wilson Boulevard
Suite 300
Arlington, VA 22209

RE: Dulles Corridor Rapid Transit Project – Comments on DEIS

Dear Mr. Hill:

The Fairfax County Park Authority (FCPA) has reviewed the Draft Environmental Impact Statement (DEIS) and offers the following comments:

1. FCPA comments on the NEPA EIS Scoping Process were provided on August 15, 2000. These comments stated that FCPA favors the rail alternative for the Dulles Rapid Transit Project. FCPA continues to support this alternative as the best alternative for improving regional transportation options, enhancing public accessibility to parkland and long term protection of Park resources. Further, our previous comments, a copy of which is attached, identified potential areas of impact to FCPA-owned properties. The impacts to FCPA properties are relatively similar for each alternative and have been adequately identified in the DEIS.

2. Areas of cultural and historical resources were identified in the DEIS primarily based on information provided by the State Historic Preservation Officers (SHPO). To augment the information provided by the SHPO, we have attached an archeology impact assessment, analysis and recommendations from the County Archeologist and FCPA Cultural Resource Protection Group. Please note that the County Archeologist has offered to assist in any archeological work that may be undertaken.

3. FCPA reiterates its concerns that trail crossings within Stream Valley Parks adjacent to the transit alignment be included in design efforts. Further, connections from existing and planned trails to the planned stations should be designed to enhance station access. Accommodations for pedestrian and bicycle access and trail connections should be coordinated with FCPA and the County trails planner and incorporated into right of way acquisition and rail alignment planning and development.
4. Potential partnerships with FCPA to incorporate park and recreation related amenities at station locations should be explored. As mentioned in our previous comments, features such as green space, landscaping, picnic tables, cultural or natural resource interpretive areas or open space design with fountains or other elements creating a sense of place should be explored.

Thank you for the opportunity to provide input into this important transportation study. If you have any questions regarding these comments, please contact Sandy Stallman, Long Range Planner, at (703)324-8643 or by e-mail at sstall@fairfaxcounty.gov.

Sincerely,

[Signature]

Eynn S. Tadlock, Director
Planning and Development Division

cc: Winifred Shapiro, Chair, FCPA Board
    Paul Baldino, Director
    Mike Kane, Deputy Director
    Kirk Holley, Manager, Planning and Land Management Branch
    Sandy Stallman, Long Range Planner
TO: Michael Rierson  
Park Operations-Resource Management Division

FROM: John Rutherford,  
Cultural Resource Protection Group

SUBJECT: Archaeological Assessment of Dulles Rapid Transit Corridor

The Cultural Resource Protection Group (CRP) of the Fairfax County Park Authority has reviewed the alignments for the Dulles Rapid Transit Corridor. Construction along this corridor will impact six parks owned by the Fairfax County Park Authority. The parks included in this assessment are Scott’s Run, McLean Hamlet, Ashgrove, Difficult Run, Olney and Hutchison School Site. A number of important archaeological resources were found to exits in these parks. A full list of all Cultural Resources in the corridor was provide by County Archaeological Services and was detailed in a memo by Mike Johnson, County Archaeologist, dated 04 August 2002.

The Cultural Resource Protection Group has reviewed this memo and concurs with its recommendations. Important sites found within the parks include 44FX 2470 (Odrick Site), 44FX1597 (Ashgrove and other related sites, including 44FX2205 and 44FX2203). The CRP recommends complete avoidance of these sites. All of these sites are important to the history of Fairfax County, and as such, deserve special attention.

As noted on the figures from County Archaeological Services, areas of moderate or high potential for archaeological sites should also be surveyed prior to any construction.

Feel free to contact the Cultural Resource Protection Group, if you have questions or comments.

Cc Richard Sacchi- Cultural Resource Protection Group;  
Mike Johnson- County Archaeological Services
TO: Michael Rierson, Manager
    Resource Stewardship Section - RMD

FROM: Mike Johnson, Archeologist
    Fairfax County Archeological Services - RSS/RMD

SUBJECT: Dulles Corridor Rapid Transit (DCRT) project archeological resource assessment

Table 1 (assessments), Figure 1 (map index) and the attached annotated ortho-
photography maps are forwarded as requested. The assessments in Table 1 reflect
approximately 25 years of program experience and acquired archival data on the DCRT area.

It is understood that significant portions of construction will be confined to the current
Dulles Access and Toll Road corridor. As such many of the attached recommendations will be
irrelevant to this project.

However, they are provided with the understanding that with projects of this nature
construction staging areas are often used outside the right-of-way. Often these do not appear on
the construction plans and requests for comment but should be treated as a part of the
construction.

No comments were provided on areas that had already been developed.
Remarks/recommendations concerning particularly sensitive areas are highlighted in bold under
the "Remarks" column in Table 1.

From the standpoint of this office, site 44FX1569 is of particular interest from an overall
resource planning perspective. The site was subjected to a phase 2 assessment in the 1980s. The
results were conclusive from a functional standpoint but without chronological data the
functional data is largely worthless. To justify the phase 2 cost to the public this situation should
be rectified.

I urge the oversight agencies to build additional phase 2 testing or construction
monitoring into the plans for the any construction that will destroy this site. Arrangements can
be made with FCAS for this archeological work.

Please let me know if you have any questions or need additional information.
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See attached maps - numbers refer to map and letters refer to site or survey area.

** Phase 2 was done by Ed Otter in 1980's on heavy prehistoric quartz quarry. No chronologically diagnostic artifacts were recovered. For Otter's data to be worth anything the site should be dated.**
Figure 1: Index to assessment area maps.
August 19, 2000

Dulles Corridor Rapid Transit Project
1550 Wilson Boulevard, Suite 300
Arlington, Virginia 22209

Re: Dulles Corridor Rapid Transit Project – Comments on NEPA EIS Scoping Process

To Whom It May Concern:

Representatives from the Fairfax County Park Authority (FCPA) attended several of the scoping meetings and we offer the following comments for inclusion in the NEPA EIS project evaluation process:

1. Build Alternatives - Construction of an alternative mass transit system will reduce the long term transportation and environmental impacts to Park Authority Parks and Resources. Therefore, Build Alternative #3 (Construction of Metro Rail for the full length of the Dulles Corridor, between the Orange Line and Route 772) would be the desired alternative with respect to enhancing public accessibility to parkland and long term protection of Park resources.

2. Parks and Recreation Planning Strategies – The Park Authority would like to be included in a planning process, which could incorporate open space, and recreational planning initiatives into design of the proposed build alternative. During the Loudoun County scoping meeting, a citizen made the suggestion that commercial ventures be designed and included within the rail stations. This could possibly include small convenience stores, dry cleaners, snack shops or restaurants. We thought that this was an excellent idea and would like to expand on this idea by including incorporation of park and recreational facilities. This could include at a minimum green space, landscaping features, open space design with fountains or elements creating a sense of place. Minor recreational facilities such as checkerboard tables, picnic tables, etc. should definitely be investigated. In addition, it is recommended that formal recreational facilities be incorporated into the design. This could include multiuse courts; walkway connections to planned park trails, cultural/historical interpretative stations, etc.

3. Environmental Concerns - The FCPA has a number of environmental concerns relating to construction of the future rail lines, stations, and ancillary facilities. The actual construction of these systems may result in significant environmental impacts downstream and in Park property located in the immediate vicinity of the railway. The following are specific concerns:

VOICE: (703) 324-8563  TTY: (703) 324-3988  VISIT THE PARKS ONLINE: www.co.fairfax.va.us/parks
• Biological Resources – Sedimentation from construction activity can have a significant impact on the downstream biological ecosystems and habitats. Mitigation measures beyond the standard erosion and sediment control construction practices need to be investigated.

• The Park Authority owns several significant stream valley parks, which are located, downstream of the construction. These are Sugarland Run, Difficult Run, and Scotts Run Stream Valley Parks. Construction impact mitigation measures need to be used to prevent degradation of park resources during project construction.

• Emergency plans should be in place for potential hazardous material spills or discharge from the construction area or future ancillary facilities.

• Any construction project of this magnitude will have any impact upon the watershed infrastructure both during construction and overtime. This impact needs to be studied thoroughly to prevent degradation of park resources.

• The potential location, type, and effectiveness of any associated stormwater management facilities needs to be investigated.

• There are recorded archaeological sites adjacent to the rapid rail corridor. Some of the sites are located within the park property and some are not. A cultural resource survey should be undertaken and mitigation of any disturbed cultural/historical artifacts. If the land has not been previously disturbed by development, there may be potential for recovering artifacts just prior to construction.

4. A significant amount of park resources in the form of stream valleys and drainageways to preservation areas are located downstream of the proposed development. The impact to these areas needs to be fully investigated and mitigated. The most significant natural resource and stream valley parks located downstream of the development include:

• Lake Fairfax Park
• Scotts Run Nature Preserve
• Difficult Run Stream Valley Park
• Scotts Run Stream Valley Park
• Sugarland Run Stream Valley Park

5. The location of any ancillary facilities such as the bus maintenance depot, rail yard, power substations and tie breaker stations should be proposed at this time. These areas would encompass a relatively large area and could have an impact on parkland or a significant feature in the community.

6. The Fairfax County Comprehensive Plan calls for continuous trail connections within designated stream valley areas. The Park Authority is in the process of planning and engineering for construction of key segments of the stream valley trails. There are several locations where the stream valley trails will cross the rapid rail alignment. Overpasses or underground trail connections will need to be provided to insure the integrity of the trail.
connectivity. Planned connections as shown on the Fairfax County Comprehensive Plan are in the following locations:

- The Scotts Run Crossing with Route 123
- The Wolftrap Run Crossing with Route 267
- The Difficult Run Crossing with Route 267

In addition to those shown on the Comprehensive Plan, potential crossings are located as follows:

- Courthouse Spring Branch with Route 267
- Sugarland Run with Route 267

A pedestrian crossing plan will need to be developed and reviewed by the Fairfax County Park Authority as part of the EIS process.

If you have any questions regarding these comments, do not hesitate to contact me at (703)324-8725 or by e-mail at Karen.Lanham@co.fairfax.va.us.

Sincerely,

Karen H. Lanham
Planner III
August 15, 2000

Dulles Corridor Rapid Transit Project
1550 Wilson Boulevard, Suite 300
Arlington, Virginia 22209

Re: Dulles Corridor Rapid Transit Project – Comments on NEPA EIS Scoping Process

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Dulles Corridor Rapid Rail Transit Project  
Comments on NEPA EIS Scoping Process  
Fairfax County Park Authority  
August 15, 2000  
Page 3  

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Sincerely,

Karen H. Lanham  
Planner III
K.4.4 Loudoun County, Board of Supervisors

- December 16, 2003
- Verbal Testimony at July 2002 Public Hearing (Mr. William Bogard)
December 16, 2003

Mr. Karl Rohrer, Project Manager  
Virginia Department of Rail and Public Transportation  
1550 Wilson Boulevard, Suite 300  
Arlington, Virginia 22209

Dear Mr. Rohrer:

Loudoun County wishes to enter the following statement in the Public Record in connection with the Dulles Corridor Rapid Transit Project.

County policies identify the Dulles Corridor Rapid Transit Project as one of the County’s priority transportation projects. “This project is considered particularly important for the County’s transportation system as it provides important surface transportation links to Dulles Airport and offers convenient commuting opportunities for County residents as well as employees who travel from neighboring jurisdictions to employment centers in the Dulles Greenway corridor”. (Revised Countywide Transportation Plan). The County needs this project to reduce congestion levels on major roadway connections to Fairfax County and the Region’s core and to stay within the Washington Metropolitan Area’s emissions budget and satisfy the requirements of the Clean Air Act. The County has demonstrated its commitment to the project by identifying a local funding match in the adopted Capital Improvement Program.

The County’s Smart Growth strategy is to encourage compact, pedestrian-friendly development in the area supported by well-functioning transportation systems. The Revised General Plan supports compact, high-density nodal development around proposed rail stations to limit sprawl and reduce public costs. The plan identifies a Transit-Related Employment Center (TREC) at the proposed Route 606 Station and a Transit-Oriented Development (TOD) at the proposed Route 772 station. The TREC is planned for concentrated employment use or Special Activity use while the TOD is planned for a mix of high intensity land uses ranging from high-density residential uses, regional offices, entertainment and cultural centers, and other business and support services. Both transit nodes are planned for increased densities when rail transit and facilities are planned, scheduled, designed, and fully funded. The Moorefield Station TOD and the Loudoun Station TOD applications were approved.

In addition, the Revised Countywide Transportation Plan describes how the County intends to serve the mobility needs of the growing populace: “As the County’s population has grown at its unprecedented rate over the past decade, residents, employees, and visitors are increasingly feeling the strain on the County’s transportation system”. The Washington Metropolitan Area’s designation as a severe non-attainment area for ozone pollution under the Clean Air Act makes it imperative that multi-modal transportation planning be a part of the County’s overall transportation strategy. This
strategy includes “steadily increasing the prioritization and allocation of resources to the development of public transportation services, especially rail in the southeastern end of the Dulles Greenway corridor”.

The Dulles Corridor Rapid Transit project is of utmost importance to Loudoun County and is critical to the future adequate functioning of the transportation network. Growth patterns envisioned in the Comprehensive Plan are dependent on the project. As such, it is essential that the Locally Preferred Alternative (LPA) move forward. The LPA consists of 11 stations, 5 of which are in Phase 1 and the remaining in Phase 2. If the LPA were to be delayed or abandoned, market forces rather than comprehensive planning would determine the future land use of Loudoun County.

Economic reality in Federal appropriations may require that the project be divided into two phases, but it must be viewed as one project. It should be noted that Loudoun County has put in place funding mechanisms to fully fund its share of the project. There has never been any doubt as to Loudoun’s financial commitment to this project either with the original single project or the currently proposed two-phase project.

Loudoun County takes strong exception to the statement in the Executive Summary, “FTA had determined that the first phase now being considered for the funding has independent transportation utility even if the subsequent phase is never built.” (p. s-3) To terminate this project at Wiehle Avenue would undermine land use policies of neighboring Fairfax County, and would forever condemn the economic future of one of the premier development corridors in the United States.

The most pressing issue is the need to complete the full Locally Preferred Alternative (LPA) by the current scheduled date of 2015. There are those who would oppose this on the grounds of cost and number of riders served. This is based on the false assumption that Bus Rapid Transit (BRT) can handle the future transit needs of the Dulles Corridor. The use of BRT in lieu of rail takes on some apparent credibility when viewed in the strict context of Environmental Impact Analysis. The analysis year of the EIS is 2025, with phase 2 not operational until 2015. It is shortsighted to measure a system that will last a century by what it will deliver in a decade.

In summary, Loudoun County strongly endorses this project. It is vital to our future economic success, the management of traffic congestion, improved air quality and will be a major determinant of how we mature as a region.

We are pleased to have the opportunity to submit these comments.

Sincerely,

Scott K. York
Chairman
Thank you very much.

MR. KLINGE: Thank you, Delegate Plum.

And now we have Bill Bogard, member of the Loudoun County Board of Supervisors. Welcome.

STATEMENT OF BILL BOGARD

MR. BOGARD: Thank you, Mr. Chairman, members of the panel.

Before I get started tonight, I would like to note that we have been joined by Supervisor Harris from the board of supervisors. I think he was absent a little bit earlier when we were doing introductions.

On behalf of the Loudoun County board of supervisors, I am pleased to have this additional opportunity to provide comment on the Dulles corridor rapid transit project and the draft environmental impact statement.

Previous to this evening's hearing, we, Loudoun County, have offered specific technical comments in a letter to Mr. Dittmeier dated April the 18th, 2002. Thus, tonight I will offer only comments of a general nature.
Loudoun County's revised comprehensive plan carries forward the central concept that development should be systematic in compact communities and in the right location in order to function well and enable the county to provide adequate and cost-efficient public services.

In the western part of the county, the plan provides for a strengthened rural economy, while reducing residential densities. In the eastern part of the county, the emphasis has been to reinforce the match between infrastructure and planned land use, creating communities that are distinct, well designed and well serviced. This is smart growth to which we are fully committed.

A major element of this smart growth strategy is the Dulles corridor rail project, and our land use policies are specifically structured to maximize the benefits and the opportunities presented by the Dulles corridor rail project stations at both Route 606 and 772.

The county plan also recognizes that we must look toward options to the automobile to
satisfy our transportation needs. We have taken major steps to expand our transit and ridesharing services and will continue to do so to meet the needs of our citizens and to provide viable options to the automobile.

Loudoun County stands ready to support its share of this project financially and has a funding mechanism to accomplish this. We are concerned that other funding may not be available on the originally proposed schedule and strongly urge that all means necessary be taken to put a funding plan in place that will deliver this project on its current schedule. This project is too important to allow it to be delayed.

A savings in both time and funding that could be achieved on this project is the elimination of the bus rapid transit phase and going directly to rail. While BRT initially may have had certain advantages, such as a favorable Federal funding ratio, this is no longer the case. To include BRT may also have the added disadvantages of increasing the project's overall
cost and, perhaps most importantly, it would present significant operational problems if you were to build the rail line while keeping BRT operational.

Frankly, we do not see the cost justification and operational advantages for building BRT over maintaining or enhancing bus services that Loudoun County and others currently operate in the Dulles corridor.

With respect to the rail yard options, we are opposed to yard site 7 and 20 and favor yard site 15. Site 15 meets all of the Washington Metropolitan Area Transit Authority requirements and allows sites 7 and 20 to be developed as envisioned in the county's comprehensive plan. In time, these properties will contribute to the WMATA customer base.

In conclusion, we offer our strongest support possible for the extension of the WMATA metrorail system into Loudoun County. We are prepared to participate financially and have developed our land use policies to maximize the
value of the system.

Thank you.

MR. KLINGE: Thank you, Mr. Bogard.

And now I will turn the introductions over to Supervisor Dana Kauffman.

MR. KAUFFMAN: Thank you, Mr. Klinge.

I will be calling speakers three at a time, to give you folks time to proceed closer to the podium to help us move the proceedings along.

Our first speaker is Thomson M. Hirst, to be followed by Robert E. Buchanan and Patricia Nicoson.

STATEMENT OF THOMSON M. HIRST

MR. HIRST: Good evening. My name is Thom Hirst, and I live and work in Reston. In addition to my day job, which is in commercial real estate, I started the Rapid Transit Action Committee or RTRAC, which was formed to research and promote cost-efficient ways to provide better rapid transit now, not 10 to 15 years from now, but now, and at a cost we can afford.

Everyone agrees that we need rapid
K.4.5 Loudoun County, Office of the County Administrator

- February 25, 2004
- December 9, 2003
- December 20, 2002
- October 24, 2002
February 25, 2004

Mr. Karl Rohrer, Project Manager
Virginia Department of Rail and Public Transportation
1550 Wilson Boulevard, Suite 300
Arlington, VA 22209

Re: Dulles Corridor Rapid Transit Project – Public Hearings Report (Docket Number R03-6)

Dear Mr. Rohrer:

Thank you for the opportunity to comment on the above referenced report.

General Comments:

- We wish to reiterate our previous comment questioning the evaluation of alternatives using a 2025 forecast horizon year. Results for the full LPA should use a broader forecast horizon year given that the full build LPA would be in operation by 2015. County staff does not feel that a 10-year forecast horizon provides an adequate picture. The response contained in the Public Hearings Report provides that 2025 is the forecast horizon year used in the Draft EIS and Supplemental Draft EIS because it allows for a comparison between the proposed alternatives in a future year in which they would have achieved their full potential. While 2025 as a forecast horizon year for the Draft EIS may have been appropriate, County staff do not feel this is the case for the Supplemental Draft EIS. The Draft EIS did not anticipate the Locally Preferred Alternative being developed in two phases. Additionally, the Draft EIS anticipates the Locally Preferred Alternative being operational in 2010. The Supplemental Draft EIS anticipates the Locally Preferred Alternative being developed in two phases with phase 2 being operational in 2015. County staff believes that these differences necessitate that a different forecast horizon be used when evaluating the alternatives in the Supplemental Draft EIS.

- The term "Premium Bus Service" still causes us concern. While we appreciate your email of February 17th on this subject, we still have concerns where the report speaks to this issue. We need to fully address the concept of Premium Bus Service. The report has a limited definition on page 106, but to us this sounds very much like the service we are now providing.
• It should also be noted that in your operating plan for Phase 1 we feel it would be much more advantageous to build commuter parking at the future Rt. 772 station than to expand parking at Dulles North, where we currently have several hundred excess spaces.

Specific Comments:

• P 45
  Comment 0016
  Passengers will not be required to transfer to "Premium Bus Service" at the Rt. 606 station. Response should state Loudoun County is currently running service to Leesburg and that such service will continue. The wording in the Report appears to contradict your above referenced email.

• P 104
  Comment 0107
  "Capital Costs for Premium Bus Service are included in the projects capital cost estimate". Please define statement. What are the items covered in the estimate, and what is the amount for each?

  Comment 0061
  "The premium bus service will replace express bus service currently run by Loudoun County into Roslyn and Downtown Washington". This is an incorrect statement. While we appreciate your email on this subject, this still needs to be corrected in the final document.

If you have any questions on these comments, please contact John Clark for clarification.

Sincerely,

Kirby M. Bowers
County Administrator

cc: Julie Pastor, Planning Director
    Linda Neri, Deputy County Administrator
    Sarah Coyle, Community Planning Division Manager
    John Clark, Director, Office of Transportation Services
    Mark Moszak, Environmental and Historic Programs Administrator
    Marie Genovese, Community Planning
    Terrie Laycock, Assistant County Administrator
December 9, 2003

Mr. Charles H. Ellis III
Department of Environmental Quality
Office of Environmental Impact Review
629 East Main Street, Sixth Floor
Richmond, VA 23219

Mr. Karl Rohrer, Project Manager
Virginia Department of Rail and Public Transportation
1550 Wilson Boulevard, Suite 300
Arlington, VA 22209

Re: Supplemental Draft Environmental Impact Statement and Section 4(f) Evaluation,
Dulles Corridor Rapid Transit Project (Hearing No. 160, Docket R03-6)

Dear Mr. Ellis,

Thank you for the opportunity to comment on the above referenced project. The Revised Countywide Transportation Plan (CTP), adopted on July 23, 2001, identifies the Dulles Corridor Rapid Transit Project as one of the County’s and Region’s priority transportation projects (CTP, text, p. 2-3). Additionally, the County’s Revised General Plan policies encourage transit-supportive development at planned transit nodes (Revised General Plan, pp. 6-22 to 6-27).

The County’s Bicycle and Pedestrian Mobility Master Plan (Bike/Ped Plan) was adopted on October 20, 2003. Please note that this document outlines policies establishing the need for high quality bicycle and pedestrian access to the future transit stations (Bike/Ped Plan, Transit and Demand Management Policies, p. 35). The County wishes to ensure that well designed bicycle and pedestrian access will be provided through the transit stations providing access to development on both sides of the Greenway. The County wishes to be a consulting party as the design program is further developed.

I have outlined by section and topic my comments below:

Section 1.3 Planning Context: Paragraph 2 notes the Countywide Transportation Plan this should be changed to the Revised Countywide Transportation Plan (2001).

Section 1.3 Planning Context: It should be noted that the Revised General Plan allows for up to 50 dwelling units per acre when rail transit and facilities are planned, scheduled, designed and fully funded to serve the area designated as a Transit-Oriented Development (TOD) (Revised General Plan, Policy 12c, p. 6-25). The TOD is located between the Loudoun County Parkway and Route 772 interchanges (Revised General Plan, text, p. 6-22). The transit node proposed for the Route 606 station is planned for a Transit-Related Employment Center (TREC), planned for concentrated employment use or Special Activity destination
(Revised General Plan, text, p. 6-22). Residential development is not permitted within the TREC due to the constraints of the Dulles Airport 65 Ldn, the Dulles North Transit Center, and the importance of preserving the natural environment (Revised General Plan, text, p. 6-22).

Section 1.3 Planning Context: The last sentence on page 1-7 should be edited to read "The Loudoun County Revised Countywide Transportation Plan also includes public support for transit services that would use the corridor, such as carpools, vanpools, bus and rail services, and other alternative modes, with specific funding support for bus services."

Section 2.2.4: Comparative Evaluation of Alternatives: County staff questions the evaluation of alternatives using a 2025 forecast horizon year. Results for the full LPA should use a broader forecast horizon year given that the full build LPA would be in operation by 2015. County staff does not feel that a 10 year forecast horizon provides an adequate description.

Section 3.1 Land Use: The total amount of development for Moorefield Station in this section is incorrect. Moorefield Station was approved for 10,750,000 square feet of non-residential development and 6,750 residential units.

Section 3.1.1.2.B. Proposed LPA Phase I: It should be noted that the Revised General Plan also supports the extension of rail facilities to the Dulles Airport (Revised General Plan, text, p. 4-8). Therefore, the proposed LPA Phase 1 is not consistent with the Revised General Plan because it would not provide rapid transit to Dulles International Airport and the Route 606 and Route 772 station areas.

Section 3.2.1.2.B. Proposed LPA Phase I: County staff asks that the first sentence on page 3-20 be clarified. "If the proposed LPA were not constructed in its entirety by 2025, neighborhoods located west of the Wiehle Avenue station area would not receive mobility benefits from access to Metrorail service during the proposed LPA Phase 1." Metrorail service is not planned to extend west of Wiehle Avenue as part of proposed LPA Phase 1.

Section 3.4 Visual and Aesthetic Conditions: This section states that a site plan has been approved for the Moorefield Station development. This statement is incorrect, the rezoning has been approved for Moorefield Station however, no site plans have been approved at this time.

Section 3.5 Cultural Resources: The County should continue to be a consulting party as impact mitigation strategies are discussed. Additionally, the Area of Potential Effect (APE) was defined as 200 feet beyond station footprints to allow for possible variation during construction. The County should be contacted if variations to the proposed alignment will impact additional sites.

Please forward a copy of the Programmatic Agreement from the State Historic Preservation Officer (SHPO) to:

Loudoun County Planning Department
c/o Marie Genovese
1 Harrison St., S.E., 3rd Floor
P.O. Box 7000
Leesburg, VA 20177-7000
Section 3.6.3 Mitigation: The document states that temporary construction impacts at the Moorefield Station recreation center and athletic fields will be mitigated, but does not provide any information as to how impacts will be mitigated.

Section 4.1.1.2A Proposed Full LPA: The total amount of development for Moorefield Station in this section is incorrect. Moorefield Station was approved for 10,750,000 square feet of non-residential development and 6,750 residential units.

Section 4.2 Water Resources: The County's Revised 1993 Zoning Ordinance was adopted on January 6, 2003 implementing many of the policies outlined in the Revised General Plan. The River and Stream Corridor Overlay District (RSCOD) was established with the revisions to the Zoning Ordinance (Section 4-2000). River and Stream Corridor Resources include:

a. "Rivers and streams draining 100 acres or more.
b. 100-year floodplains (including major and minor).
c. Adjacent steep slopes (slope 25 percent or greater, starting within 50 feet of streams and floodplains, extending no farther than 100 feet beyond the originating stream or floodplain).
d. 50-foot Management Buffer surrounding the floodplains and adjacent steep slopes.
e. Wetlands, forests, historic and cultural resources, and archaeological sites that fall within the area of one or more of the above elements" (Revised General Plan, Policy 2, p. 5-6).

Additionally, a 300-foot no-build buffer or the RSCOD, whichever is greater will be applied to scenic rivers, the Potomac River, the Bull Run, and the protected shoreline of drinking water reservoirs (Revised General Plan, Policies 1, 8, & 11, pp. 5-11 & 5-17). Please ensure that all the elements of the RSCOD have been taken into account when determining impacts to water resources.

Section 4.2.3 Mitigation: Coordination with local jurisdictions regarding mitigation for the nonconformity of any project elements within critical areas is listed as an available option. County staff considers this to be a requirement for any element of the project that impacts the RSCOD.

Section 4.2.3 Mitigation: The County supports the federal goal of no net loss to wetlands and will identify optimum receiving sites with a priority given to each geographic Policy Area (Revised General Plan, Policy 23, p. 5-8). Therefore, the County prefers any wetland impacts incurred in Loudoun County from the proposed project be mitigated within the Suburban Policy Area. However, if a wetland mitigation bank is not available within the Suburban Policy Area at the time the impacts are incurred County staff prefers that impacts to wetlands within Loudoun County be mitigated at the Bull Run Wetland Bank as shown on Figure 4.2-2.

Section 9.2.1.2B. Proposed LPA Phase 1: This section states that changes in land use under the proposed LPA and proposed LPA Phase 1 would be most dramatic in Loudoun County, where land use that is currently rural in nature would be converted to mixed-use suburban centers. It should be noted that the proposed alignment for the Dulles Corridor Rapid Transit Project is located in the
Suburban Policy Area as defined by the Revised General Plan and is planned for suburban-scale residential and non-residential development (Revised General Plan, Chapter 6).

County staff anticipates the Board of Supervisors to adopt a Resolution regarding the proposed project on December 15, 2003, at which time it will be forwarded to the Department of Rail and Public Transportation to be added to the public record.

If you have any questions regarding these comments please contact Marie Genovese, Planner in the Department of Planning at (703) 777-0246.

Sincerely,

Kirby M. Bowers
County Administrator

cc: Linda Neri, Deputy County Administrator
    Julie Pastor, Planning Director
    Sarah Coyle, Community Planning Division Manager
    Mark Moszak, Environmental and Historic Programs Administrator
    Marie Genovese, Community Planning
December 20, 2002

Ms. Karen Rae
Director of the Virginia Department of Rail and Public Transportation
Virginia Department of Rail and Public Transportation
1313 E. Main Street, Suite 300
PO Box 590
Richmond, Virginia 23218-0590

Dear Ms. Rae:

I am pleased to forward to you a copy of the Loudoun County Board of Supervisors Endorsement of Metro Garage Parking at the Route 772 Rail Station north and south of the Greenway. The Board’s action, taken on December 2, 2002, also directed me to provide a letter to VDRPT referencing the Board’s Endorsement of a Metro Garage Parking including the steps the County is taking to achieve consistency with County Transit Oriented Development (TOD) policies. Attachment 1 is a copy of the Board’s Endorsement.

The County has been coordinating with WMATA on issues related to bringing Metrorail Service through the Dulles Corridor to Loudoun stations. A WMATA analysis undertaken as part of the NEPA process shows an unconstrained parking demand of 3,300 parking spaces at the Route 772 station. This issue has become part of the County’s review of two high density transit oriented developments north and south of the station. The two developments are seen as providing resources for Metro Garage Parking as well as a Transit Connector Bridge running across the Greenway between the projects.

The first development, Moorefield Station, was approved by the Board of Supervisors on December 16, 2002. It is the largest mixed use development in the history of Loudoun County and will be a rich source of future patronage for the Metrorail System. The final proffer package includes twelve acres of land adjacent to the station dedicated to station land uses. An additional 3.6 acres will be dedicated for a conveniently located Metrorail Parking Garage. This site is proposed to provide approximately half of the necessary 3,300 parking spaces identified by WMATA. The proffers also provide for a network of multi-modal urban roads connecting the planned road network for Loudoun County with the Route 772 Station. Finally, the proffers provide funds for a portion of the cost of the Transit Connector Road.

We are also negotiating with developers north of the Greenway to provide land dedication for the remainder of the necessary 3,300 parking spaces. Loudoun County hopes to achieve this objective next year. The bottom line is the NEPA analysis did not assume any of these spaces would be provided at the Route 772 Station. Their provision will likely result in this station being the fourth highest generator of passenger loading on the Dulles Corridor Rail Line, out of thirteen stations, in a 2025 time frame. Only one of the Tysons Stations will have higher forecasted daily boardings.
We need VDRPT’s help to realize the full benefits of this progress. Loudoun County is asking at this time that the facilities necessary to accommodate the forecasted WMATA demand be incorporated into the Project and that cost of such facilities be treated as project costs. Specifically these facilities are garage parking for 3,300 vehicles and a vehicular bridge over the Metro tracks connecting the north and south parking garages at this station. We view the provision of these facilities as necessary to achieve the full beneficial results of the Metro Rail system, both to Loudoun County, but perhaps more importantly, to the region. If we do not accommodate demand at its origin, it will find alternative means of travel which may be detrimental to our Region’s air quality and congestion management goals.

If you have any questions concerning any of the material in this letter, please contact John Clark, Director, Loudoun County Office of Transportation Services at 703-737-8514 or jclark@loudoun.gov.

Sincerely,

Kirby Bowers
County Administrator

cc: John Dittmeier, WMATA
    John J. Clark, Director, Office of Transportation
    Corey Hill, Virginia Department of Rail and Public Transportation
    Hobie Mitchel, Commonwealth Transportation Board

Enc. Loudoun County Board of Supervisors Endorsement of Parking at Route 772 Rail Station
At a meeting of the Board of Supervisors of Loudoun County, Virginia, held in the County Administration Building, Board of Supervisors' Meeting Room, 1 Harrison St., S.E., Leesburg, Virginia, on Monday, December 2, 2002 at 9:00 a.m.

PRESENT: Scott K. York, Chairman
Eleanore C. Towe, Vice Chairman
William Bogard
James G. Burton
Eugene A. Delgaudio
Chuck Harris
Mark Herring
J. Drew Hiatt
Sally Kurtz

IN RE:   TRANSPORTATION COMMITTEE REPORT/PARKING AT ROUTE 772 RAIL STATION

Mr. Bogard moved that the Board of Supervisors approve the Transportation Committee's recommendation and endorse Metro garage parking at the Route 772 Rail Station north and south of the Greenway and that the Board direct the County Administrator to provide a letter to VDRPT referencing the Board's endorsement of parking at the Route 772 Rail Station, including steps the County is taking to achieve these policies consistent with County TOD policies.

Seconded by Ms. Kurtz.

Voting on the Motion: Supervisors Bogard, Burton, Delgaudio, Harris, Herring, Hiatt, Kurtz, and Towe –Yes; None – No; Supervisor York – Absent for the Vote.

A COPY TESTE:

[Signature]
DEPUTY CLERK FOR THE LOUDOUN COUNTY BOARD OF SUPERVISORS

OCR: december 2, 2002 resolution-j
October 24, 2002

Mr. Cory Hill
Northern Virginia Regional Manager
Virginia Department of Rail and Public Transportation
PO Box 590
Richmond, Virginia 23218-0590

Dear Cory:

This is in reference to the Public Hearings Report for the Dulles Corridor Rapid Transit Project. We complement the Project team on this significant effort. We are pleased the Project Team concluded as we did that we should go directly to Rail and that site Y15 is best for the yard site.

We do have a significant issue at the Route 772 station that we need to bring to your attention. The issue is that of parking. WMATA analysis of unconstrained parking demand at this station has estimated a need for 3,300 parking spaces. It is our intention, subject to Board of Supervisors (BOS) approval, to address this demand.

We have been working with two major active land development applicants immediately adjacent to the station and made significant progress in identifying locations for parking facilities to accommodate this demand. It is our belief that metro-parking garages on both sides of the station connected by a transit connector bridge offers the best possible solution. We are in negotiations with the developers and believe that we can get dedication of the land necessary to accommodate these improvements at no cost to the project.

The land involved in these potential dedications is currently in the process of rezoning. We estimate a resolution of these rezoning cases by the BOS in the foreseeable future. Assuming favorable action by the BOS, we are asking at this time that the facilities necessary to accommodate the forecasted WMATA demand be incorporated into the Project and that cost of such facilities be treated as project costs. We view the provision of these facilities as being in addition to the parking already included in the project at the Route 606 station, recognizing that only through such actions will we achieve the full beneficial results of the Metro Rail system, both to Loudoun County, but perhaps more importantly, to the region. If we do not accommodate demand at its origin, it will find alternative means of travel which may be detrimental to our Region's air quality and congestion management goals.

Sincerely,

[Signature]

Kirby Bowers
County Administrator

cc: John Dittmeier, WMATA
    John J. Clark, Director, Office of Transportation
K.4.6 Loudoun County, Department of Planning

- August 31, 2000
August 31, 2000

Mr. Leonard Alfredson
Project Manager
Dulles Corridor Rapid Transit Project
1550 Wilson Boulevard, Suite 300
Arlington, VA 22209

Dear Mr. Alfredson:

Loudoun County appreciates the opportunity to present its comments on the Scoping Process for the Dulles Corridor Rapid Transit Project. We also thank you for the project presentation to the Board of Supervisors Transportation Committee on July 10, 2000 and the Public Scoping Meeting held at the Ashburn Elementary School on July 27, 2000. The comments received at the Public Scoping Meeting should be carefully considered before the final scope-of-work for the project is prepared.

Loudoun County requests that the following comments also be considered in preparing the final scope-of-work.

1. The location, design and costs for vehicle maintenance and storage facilities in Loudoun (BRT and Rapid Rail) need to be completed early in the study to facilitate land acquisition.

2. The Comprehensive Financial Plan for capital and operating costs will need to include significant federal and state elements so that the local jurisdictions are not faced with an unreasonable cost burden.

3. Loudoun County needs to be connected with key areas in the Fairfax County section of the Dulles Corridor such as Herndon, Reston and Tysons Corner by transit service. We will work with the project team and Fairfax County to implement this service.

4. The early implementation of reverse commute transit service to Loudoun County is needed for rapidly growing businesses in Loudoun County.

5. The extent and time frame for Bus Rapid Transit (BRT) service will need to be determined. Currently BRT is being considered for a 2003-2009 time frame, with rapid rail reaching Loudoun County in 2010.
6. Relationships between proposed levels/types of service and the land use densities required to support such service levels needs more detailed evaluation.

Loudoun County looks forward to its participation in the Dulles Corridor Rapid Transit Project and recognizes the importance of your efforts.

Sincerely,

Sanjeev Malhotra, P.E., AICP
Chief of Transportation

cc: Kirby Bowers, County Administrator
Terrie Laycock, County Administration
Memory Porter, County Administration
Julie Pastor, Department of Planning
Art Smith, Department of Planning
K.4.7 Montgomery County

- February 23, 2004
- December 16, 2003
February 23, 2004

Mr. Karl Rohrer
Project Manager
Virginia Department of Rail and Public Transportation
1550 Wilson Boulevard, Suite 300
Arlington, Virginia 22209

RE: Dulles Corridor Rapid Transit Project,
Supplemental Draft Environmental Impact Statement and Section 4(f) Evaluation Public Hearing Report

Dear Mr. Rohrer:

Montgomery County supports the Dulles Corridor Rapid Transit Project and offers our comments on the Public Hearing Report for your further consideration as the environmental review process continues leading to the Final Environmental Impact Statement.

In our original letter on the Supplemental Draft Environmental Impact Statement, we commented on the need to identify and incorporate the future Capital Beltway Rapid Transit System as it is envisioned in the Northern Virginia 2020 Transportation Plan and the Fairfax County Transportation Plan into the Dulles Corridor Rapid Transit System in the vicinity of the Capital Beltway and Tysons Corner. The Public Hearing Report acknowledged our request, but did not address the technical issues.

While we understand the Dulles Corridor Rapid Transit System is much further ahead of the Beltway Corridor rapid transit system, there is still a need and necessity to consider to the fullest extent possible how and where a Beltway Corridor rapid transit system will interface with the Dulles Corridor Rapid Transit System. Further, is it our understanding that the Commonwealth of Virginia recently examined potential Beltway Corridors and has additional information that may prove useful in the Dulles Corridor analysis that we are requesting. It is very unlikely that another public opportunity for planning system integration will occur in the Tysons Corner area.
What we are seeking is a graphical depiction of the general connection of the Beltway Corridor to the Dulles Corridor Rapid Transit System, so that in future years the figure in the Final EIS is a reminder and starting point for the facilities planning of that transfer facility. We are interested in this matter, since eventually the Beltway Corridor will extend into Montgomery County.

Thank you for the opportunity to respond to your Public Hearing Document. Please contact Gary Erenrich of my staff at 240-777-7170 if you have any questions.

Sincerely,

Albert Genetti, Jr.
Director

AJG:GE:pn
December 16, 2003

Mr. Karl Rohrer  
Project Manager  
Virginia Department of Rail and Public Transportation  
1550 Wilson Boulevard, Suite 300  
Arlington, Virginia 22209

Dear Mr. Rohrer:

Montgomery County supports the Dulles Corridor Rapid Transit Project as outlined in the Supplemental Draft Environmental Impact Statement and Section 4(f) Evaluation. The Dulles Corridor Rapid Transit Project is consistent with regional planning processes at both the Transportation Planning Board in the Constrained Long Range Transportation Plan and at the Washington Metropolitan Area Transit Authority in the System Expansion program. The expansion of rapid transit benefits all of the region’s residents and businesses and strengthens the overall Metrorail system. This project is consistent with our belief that the region’s economic growth must be accompanied by a balanced transportation strategy including expansion of our transit and highway systems, technological improvements on our operations of the existing networks, and attention to alternatives to our current transportation modes.

Montgomery County envisions other rapid rail corridors and would like the Dulles Corridor Rapid Transit Project to be designed to facilitate the development of these other lines. Specifically, Montgomery County supports a future rapid transit corridor along the Capital Beltway connecting the Red Line in Montgomery County to the Orange Line in the Tyson’s Corner area. The expansion of rapid transit along the Beltway is also consistent with the Fairfax County Transportation Plan and the Northern Virginia 2020 Transportation Plan. The Supplemental Draft Environmental Impact Statement should acknowledge this potential Beltway rapid transit corridor. The document should ensure that any of the Dulles Corridor Rapid Transit stations proposed in Tyson's Corner or at Dunn Loring on the Orange Line will not preclude a future integration of the regional system. It would be desirable that the Supplemental Draft Environmental Impact Statement addresses how a future Beltway rapid transit system could connect to the Dulles system including passenger transfers, station platforms, and vehicle layover. Right-of-way should be preserved at the proposed Dulles Corridor Rapid Transit Stations to accommodate the future Beltway Corridor system.
Montgomery County believes that the Washington Metropolitan Area Transit Authority Board should address the operating and maintenance cost sharing formula so that all member jurisdictions have a clear understanding of their financial responsibility for both phases of the project. The Dulles Corridor Rapid Transit Project is potentially a 23 mile extension to a 103 mile system for a 22 percent increase in the system size, and this large a system expansion should be thoroughly reviewed by the funding partners at WMATA. Such a review can then be used by all jurisdictions to guide future system expansions.

Montgomery County will continue to work with the project sponsors to address the issues that we raised in this letter.

Sincerely,

[Signature]

Albert J. Genetti, Jr.
Director

cc: Robert Smith, WMATA Board Member
    Carlton Sickles, WMATA Board Member
    Richard White, WMATA
    Karen Rae, Virginia Department of Rail and Public Transportation
    Brian Glenn, FTA Washington DC
    Howard Shipman, FTA Regional Office
    Andy Scott, MDOT
    Honorable Phil Shapiro, Chair, WCOG Transportation Planning Board
K.5 LOCAL
K.5.1 City of Falls Church

- February 25, 2004
- October 23, 2002
- Verbal Testimony at July 2002 Public Hearings (The Honorable Daniel E. Gardner)
- Verbal Testimony at July 2002 Public Hearings (The Honorable David Snyder)
- July 30, 2002
- June 25, 1999
- February 4, 1999
February 25, 2004

Mr. Karl Rohrer  
Project Manager  
Virginia Department of Rail  
And Public Transportation  
1550 Wilson Boulevard, Suite 300  
Arlington, Virginia 22209

RE: Docket Number R03-6.

Dear Mr. Rohrer:

This is in response to the Public Hearings Report on the Dulles Corridor Rapid Transit Project. The City of Falls Church remains concerned that the Supplemental EIS, issued in October 2003, and this subsequent Public Hearings Report contain no mention of traffic impacts at, and around, the East Falls Church Metro Station.

The East Falls Church Metro Station will be the last station on the Silver/Orange line, and will have a significant increase in service frequencies. We believe it is contradictory to assume, as the EIS does, that there will be no traffic impacts at, and around, this station.

The City’s concerns were communicated to DRPT in a letter dated July 30, 2002, and included the commentary of an independent traffic engineer. These concerns were not addressed in the Supplemental EIS of October 2003. This omission was raised and repeated during our meeting on November 19, 2003, yet is not referenced in the Record of Public Hearings.

The Dulles Corridor Rapid Transit Project is a major and positive project for the region. The City of Falls Church, due to its location by the existing Orange line at the point of departure for the
propose new line to Dulles, will be significantly impacted. We have expressed our reasonable desire to know the nature and extent of this impact.

Therefore, we take this opportunity to request once again that the EIS for the Dulles Corridor Rapid Transit Project must include a traffic impact study for the area around the East Falls Church Metro Station.

Sincerely,

[Signature]

F. Wyatt Shields

cc: John Dittmeier, Acting Project Manager

Attachment
From: Robert Etris [REtris@ci.falls-church.va.us]
Sent: Wednesday, October 23, 2002 1:24 PM
To: Corey W. Hill (E-mail)
Subject: Public Hearings Report

Corey:

Thanks you for sending us a copy of the Public Hearings Report for the Dulles Corridor Rapid Transit Project. We have no comments on the impacts to the City's public utilities at this time. Please include us in the future as you circulate documents for review and comment or information. We would appreciate your sending us any plans, as the project progresses from concept through design, which would possibly impact our water system, which extends from the City to Tysons Corner.

Robert J. Etris
Public Utilities Engineer
City of Falls Church
703-248-5335 (phone)
703-248-5214 (fax)
571-238-6370 (cell)
in the interim.

Likewise, future planning needs to build upon the pioneering work already completed in Fairfax and Loudoun Counties to amend their comprehensive plans. That planning calls for rail stations with maximum access and flexibility for riders and transit-oriented development around the stations.

But for the decision before us tonight, that decision being the locally preferred alternative, the Dulles Corridor Rail recommends that we move to rail now.

Finally, I would ask that the record indicate that I used four minutes and 22 seconds of my 10 minutes.

Thank you.

MR. KLINGE: Thank you.

[Applause.]

MR. KLINGE: Now I'd like to introduce the mayor of the city of Falls Church, the Honorable Daniel E. Gardner.
MR. GARDNER: Good evening, Chairman Klinge and Chairman Hanley.

The city of Falls Church welcomes this opportunity to present concerns of the city to the Virginia Department of Rail and Public Transportation regarding the draft environmental impact statement for the Dulles Corridor rapid transit project.

Although supportive of the project, the city has some critical issues with regard to the EIS which we feel must be addressed before the project proceeds.

Generally we are concerned that although the city of Falls Church will be impacted by the project, our community overall has been overlooked in the EIS.

The impact area of the project includes the East and West Falls Church metro stations which are located on the perimeter of our city limits. We believe that the impact to the citizens and the environment of the city of Falls Church has neither been assessed nor mitigation measures considered or
developed. Specifically the city has the following concerns:

The draft EIS has failed to meet the legal requirements of environmental statement regarding significant impact analysis in particular areas as required by 40 CFR 1502.14 and 40 CFR 1508.9, including the city of Falls Church, which will be impacted by this proposed project.

The draft EIS has failed to fully assess water, traffic and transportation impacts on the city of Falls Church and thus fails to propose mitigation of those potential impacts.

The draft EIS has failed to adequately address issues of parking overflow in the residential areas adjacent to the East and West Falls Church metro stations.

The draft EIS has failed to adequately address public safety and infrastructure issues regarding pedestrian traffic, especially students conflicting with vehicular traffic in and around the West Falls Church metro station, given the prediction for increased vehicle trips per day.
Our middle school and high school are adjacent to that station.

The draft EIS has failed to address the environmental impact to surface and groundwater as it might affect the city's water distribution system that serves much of the corridor and Four Mile Run.

The city of Falls Church understands the legal requirements in the framework of the environmental impact statement, which is to assure that all issues, alternatives and concerns are weighed and evaluated for remedy.

In attempting to meet these specific requirements, we believe that mitigation of the project impact on the city of Falls Church and its immediate surroundings has not been sufficiently addressed.

We firmly believe this project will have a substantial vehicular traffic impact on the city as the East and West Falls Church metro stations transform into a major regional transportation hub in the future.
From the outset the city has been concerned that the project will bring thousands of additional motorists into the city, and urges that plans be made to accommodate the additional traffic. If these motorists drive to stations and cannot find parking, they will try to park on the residential streets, creating a significant impact on the surrounding neighborhoods.

The city has repeatedly requested that these impacts and others be anticipated and addressed.

The project, while appearing to be beneficial to the region, has a significant and direct negative impact on the city in a manner not fully analyzed in the draft EIS.

We have previously asked that this impact be thoroughly studied. However, we have now concluded it has not been given full consideration.

Overall, we strongly believe the draft EIS' lack of full analysis could prove disastrous for the city, the surrounding neighborhoods and our educational structures.
Moreover, we suspect there may be tremendous safety concerns if proper evaluations are not conducted. We believe our neighborhood streets will be inundated with motor vehicles and that the project will be considered a failure by our citizens.

Existing infrastructures will be adversely affected and must be effectively remedied by operational plans and new facilities.

While we may be critical of the EIS, and we are, we remain firmly committed to public transportation and recognize and accept that it is critical to the elimination of air pollution, minimization of vehicular transportation on city streets and in our neighborhoods.

Toward this end, section 10.3 of the draft EIS, entitled "Issues to Be Resolved," should be amended to include the issues raised by our written input.

The city council and I would appreciate your careful review and attention to these issues on behalf of all our citizens.
I would like to point out that our good neighbors in Arlington and Fairfax County also have these same issues in the area surrounding East and West Falls Church metro.

I will provide a complete copy to Mr. Hill, and I think we have mailed copies with full attachments as well.

Thank you very much for the opportunity to speak this evening, and we look forward to working with you in the future.

MR. KLINGE: Thank you, Mayor Gardner.

[Applause.]

MR. KLINGE: The next speaker is a member of the Falls Church city council, the Honorable David Snyder.

STATEMENT OF THE HONORABLE DAVID SNYDER

MR. SNYDER: Thank you very much, Chairman Klinge and Chairman Hanley, for this opportunity to be here this evening and to speak on this very important regional and local project.

Falls Church is a charter member of the metro system and so we take the issue of mass
I would like to point out that our good neighbors in Arlington and Fairfax County also have these same issues in the area surrounding East and West Falls Church metro.

I will provide a complete copy to Mr. Hill, and I think we have mailed copies with full attachments as well.

Thank you very much for the opportunity to speak this evening, and we look forward to working with you in the future.

MR. KLINGE: Thank you, Mayor Gardner.

[Applause.]

MR. KLINGE: The next speaker is a member of the Falls Church city council, the Honorable David Snyder.

STATEMENT OF THE HONORABLE DAVID SNYDER

MR. SNYDER: Thank you very much, Chairman Klinge and Chairman Hanley, for this opportunity to be here this evening and to speak on this very important regional and local project.

Falls Church is a charter member of the metro system and so we take the issue of mass
transit very, very seriously and support it in every day that we can. I have an opportunity to do so personally as former chair of the Northern Virginia Transportation Commission and as a representative of the city of Falls Church on the Transportation Planning Board.

But the reality is that Falls Church is the eastern terminus of this project, regardless of which of the alternatives are followed. Our first set of comments, summarized by Mayor Gardner, really relates to the technical, legal and factual issues which must be adequately addressed for a draft EIS and an EIS to pass muster under the law.

Page 8 of the summary lists those in four categories:

Social effects; environmental effects; economic effects; and transportation effects.

We believe that at a minimum this project, regardless of its alternatives, has the following social effects:

Community cohesion; displacement and relocation; visual and aesthetic conditions;
parklands and recreation areas; and especially safety and security, especially regarding pedestrians and school students in the area.

Secondly, as Mayor Gardner indicated, there may be very significant water resources effect, air quality, noise, vibration, hazardous and contamination materials and other effects.

Third, in terms of economic effects, its unequal economic effect is something that deserves additional study.

Finally, transportation effects again are inadequately studied under this draft EIS. And they include effects on local and regional roadways, transit parking, and bicycle and pedestrian facilities. And we have a written submission, which we ask be a part of this record.

Now as a matter of law and as a matter of fact, we believe that additional work needs to be done, and that the draft EIS and any EIS that fails to address these issues would be inadequate and incomplete as a matter of law.

But what is more important here is that
unless these issues are addressed successfully, this will not be a project that works for the citizens of this region. We note that in the handout this evening that one of the objectives is to increase mobility and accessibility, and another key objective is to accommodate future increases in transportation demand.

We certainly now and in the past and will be in the future are committed to achieving those objectives along with our colleagues and those others who share the region with us. And yet unless the issues are addressed which we have outlined in our written submission and we have talked about this evening, this will be like a beautiful, attractive island surrounded by a sea of sharks that you can’t get to.

In other words, what good is this transit system if you can’t get to it? And you can’t get to it unless you address systematically the neighborhood streets, the transit services that provide transportation, conceivably, to this important new addition to the region, and in
otherwise provide for a much greater area than is provided for now.

We know that the highways in the area that potentially would be accessed for this system are already significantly under stress and, frankly, break down regularly as effective transportation corridors. And those include Route 7, Route 29, Route 66, and many other neighborhood highways.

We recognize as well that there are significant pedestrian and school traffic throughout this area.

So for all the reasons indicated, we urge a much more significant study of the issues that we have talked about, that we urge inclusion of mitigating factors, and finally we urge that, not just for the citizens of Falls Church, but all the citizens of this potential region, because if it works for us, it will work for the region. If it doesn't work for us, it won't work for the region, either.

So with that, we would like to summarize by saying we appreciate the opportunity to be here,
we are absolutely committed to the objectives of increased mobility and accessibility, we are absolutely committed to mass transit, and we have shown it in every way possible. We do tonight and we will in the future, and we certainly want to accommodate future increases in travel demand more effectively than we have been able to in the past.

If we address the issues that we have outlined tonight, we believe that this project will achieve those objectives. If we don't, it fails as an EIS and it will fail as a project that serves the region.

Thank you very much.

[Applause.]

MR. KLINGE: Thank you, Councilman Snyder.

And now I am going to turn the meeting over to Ms. Hanley, who will introduce the people in the public who wish to testify. Ms. Hanley.

MS. HANLEY: Thank you, Mr. Klinge.

Let me ask one more time if you could join me, is there anyone who wants -- who requests signing services? Okay. Thank you.
July 30, 2002

Mr. Corey W. Hill
Northern Virginia Regional Manager
Virginia Department of Rail and Public Transportation
1550 Wilson Blvd.
Suite 300
Arlington, VA 22209

Dear Mr. Hill:

The City of Falls Church welcomes this opportunity to present the concerns of the City to the Virginia Department of Rail and Public Transportation (DRPT) regarding the draft Environmental Impact Statement (EIS) for the Dulles Corridor Rapid Transit Project (the Project). Although supportive of the Project, the City has some critical issues with regard to the EIS, which we feel must be addressed before the Project proceeds. Generally, we are concerned that although the City of Falls Church will be impacted by the Project, our community overall has been overlooked in the EIS. The impact area of the Project includes the East and West Falls Church Metro Stations, which are located on the perimeter of our City limits. We believe that the impact to the citizens and the environment of the City of Falls Church has neither been assessed nor mitigation measures considered or developed. Specifically, the City has the following concerns:

- The draft EIS has failed to meet the legal requirements of an Environmental Impact Statement regarding significant impact analysis in particular areas as required by 40 CFR 1502.14 and 40 CFR 1508.9, including the City of Falls Church, which will be impacted by this proposed Project.

- The draft EIS has failed to fully assess water, traffic, and transportation impacts on the City of Falls Church and thus propose mitigation of those potential impacts.

- The draft EIS has failed to adequately address issues of parking overflow in the residential areas adjacent to the East and West Falls Church Metro Stations.

- The draft EIS has failed to adequately address public safety and infrastructure issues regarding pedestrian traffic (especially students) conflicting with vehicular
traffic in and around the West Falls Church Metro Station, given the prediction for increased vehicle trips per day.

- The draft EIS has failed to address the environmental impact to surface and ground water as it might affect the City, the City's water distribution system that serves much of the Corridor, and Four Mile Run.

The City of Falls Church understands the legal requirements and the framework of the Environmental Impact Statement, which is to insure that all issues, alternatives and concerns are weighed and evaluated for remedy. In attempting to meet these specific requirements, we believe that mitigation of the Project impact on the City of Falls Church and its immediate surroundings has not been sufficiently addressed. Moreover, given our past history of corresponding on these and similar issues, we continue to believe the City's concerns have not been given full evaluation.

EIS regulations state that the comparative analysis, including the proposed action, is the heart of an EIS (40 CFR 1502.14) and require a rigorous exploration and objective evaluation of reasonable alternatives, including a possible no action alternative. Reasonable alternatives include those that are practical or feasible from a common sense, technical and economic standpoint. Federal regulations (40 CFR 1508.9) recommend that the EIS address environmental impacts in proportion to their potential significance. Impact analysis is intended to concentrate on project attributes that have a significant impact or potential for significant impacts. We contend that this EIS overlooked significant impacts as they relate to the City of Falls Church and its environs.

It is our understanding that the Dulles Corridor Project is a phased regional rapid transit project with planned station facility improvements within the East and West Falls Church Metro Station areas. Given this understanding, we firmly believe this project will have a substantial vehicular traffic impact on the City as the East and West Falls Church Metro Stations transform into a major regional transportation/transit hub in the future. From the outset, the City has been concerned that the Project will bring thousands of additional motorists into the City, and urged that plans must be made to accommodate the additional traffic. In addition, new parking facilities may be needed at either metro station to support the ridership. If these motorists drive to the stations and cannot find parking, they will try to park on the residential streets, creating a significant impact on the surrounding neighborhoods. The City has repeatedly requested that these impacts, and others, be anticipated and addressed.

Our review of the draft EIS indicates that these key concerns have not yet been addressed for the City of Falls Church. The Project, while appearing to be beneficial to the region, has a significant and direct negative impact on the City in a manner not fully analyzed in
the draft EIS. Additionally, we believe the Project has large-scale and complex impacts on the City. We have previously asked that these impacts be thoroughly studied (Attachments 1–4), however, we have now concluded that they have not been given full consideration.

Following our review of the Draft EIS, we are particularly troubled that the impacts to the East Falls Church Metro apparently have never been considered. For this reason, we find the EIS significantly flawed and formally request that this area be examined and fully evaluated.

While a limited analysis was performed for the West Falls Church Metro station, we discovered that project impacts were not considered in many of the Technical Reports including Land Use and Socioeconomic, Air Quality and Economics, and Secondary Development Effects. Although West Falls Church Metro is included in the Noise Technical Report, we are concerned that the full impact has not been analyzed. We believe very strongly that the EIS must be revised to consider impacts in all Technical Reports for both the East and West Falls Church Metro areas. This project impacts our residents' quality of life in a myriad of ways and these impacts must be considered in order to be fully compliant with Federal EIS regulations.

The draft EIS did address one critical area of concern to the City -- Traffic Analysis and Station Access for the West Falls Church Metro area. While it generally addresses some concerns, we believe it falls short in its analysis. Please let me reiterate the City's critical concerns as related to this Technical Report:

- Traffic – The traffic generated by this project will greatly diminish the quality of life of our residents. We asked that the City’s traffic consultant review and analyze the EIS. His comments are attached (Attachment 5). It is of great concern that nineteen (19) separate technical issues were identified as needing to be rectified or clarified. Our consultant states that these “shortcomings, inconsistencies, and concerns/questions are found to be rather troublesome.” In addition to these specific technical issues, it is our view that the traffic impacts were not fully analyzed in four key areas:

  o Assumptions – We believe the assumption that ridership will not increase and the assumption that failing intersections should not be improved is fundamentally flawed. Every projection throughout the EIS shows thousands of anticipated new riders. One of the project’s major goals is to increase ridership and, certainly, at the starting point for the service, additional persons will be traveling to this destination.
Impacts – The traffic impacts are more far reaching than the intersections studied. The City had requested that thirteen (13) key intersections be studied and is disappointed to find only three (3) were considered. The City continues to believe this project may have a significant impact on Falls Church and its environs requiring analyses that would include secondary and cumulative effects of traffic increases through existing neighborhoods. This potential for increased commuter “cut through” traffic needs to be monitored and will require the collection of additional traffic counts.

Equity – The City is more directly impacted than other communities, but these impacts were not analyzed at the same level of detail as the proposed Metro stations. Unlike the planned stations in Tyson’s Corner, the impact of traffic overflow will be felt on adjacent residential streets causing safety concerns for our residents. It is puzzling to then contrast that only the three (3) directly adjacent intersections at the West Falls Church Metro area were analyzed, whereas, for the new stations, as many as nine (9) and an average of five (5) adjacent intersections were analyzed.

Mitigation measures – Table 6.2-6, “Summary of Traffic Issues and Proposed Mitigation Measures,” does not address or consider Falls Church traffic issues or propose mitigation measures.

Parking – The pressure for Metro parking on the City’s residential streets is extreme at present. We are finding that permit parking or time restrictions simply moves the parking further out into other City neighborhoods impacting more and more residents constantly.

Assumptions – The assumption that parking needs will not increase is flawed. The recently announced potential addition of 1,000 parking spaces at the West Falls Church Metro area clearly indicated parking needs are greater than stated in the report.

Impacts – Parking studies are needed for both the East and West Falls Church Metro areas.

Equity – The City and its environs have more residential streets impacted than any other locality, but no consideration was given to how parking will be handled on those streets.
• **Public Safety/Infrastructure** – The City is unique in that the West Falls Church Metro area is directly adjacent to City owned property, which includes the George Mason Middle and High Schools, as well as the UVA/Virginia Tech Grad Center.

  o **Assumptions** – The assumption that failing roadways should accommodate more traffic without improvements is flawed. One of the major goals of the Project is to support future development. However, in reality, the Project may actually prohibit such future development in the area and severely limit the City’s future economic development potential because existing roads are now operating at near or full traffic capacity.

  o **Impacts** - It is troubling that little consideration was given to pedestrian improvements as a significant number of young people traverse this area due to the proximity of schools. We see pedestrian and vehicular conflicts increasing as enrollments and car trips increase in this small geographic area. There are no plans for widening either US 29 or VA Route 7 within the City and the City's Adopted Comprehensive Plan and Streetscape Plan do not recommend any future street widening in the City. As a result, the existing streets will have to accommodate any increased vehicular traffic.

  o **Equity** – Public safety and infrastructure improvements are included in the EIS recommendations for many other impacted areas, but not for the City of Falls Church.

  o **Water** – The Draft EIS addresses possible impacts to surface and ground water. Section 4.1.5.2 acknowledges the possibility of ground water degradation from contaminates, but the ground water study does not address Falls Church ground water. Furthermore, the inventory of surface water sources that might be negatively impacted within the watershed of the affected Project area omits the Four Mile Run and its tributaries. This is a significant omission that must be addressed. Additionally, Section 4.1.3.2 addresses consideration of Fairfax and Loudoun County public water and waste water systems, but omits consideration of possible impact to the Falls Church water system, which not only serves Falls Church City but also a substantial portion of the Project area. This omission is very significant and must be addressed by analyzing possible impacts and proposing mitigation measures.

  o **Social effects** – The Draft EIS at Section 3.0 addresses social effects of the proposed Project. It attempts to analyze and identify potential effects on each of the affected communities and their services and facilities. The
document, at Section 3.2, states that the section includes consideration of schools. However, the potential impact upon the Falls Church City Public School system, due to the close proximity of the Project and the attendant traffic and safety concerns, is completely omitted. This is another significant oversight that must be addressed.

Overall, we strongly believe the Draft EIS' lack of full analysis could prove disastrous for the City, the surrounding neighborhoods and our educational structures. Moreover, we suspect there may be a tremendous safety concern if proper evaluations are not conducted. We believe our neighborhood streets will be inundated with motor vehicles and the project will be considered a failure. Existing infrastructures will be adversely affected and must be effectively remedied by operational plans and new facilities.

Finally, it is our position that there is still much work to do in order for the Draft EIS to address the long-range concerns that have been previously raised by the City, including the safety concerns that continue to be paramount in the minds of our citizens, and which have not yet been studied, let alone, resolved. While we may be critical of the EIS, we remain firmly committed to public transportation and recognize and accept that it is critical to the elimination of air pollution, minimization of vehicular transportation on city streets and in our neighborhoods. Towards this end, Section 10.3 of the Draft EIS, entitled "Issues to be Resolved,” should be amended to include the Falls Church City issues raised herein.

The City Council and I would appreciate your careful review and attention to these Falls Church issues. We further request that you initiate timely and appropriate analyses regarding those issues that will most directly impact the City of Falls Church and its environs. The City Council extends its appreciation to the FTA, DRPT and WMATA for its leadership in this critical transportation and transit planning for Northern Virginia. Please contact Council Member David Snyder, who serves on the Northern Virginia Transportation Commission (NVTC), Transportation Coordinating Council of Northern Virginia (TCC) and National Capital Regional Transportation Planning Board (TPB), at 202-828-7161 or Daniel McKeever, City Manager, at 703-248-5004 with any questions and responses.

Sincerely,

[Signature]

Daniel E. Gardner, Mayor

cc:   Honorable Members of the Falls Church City Council
      Congressman Frank R. Wolf
      Congressman James Moran
Mr. Corey W. Hill
Northern Virginia Regional Manager
Virginia Department of Rail and
Public Transportation
July 30, 2002
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Senator Mary Margaret Whipple
Delegate James M. Scott
Whittington W. Clement, Secretary of Transportation (Virginia)
Katherine K. Hanley, Fairfax County Board of Supervisors Chair
Chris Zimmerman, Arlington County Board Chair

Attachments
January 8, 2001

Mr. Karl A. Rohrer, AICP  
Project Manager, Northern Virginia Office  
Virginia Department of Rail and Public Transportation  
1550 Wilson Boulevard, Suite 300  
Arlington, Virginia 22209

Ref:  Scope of Work for VDRPT Comprehensive Transportation/Traffic Management Plan Assistance  
– Dulles Corridor Rapid Transit Project

Dear Mr. Rohrer:

Thank you for meeting with the City’s team on November 1, 2000 to discuss the impact of the Dulles Corridor Rapid Transit Project. In accordance with our discussion relating to the scope of the Dulles Corridor Rapid Transit Project study and the effort to mitigate the impact of the project, the City requests your assistance in developing a comprehensive traffic management plan for the City of Falls Church and vicinity. This is based on the need to evaluate potential transportation issues as Falls Church emerges as a regional transportation hub in the future. Of the numerous future planned roadway and transit improvements that will converge in the Falls Church area the Dulles Corridor Rapid Transit Project will be one of the first with a terminus involving both the West Falls Church and East Falls Church Metro Stations and vicinity. While mobility of travelers in the Dulles Corridor and around the region will be significantly improved these new station terminus points in the vicinity of Falls Church will impact the city dramatically in the future. A comprehensive transportation study and plan is needed to effectively coordinate and address future regional mass transit linkages, inter-modal facilities, impact of increased local vehicle traffic/congestion, parking needs/deficiencies, safety and land use issues.

The following is some background information that details the City’s need and efforts to date to secure transportation planning assistance.
Basis for Comprehensive Traffic Management Study/Plan:

Several recent local mixed-use development projects have suggested the need to do a comprehensive study and to create a plan for traffic management and calming in the City in order to address potential adverse traffic impacts of larger scale developments. However, of even more significance are the various current regional transit plans and projects including the Dulles Corridor Project, a phased regional rapid transit project with planned station facilities within the East and West Falls Church Metro Station areas, that will have an even more substantial vehicular traffic impact on the City as it transforms into a major regional transportation/transit hub in the future.

The initial phases of the planned regional Dulles Corridor mass transit project will include the provision of express bus rapid transit (BRT) from the West Falls Church Metro Station to Dulles Airport. The subsequent phases of this project will provide a rail link from the East Falls Church Metro Station to Dulles and possibly a rail link from one of the metro stations to Springfield. These changes could potentially bring thousands of additional motorists into the City, and thus some plans must be made to accommodate the additional traffic. In addition, new parking facilities may be needed at either metro station to support the ridership. If these motorists drive to the stations and cannot find parking, they may try to park on the residential streets, creating a significant impact on the surrounding neighborhoods. This issue must also be anticipated and addressed.

The combination of the planned BRT/Metro transit linkages suggests that initial portions of a comprehensive traffic management study and plan should be completed using funds earmarked for the Dulles Corridor Transit Project to whatever extent is possible. The initial phases of the study should be comprised of the following; 1) a thorough analysis of existing conditions on residential and commercial streets, which could require a large data collection and analysis effort to include traffic volumes, speed, street designs, traffic light signalization, and an analysis of pedestrian, bicycle, and mass transit facilities. 2) to develop projections regarding the potential increases in traffic generation due to the BRT/Metro link, proposed redevelopment projects, and other developments, and the impacts of those increases on both commercial and residential streets, as well as on pedestrians, cyclists and mass transit riders; and 3) a plan, which would include recommendations for mitigating current and future potential traffic impacts on the City's transportation system and residents through a variety of means. The City could then use results of this initial study and plan along with its baseline data to complete the final phases of a comprehensive traffic management plan. The recently adopted 2020 Northern Virginia Transportation Plan, the currently ongoing Dulles Corridor Rapid Transit Project NEPA and PE studies and other general regional traffic data collection and modeling by the Virginia Department of transportation (VDOT) should provide much of the data needed to address the Falls Church study area.
The following is a statement of goals and objectives for the Study/Plan and specific expectations for deliverables.

**Goals and Objectives of Study/Plan**

**GOAL: To maintain the quality of life within the City as the new BRT and rail links to the City’s Metro stations and as new development occurs in and around the City.**

- To ensure safety on residential streets, controlling parking and the speed and volume of traffic on them.

- To ensure efficient traffic movement into and within the City on primary streets with minimum impacts on existing Level of Service (LOS).

- To provide as many non-vehicular (pedestrian, bicycle, and mass transit) safe, convenient, and integrated transportation options as possible to move people into and within the City and to mass transit facilities.

- To create a small model of multimodal/intermodal efficiency that might be replicated in other areas of the Country.

**Expected Deliverables for Project**

- A comprehensive inventory and assessment of existing transportation facilities, parking facilities, and traffic conditions in the City -- vehicular and non-vehicular (pedestrian, bicycle, and mass transit). This should also note deficiencies.

- A review of the existing transportation systems in Arlington and Fairfax Counties and previously developed regional transportation plans.

- A forecast of traffic, travel, and parking demand as a result of (a) the BRT, (2) future rail links to metro, (3) future anticipated development within and near the City, (4) the above scenarios if HOV does not exist on I-66, and (5) the above scenarios if HOV begins at Route 29 instead of the Beltway.
Please review the City's proposal and contact me to set up a meeting to confirm the scope of the study and associated timelines.

Sincerely,

[Signature]

Daniel E. McKeever
City Manager

cc: Mayor Daniel E. Gardner and Members of the City Council
Willie Best, Assistant City Manager
Roy B. Thorpe, Jr., City Attorney
General Managers
Gary Fuller, Principal Planner
Fred Seldon, Director Planning Fairfax County
August 9, 2000

Mr. Len Alfredson, P.E. Project Manager
Dulles Corridor Transit Project
1550 Wilson Boulevard
Suite 300
Arlington, Virginia 22209

Dear Mr. Alfredson:

The City of Falls Church appreciates the opportunity to review and comment on the Dulles Corridor Rapid Transit Project and its scope of work for the environmental impact study under the PE/NEPA process. The City Council and I support the continued evaluation and refinement of alternatives to provide proposed transit improvements in the Dulles Corridor, Tyson’s Corner and Falls Church areas, which would serve as the easternmost terminus of the new proposed transit corridor. We also appreciate your taking time from your busy schedule to brief us on the project at the Council Work Session on July 31st.

We believe this project will have a significant impact on the City requiring environmental analyses that would include — secondary and cumulative effects; transportation and traffic; land use, zoning and economic development; land acquisition, displacements and relocation of existing uses; neighborhoods and communities. Other key PE/NEPA objectives include financial analyses of funding sources for project capital, operating and maintenance costs and engineering analyses of possible alternative alignments.

On behalf of the City Council I request that the Federal Transit Administration (FTA), Virginia Department of Rail and Public Transportation (DRPT) and the Washington Metropolitan Area Transit Authority (WMATA) carefully review and consider our comments and initiate appropriate action and analyses to address these issues. Allow me first to provide some important contextual background.

Background:

- The City is not planning any future widening of US 29 or VA Route 7 (within the City) and will work to maintain the character of these roadways. US 29 currently carries 31,000 vehicles per day and VA Route 7 35,000 vehicles per day through the City.

- The City’s Adopted Comprehensive Plan and Streetscape Plan does not recommend any future street widening in the City, and as a result the existing streets will have to accommodate any increased vehicular traffic.

- The City and School Board are major landowners in the vicinity of the West Falls Church Metrorail Station, as they own the Virginia Tech/University of Virginia Graduate Center (City leased land to universities) and George Mason Middle/High School properties. The City is also encouraging the redevelopment of a large area of land (Gordon Road Triangle area) within two blocks of the West Falls Church Metrorail Station.
City and Regional Roadway Impacts:

- Establishing BRT at the West Falls Church Station and full rail service at the East Falls Church Station intensifies the need for a transportation/traffic management and impact study for the City to evaluate potential impacts and develop appropriate mitigation measures. This point is made more clear by the projection of 48 buses during the peak hour can be accommodated at the West Falls Church station during the BRT phase of the project. A traffic impact study for the West Falls Church area needs to be an integral part of the analysis for this project.

- Establishing BRT at the West Falls Church station, and full rail at the East Falls Church station without taking into consideration the traffic impacts along the Route 7 corridor from Falls Church to Tyson’s Corner is shortsighted. The project must consider the impact of the BRT through this corridor as well as any projected changes in traffic volume that may occur as a result of project providing access to Dulles from the Falls Church and Tyson’s Corner areas. In addition, the study must consider relieving US 50 of its prohibition against truck traffic as a way to relieve VA Route 7 of this traffic traveling through the City of Falls Church.

- What alternatives are available to mitigate traffic bottlenecks in the City due to increased vehicle trips on vicinity roads of traffic through the City to and from the East Falls Church and West Falls Church stations as transit ridership increases? Without this information WMATA is doing a disservice to this process and in particular, to those commuters who use Route 7 from Baileys Crossroads to Tyson’s Corner. It is not logical to conclude the majority of riders to Dulles will be riders who are already on the system.

- What measures will be taken to protect City residential neighborhoods from increased commuter traffic? WMATA should consider alternatives that rely on off-site parking facilities and shuttles to the East and West Falls Church station that would relieve city streets from a large part of this traffic leaving it to shuttles. The City would like to play a part, if not a partner, in this analysis and ultimately discussions of potential solutions and sites.

Transit Improvements:

- WMATA should consider utilizing the both the West Falls Church and East Falls Church stations for the BRT. By utilizing the East Falls Church station the project invests its time, analysis and money in the station that will ultimately support the full rail service thereby dissipating some of the traffic and transportation impacts along Route 7 and on local roadways around the West Falls Church station. This would obviously entail close coordination with Arlington County.

- Analyze all currently proposed and alternative mass transit improvement options (i.e., impact, benefits, physical constraints), including light rail alternatives as proposed in the 1999 Northern Virginia 2020 Transportation Plan. The project should also consider linkages between certain nodes along this light rail, from Baileys Crossroads through Falls Church, to the Station that will best provide efficient access and service to Dulles. These linkages might be light rail, bus, or electric bus.

- Additional studies are needed to evaluate alternatives for increased parking at or near the West and East Falls Church Metrorail Stations. WMATA representatives have advised the City that a study is planned for the West Falls Church Metrorail Station, but a study is also needed for the East Falls Church Metrorail Station.

Financing Strategies:

- Explore public/private partnerships for alternative funding of transit improvements as opposed to seeking local subsidies.

- Take steps to insure that project costs that project limited benefits to one jurisdiction only, do not become financial obligations of another jurisdiction.
Carefully consider the impacts from Special Taxing Districts. There will be strong opposition to any tax proposal especially if the DCRT project does not provide the City with additional economic development opportunities.

**Land Use:**

- Consider carefully improvements that may have cumulative and secondary impacts related to changes in future land regulations and requirements. There are clear differences in land use opportunities associated with the project. Falls Church City, which is fully built out, will be impacted very differently than areas in Fairfax and Loudon Counties. Fairfax and Loudon have the opportunity to plan their land use and its impacts, while we here in Falls Church must deal with the impacts of the project as it relates to the current use of the land.

**Other Issues:**

- WMATA needs to consider, if not fully study and analyze, the impact on the City (traffic, noise, parking, etc.) from extended operating hours of Dulles Airport. The early and extended hours of operation of Dulles Airport may conflict with normal commuting patterns or, more importantly, extend the length of time the City’s transportation network is impacted by the increased traffic volume.

- The City of Falls Church and Fairfax County will be working together to review, evaluate and address future land use issues, impacts and opportunities in the West Falls Church Metrorail Station vicinity.

- The City will also be working closely with Arlington County on those issues related to the East Falls Church stations and nearby commercial and residential sections of the City.

- It is critically important the City of Falls Church be specifically included in the EIS portion of the project and, more importantly, be fully included in any and all traffic and transportation studies and/or analysis conducted for this project.

The City Council and I would appreciate your careful review and attention to these issues and to initiate timely appropriate analyses regarding those issues that will most certainly affect the Falls Church and its environs. The City Council extends its appreciation to the FTA, DRPT and WMATA for their leadership in this critical transportation and transit planning for Northern Virginia. Please contact David Snyder, Council member, who is on regional transportation boards that include the Northern Virginia Transportation Commission (NVTC), Transportation Coordinating Council of Northern Virginia (TCC) and National Capital Regional Transportation Planning Board (TPB), at 202-828-7161 or Daniel McKeever, City Manager at 703-248-5004 with any questions and responses.

Sincerely,

Daniel E. Gardner, Mayor

cc: Honorable Member of the Falls Church City Council
    Senator Mary Margaret Whipple
    Delegate Robert D. Hull
    Shirley Ybarra, Secretary of Transportation (Virginia)
    Katherine K. Hanley, Fairfax County Board of Supervisors Chair
    Barbara A. Favola, Arlington County Board of Supervisors Chair
July 31, 2000 (edited 7/27/00)

Mr. Len Alfredson, P.E. Project Manager  
Dulles Corridor Transit Project  
1550 Wilson Boulevard  
Suite 300  
Arlington, Virginia 22209

Dear Mr. Alfredson:

The City of Falls Church appreciates the opportunity to review and comment on the Dulles Corridor Rapid Transit Project and its scope of work for the environmental impact study under the PE/NEPA process. The City Council and I support the continued evaluation and refinement of alternatives to provide proposed transit improvements in the Dulles Corridor, Tysons Corner and Falls Church areas, which would serve as the easternmost terminus of the new proposed transit corridor.

I believe this project will have a significant impact on the City requiring environmental analyses that would include secondary and cumulative effects; transportation and traffic; land use, zoning and economic development; land acquisition, displacements and relocation of existing uses; neighborhoods and communities. Other key PE/NEPA objectives include financial analyses of funding sources for project capital, operating and maintenance costs and engineering analyses of possible alternative alignments.

On behalf of the City Council I request that the Federal Transit Administration (FTA), Virginia Department of Rail and Public Transportation (DRPT) and the Washington Metropolitan Area Transit Authority (WMATA) carefully review and consider our comments and initiate appropriate action and analyses to address these issues. Allow me first to provide some important contextual background.

Background:

- The City is not planning any future widening of either US 29 or VA Route 7 and will work to maintain the character of these roadways.

- The City’s Adopted Comprehensive Plan and Streetscape Plan does not recommend any future street widening in the City, and as a result the existing streets will have to accommodate any increased vehicular traffic.

- The City and School Board are major landowners in the vicinity of the West Falls Church Metrorail Station, as they own the Virginia Tech/University of Virginia Graduate Center (City leased land to universities) and George Mason Middle/High School properties. The City is also encouraging the redevelopment of a large area of land (Gordon Road Triangle area) within two blocks of the West Falls Church Metrorail Station.
City Roadway Impacts:

- Establishing BRT at the West Falls Church Station and full rail service at the East Falls Church Station intensifies the need for a transportation/traffic management and impact study for the City to evaluate potential impacts and develop appropriate mitigation measures. This study is needed to effectively coordinate and address mass transit linkages and local traffic, parking, safety and land use issues.

- What alternatives are available to mitigate traffic bottlenecking in the City due to increased vehicle trips on vicinity roads of traffic through the City to and from the East Falls Church and West Falls Church metrorail stations as transit ridership increases? WMATA needs to be prepared to study increased day trips to both of these stations. It is not logical to conclude the majority of riders to Dulles will be riders who are already on the system.

- What measures will be taken to protect City residential neighborhoods from increased commuter traffic?

Transit Improvements:

- Analyze all currently proposed and alternative mass transit improvement options (i.e. impact, benefits, physical constraints), including light rail alternatives as proposed in the 1999 Northern Virginia 2020 Transportation Plan.

- Additional studies are needed to evaluate alternatives for increased parking at or near the West and East Falls Church Metrorail Stations. WMATA representatives have advised the City that a study is planned for the West Falls Church Metrorail Station, but a study is also needed for the East Falls Church Metrorail Station.

Financing Strategies:

- Explore public/private partnerships for alternative funding of transit improvements as opposed to seeking local subsidies.

- Take steps to insure that project costs that are incidental only to a particular jurisdiction, do not become the obligation of any other jurisdiction.

- Carefully consider the impacts from Special Taxing Districts. There will be strong opposition to any tax proposal especially if the DCRT project does not provide the City with additional economic development opportunities.

Land Use:

- Consider carefully improvements that may have cumulative and secondary impacts related to changes in future land regulations and requirements.
Other Issues:

- WMATA needs to consider, if not fully study and analyze, the impact on the City (traffic, noise, parking, etc.) from extended operating hours of Dulles Airport. The early and extended hours of operation of Dulles Airport may conflict with normal commuting patterns or, more importantly, extend the length of time the City’s transportation network is impacted by the increased traffic volume.

- The City of Falls Church and Fairfax County will be working together to review, evaluate and address future land use issues, impacts and opportunities in the West Falls Church Metrorail Station vicinity.

The City Council and I would appreciate your careful review and attention to these issues and to initiate appropriate analyses as they may affect the City and its environs. The City Council extends its appreciation to the FTA, DRPT and WMATA for their leadership in this critical transportation and transit planning for Northern Virginia. Please contact David Snyder, Council member, who is on regional transportation boards that include the Northern Virginia Transportation Commission (NVTC), Transportation Coordinating Council of Northern Virginia (TCC) and National Capital Regional Transportation Planning Board (TPB), at 202-828-7161 or Daniel McKeever, City Manager at 703-248-5004 with any questions and responses.

Very truly yours,

Daniel E. Gardner, Mayor

cc: Honorable Member of the Falls Church City Council
   Senator Mary Margaret Whipple
   Delegate Robert D. Hull
   Shirley Ybarra, Secretary of Transportation (Virginia)
   Katherine K. Hanley, Fairfax County Board of Supervisors Chair
   Barbara A. Favola, Arlington County Board of Supervisors Chair
December 17, 1999

Mr. Leo J. Bevon, Director  
Virginia Department of Rail and Public Transportation  
1401 East Broad Street  
Richmond, Virginia 23219

Dear Mr. Bevon:

I wanted to take a moment to update you on the City’s efforts to seek transportation planning assistance in developing a comprehensive traffic management study plan for the City of Falls Church and vicinity. This is based on the need to evaluate potential transportation issues as Falls Church emerges as a regional transportation hub in the future. The numerous future planned roadway and transit improvements including the Dulles Corridor Rapid transit project that will converge at the West Falls Church Metro Station and vicinity will impact Falls Church dramatically in the future. A comprehensive transportation study and plan is needed to effectively coordinate and address regional mass transit linkages and local traffic, parking, safety and land use issues.

The announcement at the December 7, 1999 meeting of the Dulles Corridor Task Force to fund a transportation planner for Fairfax County was of particular interest to the City and myself. As you may be aware the previous City Manager, Hector Rivera had been pursuing for almost a year through the Commonwealth of Virginia Secretary of Transportation and Virginia Department of Transportation (VDOT) funding for a similar transportation planner/engineer position. This grant based City staff position or VDOT assistance would involve work on a variety of transportation management, traffic and land use issues. Currently the City does not have either a transportation planner or transportation engineer on staff.

I have included some background information for your review that details the City’s efforts to date to secure transportation planning assistance. I will call you so we can plan to have lunch soon to discuss the City’s interests and what assistance may be available now and in the future. I also can be reached at (202) 828-7161 (work).

Very truly yours,

David Snyder

Mayor, David Snyder
June 29, 2002

Mr. Samer S. Beidas, P.E., CCM
General Manager, City of Falls Church
300 Park Avenue
Falls Church, Virginia 22046-3332

RE: Dulles Corridor Transit Project – Draft EIS
SUBJ: Impact Evaluation
City of Falls Church, Virginia

Dear Mr. Beidas:

I am pleased to provide the following “Impact Evaluation” for the referenced draft EIS report dated January 28, 2002 (including revised Section 8.0 dated March 15, 2002). This brief evaluation reviews this EIS report in consideration of possible impacts to the City of Falls Church, particularly the affected Metrorail stations and environs with the City of Falls Church. Based on my evaluation of this report (and revised Section 8.0 attachment), I offer the following observations and comments (presented in order by Section of the EIS report):

Section
Section 1.0 -- No comment.
Section 2.2 -- It is noted that the BRT alternative includes modification to the West Falls Church Metro Station.
Section 3 -- No comment.
Section 4 -- No comment.

Figure 5-1 — At the Haycock Rd./Falls Reach Drive intersection, it is shown that the predominant AM inbound flow is from Great Falls Street, yet the predominant PM outbound flow is to the other direction (towards Rt.7). This is a curious traffic pattern where the predominant outbound trips (from West Falls Church Metro Station) are opposite of the predominant inbound trips. This should be explained further.

Figure 5-17 — At the Haycock Rd./Falls Reach Drive intersection, there are “movements” going into an unmarked road opposite Falls Reach Drive. Perhaps this unmarked road is one-way, yet nothing is shown on this graphic. This should be explained further.

Section 5.3.2 — Roadway analysis was performed for eight (8) roadway segments, not including Rt.7 near Falls Church (e.g., near Haycock Road). Why not? It seems this important eastern end of the study area should have been included.

Section 6.1 — Level Of Service (LOS) analyses were conducted for selected highway links, but not Rt.7. Why not? Again, it seems this important highway corridor within the study area should have been included.

Section 7.1 — A general statement is made that “… traffic impacts within the Orange Line Connection subarea of the corridor are not expected to be significant.” On what basis is this general statement made? On what proof or evidence can this be made?
Section 7.1 – It is stated that “...no formal analysis of park/kiss-and-ride entries and exits or the nearby local road network was undertaken for the East Falls Church metro station area...” due to insignificant increase in traffic near the station, yet it is also stated that “...implementation of either the Metrorail or BRT/Metrorail Alternative would result in increased off-peak service frequencies at East Falls Church for eastbound trains...” These statements seem contradictory. An explanation of how increased off-peak service creates no significant increase in traffic near the affected station needs to be clarified.

Section 8.2 (March 15, 2002) – It is stated that none of the planned changes to the West Falls Church Metro station are assumed in the analysis, yet no explanation is provided as to why? Also, isn’t a parking garage being planned/programmed for this station? If so, why isn’t this included in the analysis?

Table 8-1 (March 15, 2002) – This table shows exactly the same LOS and delay for the Rt.7/Haycock Rd. and Haycock Rd./West Falls Church Station Parking Entrance intersections during the AM and PM peak hours for the 2025 Baseline condition. It is highly unlikely that this coincidence would occur. This needs to be checked and verified.

Section 8.3.1 (March 15, 2002) – Under the “BRT Alternative” it is stated twice that the Rt.7/Haycock Rd. intersection would improve to LOS C in the PM peak hour. I believe that this applies to the AM peak hour as well (per Table 8-1).

Section 8.3.1 (March 15, 2002) – Under the “BRT Alternative” it is stated that “...any of the build alternatives would reduce the demand for parking at the West Falls Church Station ...”, yet no evidence is presented to support this finding.

Section 8.3.2 (March 15, 2002) – It is stated here that “...only selected intersections and station entrances/exits are analyzed.” It is curious why the most impacted intersection in the West Falls Church Metro Station area (Great Falls Rd./Haycock Rd. intersection) was not part of the analysis.

Section 8.3.2 (March 15, 2002) – It is stated here that “...because it is the controlling time period for the design year, only the PM peak hour conditions have been analyzed...” Since the area near the West Falls Church Metro Station (i.e., Rt.7/Haycock Rd. intersection area) is directly influenced by the adjacent educational facilities, thus directly and strongly influenced during the AM peak hour much more than the PM peak hour, it is questionable why only the PM peak hour was analyzed, and not the AM peak hour.

Section 8.5 (March 15, 2002) – It is stated that since “...the project is not anticipated to have a negative impact on adjacent intersections, analysis of pedestrian and bicycle access and circulation was not undertaken.” In light of prior comments and uncertainties, it is not necessarily factual that no negative impact has been afforded at adjacent intersections, thus perhaps pedestrian and bicycle access and circulation should be conducted.

Section 8.6 (March 15, 2002) – It is claimed that the measured “delay” impact is not significant enough to warrant mitigation. Under what criteria is this based? This seems to be objective.

Figure 8-1 (March 15, 2002) – The predominate PM peak hour traffic flow out of Falls Reach Drive is contrary to that shown in Figure 5-1. Which is correct?

Section 22.0 – It is noted that the study only accesses the potential effects of development near the Tysons Corner and Mid-Corridor areas. Apparently no development is forecast near the Falls Church Metro Stations. This needs to be verified with the City.
Section 22.2 – It is noted that “... the increase in traffic attributable to the rail development-related forecasts represent area-wide impacts.” It is curious whether these area-wide impacts reach to Falls Church Metro Station areas.

Section 22.2 – The final paragraph of the report states that development will result in increased ridership and also attract additional traffic to adjacent roadways. Does this apply to roadways near the Falls Church Metro Stations? This needs to be clarified.

All in all, I find the report rather comprehensive and well done – mostly within standard methodologies and criteria. However, I do note and find some of the above-identified shortcomings, inconsistencies, and concerns/questions to be rather troublesome, which should be rectified and/or clarified.

I trust that this evaluation provides you with the information requested. Please feel free to call me if you should have any questions.

Respectfully Submitted,

VETTRA Company

Vernon E. Torney
Vernon E. Torney, AICP
Certified Planner # 8543
President

cc:

\lceval8_eis.doc
MEMORANDUM

DATE: June 25, 1999

TO: Hector A. Rivera, City Manager

FROM: Helen Reinecke-Wilt, Senior Planner
Wayne French, Director, Public Works Division
Samer Beidas, City Engineer
Harry Reitze, Captain, Falls Church City Police
Jim Gahres, Economic Development Authority Deputy Director
Halsey Green, Director, Finance Division
Otis Smith, Assistant to the City Manager

SUBJECT: Scope of Work for VDOT Transportation Management Plan Assistance

Basis for Comprehensive Traffic Management Study/Plan:

Several projects have suggested the need to do a comprehensive study and to create a plan for traffic management and calming in the City. These include recent plans for a two stage regional mass transit project, which will impact the East and West Falls Church Metro Stations: the City’s Comprehensive Plan; and TR99-11, an add-on to the adopted Mixed-Use Redevelopment (MUR) Ordinance.

The first phase of the planned regional mass transit project will provide bus rapid transit (BRT) from the West Falls Church Metro Station to Dulles Airport. The second phase of this project will provide a rail link from the East Falls Church Metro Station to Dulles and possibly a rail link from one of the metro stations to Springfield. These changes could potentially bring thousands of additional motorists into the City, and thus some plans must be made to accommodate the additional traffic. In addition, no new parking facilities are proposed at either metro station to support the ridership. If these motorists drive to the stations and cannot find parking, they may try to park on the residential streets, creating a significant impact on the surrounding neighborhoods. This issue must also be anticipated and addressed.

A second purpose for this study/plan lies within the City’s Comprehensive Plan, adopted in November 1997. This plan recommends that the City create a comprehensive traffic-calming
plan due to the constant complaints by residents about vehicular speeding and traffic volume on residential streets during the past 10 years or so. After several years of being asked to consider piecemeal traffic problems, the City’s Transportation Committee realized that a comprehensive plan to address these issues was necessary to insure safety and efficient traffic flow for vehicular and non-vehicular traffic throughout the City. The new BRT and rail link proposal will compound the City’s existing traffic problems.

TR99-11, a resolution in support of sustainable development in the Mixed-Use Redevelopment (MUR) areas, was adopted by the City Council along with the MUR Ordinance on March 8, 1999 (See attachment). This resolution stated that a variety of actions should take place as soon as possible. One of these actions is transportation and parking study to determine the potential impacts of fully developed MUR areas on both the residential neighborhoods and commercial districts. It also called for recommendations on how the additional traffic could be accommodated.

The combination of the BRT/Metro link, the Comprehensive Plan, and the associated MUR resolution suggests that a comprehensive study and plan should be completed using the VDOT grant-based staffing to whatever extent is possible. This study should be comprised of a thorough analysis of existing conditions on residential and commercial streets, which could require a large data collection and analysis effort to include traffic volumes, speed, street designs, traffic light signalization, and an analysis of pedestrian, bicycle, and mass transit facilities. The second phase of the study should be to project the potential increases in traffic generation due to the BRT/Metro link, MUR projects, and other developments, and the impacts of those increases on both commercial and residential streets, as well as on pedestrians, cyclists, and mass transit riders. The third and final phase should be a plan, which would include recommendations for mitigating current and future potential traffic impacts on the City’s transportation system and residents through a variety of means. This should include recommendations for a variety of traffic calming measures on residential street; recommendations for improvements to pedestrian and bicycle facilities; as well as recommendations for the efficient utilization of other alternative modes of transportation. Transportation demand management techniques for new businesses such as carpooling, shuttles to metro, and employee mass transit cost-sharing should also be considered amongst the recommendations. This plan must be comprehensive in terms of both the physical or built environment and human element. The safety of vehicles and pedestrians and a peaceful environment for residents must be maintained.

The following is a statement of goals and objectives for the Study/Plan and specific expectations for deliverables.

Goals and Objectives of Study/Plan

GOAL: To maintain the quality of life within the City as the new BRT and rail links to the City’s Metro stations and as new development occurs in and around the City.
• To ensure safety on residential streets, controlling parking and the speed and volume of traffic on them.

• To ensure efficient traffic movement into and within the City on primary streets with minimum impacts on existing Level of Service (LOS).

• To provide as many non-vehicular (pedestrian, bicycle, and mass transit) safe, convenient, and integrated transportation options as possible to move people into and within the City and to mass transit facilities.

• To create a small model of multimodal/intermodal efficiency that might be replicated in other areas of the Country.

Expected Deliverables for Project

• A comprehensive inventory and assessment of existing transportation facilities, parking facilities, and traffic conditions in the City -- vehicular and non-vehicular (pedestrian, bicycle, and mass transit). This should also note deficiencies.

• A review of the existing transportation systems in Arlington and Fairfax Counties and previously developed regional transportation plans.

• A forecast of traffic, travel, and parking demand as a result of (a) the BRT, (2) future rail links to metro, (3) future anticipated development within and near the City, (4) the above scenarios if HOV does not exist on I-66, and (5) the above scenarios if HOV begins at Route 29 instead of the Beltway.

• An identification of future transportation needs and deficiencies.

• An assessment of the projected impacts on special needs populations, in particular the elderly and physically disabled.

• A comprehensive and workable Transportation Management Plan that includes alternatives for state of the art traffic-calming techniques as well as for each mode of transportation and commensurate parking resources. This Plan must meet the goal and objectives as stated.

• A model that demonstrates this plan.

• An implementation plan.

• Public Information -made available for the City's Web Page.
Project Management Specifics

- A public participation process for the project would be developed by the City. This would include a minimum of at least one Planning Commission and one City Council public hearing and several neighborhood meetings to explain the initial findings of the study and receive input for the plan component.

- The City would have the ability to review and comment on draft recommendations prior to the publication of the final document.

- The City anticipates that this Study/Plan should be completed within six to nine months of the execution of the contract.

- A review of the actual impacts of the BRT should be made within six to nine months of the program's implementation to gauge the accuracy of forecasted impacts and potential readjustments to forecasts for the second rail link phase of the project should be made if necessary. In addition, a review of the actual impacts of the proposed rail links should also be made within six to nine months of implementation.

Attachments:

(1) City of Falls Church Comprehensive Plan, 1997
(2) TR99-11, a Resolution in Support of Sustainable Development in the Mixed-Use Redevelopment (MUR) Areas

cc:
Robert Murray, Chief/Director, Public Safety Division
David Holmes, Director, Economic Development Authority
Ray Spicer, Director, Housing and Human Services Division
Brenda Creel, General Manager, Community Services Department
Son Nguyen, General Manager, Environmental Services Department
Sheila Graham, Communications Director
Willie Best, General Manager, Administrative Services
City of Falls Church
Department of Environmental Services
Division of Public Works
Interoffice Memorandum

To: Hector A. Rivera, City Manager, City of Falls Church
   Otis B. Smith, III, Assistant to the City Manager, City of Falls Church
   Tom Farley, Northern Virginia District, VDOT
   Joanne Sorenson, Northern Virginia District, VDOT
   Reggie Beasley, Urban Division, VDOT, Richmond
   Chris Detmer, Traffic Planning Division, VDOT, Richmond
   Elona Kastenhofer, Traffic Engineering Division, Northern Virginia District, VDOT
   Grady Ketron, Traffic Planning Division, VDOT, Richmond
   Andrea Giberson, Chairwoman, Citizens Advisory Committee on Transportation, City of Falls Church
   David Holmes, Executive Director, Economic Development Authority, City of Falls Church
   Captain Harry W. Reitze, Commander, Uniform Division, City of Falls Church Police Department
   Halsey T. Green, III, Director of Finance, City of Falls Church
   Gary Fuller, Director of Planning, City of Falls Church
   Samer Beidas, City Engineer, City of Falls Church
   Wayne J. French, Director of Public Works, City of Falls Church

From: Wayne J. French, Director of Public Works

Date: 19 May 1999

Subject: REVISED Synopsis of 5/19/99 VDOT Traffic coordination meeting

Pursuant to our discussion, I am providing the following meeting synopsis:

People Present:

VDOT: Tom Farley, Reggie Beasley, Joanne Sorenson, Chris Detmer, Elona Kastenhofer, Grady Ketron

City of Falls Church: Andrea Giberson, Hector Rivera, Otis Smith, David Holmes, Harry Reitze, Halsey Green, Gary Fuller, Samer Beidas, Wayne French

Key Points/Issues:

1. The City presented the historical information to VDOT personnel regarding the City; its issues, problems, concerns, location, and desire to be involved and
considered in any and all future transportation and traffic issues that may have an impact on the City and its citizens.

2. Mr. Fuller gave a historical background as to the City’s desire and need to have traffic studies conducted, including the recently adopted Comprehensive Plan and a recently adopted resolution concerning sustainable development, which mandates the initiation of a traffic and parking study to determine the impacts of the current situation, as well as those created by new developments.

3. Captain Reitze explained the City’s unusual position in regards to emergency response, as the two METRO stations are not in the City, but the City Police are often called to respond to these areas due to our proximity. Also, if the Bus Rapid Transit (BRT) system utilizes West Falls Church as a hub, then the growth in traffic will be almost debilitating. He stressed, as everyone in attendance noted, a regional approach must be taken on these issues.

4. The BRT is the one of the main reasons for the initiation of this cooperative effort and will be key in its success.

5. Mr. Rivera had met with Virginia Secretary of Transportation Shirley Ybarra and requested assistance from her for the funding of a two-year (+/-) transportation engineering position so that the impacts on the City caused by the BRT could be evaluated. This position would also allow the City to assess impacts of development on City and County highways. She expressed a desire to investigate this option based on its link to the BRT. Mr. Rivera then met with Mr. Tom Farley in response to a request to Mr. Farley from the Secretary’s office.

6. The City desires to have other services performed in conjunction with this effort, including, but not limited to, traffic impact studies, level-of-service studies, congestion mitigation recommendations, safety issues, traffic calming, etc.

7. In my conversation with Mr. Beasley, I expressed to him the City’s desire to include the Village Section of West Broad Street for consideration of inclusion in the State’s six-year plan, once funding becomes available in FY01. This could be accomplished by completing the downtown section, which is already on the State’s project list and then including the Village Section with this project. If this is done, and the State constructs the project, the State would pay 98%, the City 2%, of the cost of most of the work, although a portion of the streetscape may be 100% City funding.

DELIVERABLES

1. VDOT will prepare a two or three page Scope of Services to ensure that the needs of all involved are met and will have a draft to Mr. Rivera by 4 June 1999.

2. A final Scope of Services should be finished by the end of June 1999.

3. Reggie Beasley, Urban Division, Richmond, will be the coordinator for this effort to ensure that sufficient resources are assigned and that the project continues. This was done due to the fact the Reggie deals directly with the City, whereas the Northern Virginia Division does not.

4. Once an agreeable scope of services is finished, it will be sent out to bid, possibly with the City being the agent for the effort.

5. A follow-up meeting with Secretary Ybarra, Mr. Farley, and Mr. Rivera would be established to finalize the agreement and establish the payment information and to establish the teams to correspond back and forth on the product.

6. The inclusion of the Village Section (400-900 blocks) of West Broad Street into the existing downtown section of Broad Street for funding and construction by
VDOT in their six-year plan. This would complete the streetscape on all sections of West Broad Street.

Revised 6/2/99
Revised 6/18/99

Cc: VDOT Traffic engineering file
February 4, 1999

The Honorable Shirley Ybarra
Secretary of Transportation
Commonwealth of Virginia
1401 E. Broad Street
Richmond, Virginia 23219

Dear Secretary Ybarra:

I have had the opportunity and privilege to serve on the Dulles Corridor Task Force which is exploring exciting approaches to BRT, funding alternatives, management approaches, etc., in order to realize a bus-rail/combo that would relieve congestion and engender continued development and technological growth. I thank you for the appointment to this important committee and for your sensitivity to local practitioners.

The plans to date reference West Falls Church as a point of expansion and/or origination for this east-west connector. In the future, the same may be true of a future northern connector from Springfield to Falls Church and to D.C. or Dulles. Our city is doing aggressive and "smart" (managed) economic development along our West Broad (Main) Street with Don Beyer of Don Beyer Volvo. We plan to develop a Technology Triangle (across from the Northern Virginia Graduate Center, near George Mason High School), conveniently located near the West Falls Church Metro station. A Marriott Assisted Living facility will be further down on Broad Street. This will be the second Marriott project in our small independent city of 2.2 square miles in the last two years.

We also host the crossroads of Routes 29 and 7 which has the potential to be our future Town Center, and further on East Broad Street we collide into the famous Seven Corners. Route 29, known as Washington Street, is experiencing development, such as, new Falls Church Fire Station and a new State Theater (private sector).
The Honorable Shirley Ybarra  
February 4, 1999  
Page 2 of 2

It would be essential and imperative for the City to conduct traffic impact studies for traffic management purposes and for community sustainability in this highly citizen-interactive community as we move towards a "regional transportation hub." I would ask that you consider a capacity-building grant to allow Falls Church to hire a professional traffic engineer/planner, retain consultants as appropriate, and provide the citizens and developers with the anticipated and possible unanticipated consequences of development. We would be willing to provide a share of in-kind services and cash match. I project that a grant from the Commonwealth to us in the range of $175-200K may be realistic to get the job done systematically and with depth.

Thank you. I remain,

Sincerely,

[Signature]

Hector A. Rivera  
City Manager

HAR:ecr  
cc: Leo J. Bevon, Director  
Department of Rail and Public Transportation  
J. Kenneth Klinge, J.K.K. Associates  
Thomas F. Farley, District Administrator  
Virginia Department of Transportation  
Robert J. O'Neill, County Executive, Fairfax County
K.5.2 Town of Herndon

- December 31, 2003
- August 26, 2002
- April 2, 2002
- August 8, 2000
December 31, 2003

Via Facsimile & US Mail

Mr. Karl Rohrer, Project Manager
Virginia Department of Rail and Public Transportation (VDRPT)
1550 Wilson Boulevard, Suite 300
Arlington, Virginia 22209

Mr. John Dittmeier, P.E., Acting Project Manager
Washington Metropolitan Area Transit Authority (WMATA)
Dulles Corridor Rapid Transit Project
1550 Wilson Boulevard, Suite 300
Arlington, Virginia 22209

Re. PUBLIC HEARING RECORD – Docket R03-6
Town of Herndon comments on the October 2003 Supplemental Draft
Environmental Impact Statement and Proposed General Plans – Revisions
for the Dulles Corridor Rapid Transit Project (DCRTP)

Submission of the Town of Herndon’s Transportation Improvement District
Resolution and Associated Resolutions in support of Metrorail

Dear Messrs. Rohrer and Dittmeier:

On behalf of the Herndon Town Council and the citizens we serve, thank you for the
opportunity to comment on the Supplemental Draft Environmental Impact Statement (EIS) and
Section 4(f) Evaluation and Proposed General Plans – Revisions for the Dulles Corridor Rapid
Transit Project (DCRTP). We are appreciative of the steadfast energy and outstanding
leadership provided by the Virginia Department of Rail and Public Transportation (VDRPT) and
the Washington Metropolitan Area Transportation Authority (WMATA) staff in your efforts to
meet the transit demands and challenges facing the Commonwealth.

On August 13, 2002, the Town Council unanimously passed a resolution recommending
the “Metrorail Alternative” as the Locally Preferred Alternative (LPA). The Town Council views
the near-term implementation of rail transit in the Dulles Corridor as imperative. However, I wish
to express several significant concerns associated with the Supplemental EIS and General Plans
for the Dulles Rail.
1. **PROJECT PHASING.** At the forefront of our concerns is the proposal to construct the project in two phases with the Phase I terminus at Wiehle Avenue. We recognize that the Federal Transit Administration (FTA) is considering only the first phase of construction to Wiehle Avenue for the FY 2004-2009 transportation reauthorization for the primary reason that “the phasing of construction is necessary to spread the costs of construction over a longer period of time to reduce annual funding needs.” The Herndon Town Council is particularly concerned with the EIS statement that “FTA may consider the subsequent phase for FTA funding in the future, but has made no commitment to do so,” and that “FTA has determined that the first phase now being considered for funding has independent transportation utility even if the subsequent phase is never built.”

Moving the terminus for Phase I to Herndon-Monroe is a means to guarantee immediate value for landowners in the western end of the district. Under the current funding and construction phasing proposals, these owners face the possibility of paying taxes to support Phase 1 construction bonds for thirty years or more, even in the event of a failure to get Federal funding for any subsequent phase. Under the best case scenario, these owners would be taxed from 2004 through at least 2015 before seeing any transit facilities in the Herndon area.

We understand the financial and operational realities of the recommended extension as well as the practical difficulties engendered by an alternative proposal to construct rail directly to the Washington Dulles Airport by bypassing a number of planned stations and constructing them in a subsequent phase. While we understand that there is no way to guarantee future Federal funding, we do assert that an equitable tax district structure can be enacted. Current possibilities under discussion include a differential rate for the western portion or a scheme where western funds are escrowed until Phase 2 Federal funding is approved. These funds could be rebated if Federal funding does not materialize.

In short, the proposed phasing scheme provides significant uncertainties for the implementation of a future phase. The Town Council opposes a single tax district, as proposed by the LEADER group, with the phasing scheme that does not extend the system to the Herndon-Monroe Station within the first phase.

Please enter the attached Town Council Resolution 03-G-144 of December 2, 2003 into the public hearing record for the Draft Supplemental EIS. This resolution does support the LPA but conditions Town approval of the Transportation Improvement District on a Phase 1 interim terminus at Herndon-Monroe, as a means to assure rail service to the western part of the Dulles Corridor. The Herndon resolution recommends removing language that would have allowed landowners to veto Phase 2 implementation with one or more failures to obtain federal funding. The resolution also provides for minor adjustments to the boundaries of the tax district within the Town of Herndon.
2. **HERNDON-MONROE STATION NORTH SIDE ACCESS.** The Town commented previously on the minimal nature of the improvements proposed on the north side of the Herndon-Monroe Station. To recap, the Town completed an engineering concept and feasibility study in cooperation with VDRPT as well as other project sponsors, a copy of which was furnished to the project team. On June 12, 2001, the Town Council recommended a preferred access alternative as noted in the attached Resolution. The selected alternative includes pedestrian walkways extending from the station in several directions, with a modal transfer point (Kiss and Ride) for persons arriving by bus, carpool, van-pool, automobile and bicycle. This scheme would maximize transit ridership.

The walkway to Herndon Parkway shown in the General Plans provides basic access. However, are bus stop slips envisioned on Herndon Parkway near the end of the pedestrian walkway? Where do bicyclists store their bicycles? Where do the kiss & ride vehicles wait? How do transit users from nearby office buildings to the east and west reach the northside touchdown? How do transit users from the office buildings north of Herndon Parkway safely cross the four-lane divided roadway? Minimal improvements such as a signalized crosswalk on Herndon Parkway and multiple pedestrian sidewalks would at least fulfill the intent of the project as described on page 6-16, Section 6.2 of the Supplemental Draft EIS.

3. **TRANSPORTATION MITIGATION IMPROVEMENTS.** Two issues should be clarified with regards to Chapter 6 - Transportation Effects, 6.2.3 Transportation Mitigation, Table 6.2.7 presented on page 6-22 and 6-23. Specifically, the table provides a summary of proposed mitigation options to include construction of an additional through lane on the northbound (NB) and southbound (SB) approaches to the westbound (WB) Dulles Toll Road ramp at Fairfax County Parkway and construction of an eastbound (EB) right turn lane onto Herndon Parkway/Van Buren Street intersection. According to the Table 6.2.7, these proposed mitigation measures are required by 2025. We believe that both of the measures are warranted and should be completed prior to the opening of the Herndon-Monroe Rail Station, rather than by 2025. A northbound right turn lane at Van Buren Street and Herndon Parkway is also a critical need prior to the opening of the Herndon Monroe Station.

4. **ROUTE 28/CIT STATION.** The Town supports the accommodation of the overpass as shown in the General Plans for the Route 28 Station, although we had hoped the overpass would be constructed as part of the station project. This new connection will greatly enhance local circulation across the Dulles Toll Road between the Center for Innovative Technology (CIT) and the approved Dulles Center Development. It will enhance station access and an incomplete road network with regards to Rock Hill Road, Horse Pen and other local streets.
Mr. Karl Rohrer, Project Manager, VDRPT
Mr. John Dittmeier, P.E., Acting Project Manager, WMATA
December 31, 2003
Page Four

I would be happy to respond to any questions you may have concerning the Town’s position on these or other matters related to the development of Dulles Rail. On behalf of the Town, I wholeheartedly wish the project team and the congressional delegation continued success in working with Congress and the Federal Transit Administration.

Sincerely,

[Signature]

Richard C. Thoesen
Mayor

Attachments:
Resolution 03-G-144, Adopted December 2, 2003
Resolution 02-G-98, Adopted August 13, 2002
Resolution 01-G-57, Adopted June 12, 2001

c. Members of the Herndon Town Council
Members of the Herndon Planning Commission
Stephen F. Owen, Town Manager
Anthony H. Griffin, County Executive
TOWN OF HERNDON, VIRGINIA

RESOLUTION

DECEMBER 2, 2003

Resolution- Determining if the Town Council Wishes Commercial, Industrial, or Multi-Unit Rental Residential Property in the Town to be Included within the Proposed Dulles Rail Transportation Improvement District.

BE IT RESOLVED by the Council for the Town of Herndon that:

1. The Town Council determines that the Town Council wishes the property in the Town of Herndon, zoned for commercial, industrial, or multi-unit rental residential uses, described in “Petition Pursuant to Virginia Code Section 33.1-431 for the creation of the Dulles Rail Transportation Improvement District” (Petition) dated August 1, 2003, to be included within the proposed Dulles Rail Transportation Improvement District (District), provided the petitioner and the Board of Supervisors of Fairfax County, respectively, make all of the following changes to the Petition and to the proposed and final resolution that creates the District:

   (a) The inclusion in the District of area at the northwest corner of Worldgate Drive and Van Buren Street that includes a sizeable office building.

   (b) The exclusion from the District of the single family residential areas west of commercial parcels that front on Victory Drive.

   (c) The exclusion from the District of the area along the east Elden Street corridor and outside the one mile radius from the Herndon-Monroe Park and Ride Station.

   (d) The extension of the interim terminus of the rail line in Phase I to the Herndon-Monroe Park and Ride Station.

   (e) Modification of Paragraph 4(f) of the Petition by removing the provision dealing with the Full Funding Grant and modifying the first sentence so that the Paragraph would read, in its entirety, “The District would continue to pursue funding for and construction of the remainder of the Transportation Improvements within the District”.

2. In the absence of the petitioner and the Board of Supervisors of Fairfax County making all of the above changes in the Petition and in the proposed resolution and final resolution creating the District, the Town Council determines that the Town Council does not wish such property located within the Town to be included within the proposed District and therefore does not approve such inclusion.
3. The revised District with the changes proposed in paragraph 2 above is described in detail as follows:

The tax district boundary as it extends into the Town from the east along Baron Cameron Avenue (Route 606) would turn southward at the Town’s eastern boundary rather than to the north; thence continuing southward to the W&OD Railroad Regional Park property; turning thence northwest along the park property to the end of the tax map parcel 017-1-02-0022, turning eastward a short distance along the boundary of that parcel and thence northward along the western boundary of parcel 017-1-06-00J4 to a point where it meets Herndon Parkway and continuing northward along Herndon Parkway a short distance; thence crossing Herndon Parkway and continuing west along Grove Street to an unnamed parcel shown on a plat approved April 1, 2003 (recorded at Deed Book 14224, pages 933-945) and being the location for the relocation of H and S Plumbing due to the extension of Grove Street; thence extending southward and westward along that parcel, continuing westward along subdivision 32 and thence northward returning to Grove Street; thence extending westward along Grove Street; turning southward along the eastern boundary of parcel 016-2-02-0191 and westward along the W&OD Railroad Regional Park property to Van Buren Street; thence extending southward along Van Buren Street as it becomes Spring Street; thence extending southeast along Spring Street to the northeast corner of parcel 016-2-02-0173B; thence extending southward along a line formed by that parcel and parcels 016-2-02-0174C and 016-4-02-0010C; thence turning westward along the boundary of subdivision 10 and extending along this subdivision and parcel 016-4-02-0002 (Town of Herndon property) to a point where it meets Herndon Parkway; thence continuing westward along Herndon Parkway a short distance and turning south along parcel 016-4-02-004A; thence continuing south along this parcel to its southwestern corner; thence extending northward along a line formed by subdivision 15 and 14 (Worldgate) and continuing thus within the Town as shown in the Petition.

4. The Mayor, any member of the Town Council, the Town Manager, or the Town Attorney shall deliver a certified copy of this resolution to the Fairfax County Board of Supervisors at or before its public hearing on the Petition on December 8, 2003.

5. This resolution shall be effective on and after the date of adoption.

This is certified to be a true and accurate copy of Resolution 03-G-144 adopted at a legally convened meeting of the Town Council of the Town of Herndon on December 2, 2003.

Viki L. Wellershaus, Town Clerk
TOWN OF HERNDON, VIRGINIA

RESOLUTION

AUGUST 13, 2002

Resolution- Recommending a Locally Preferred Alternative (LPA) and Other Considerations to be Forwarded to the Washington Metropolitan Area Transportation Authority (WMATA), the Virginia Department of Rail and Public Transportation (VDRPT) and the Commonwealth Transportation Board (CTB) as a Response to the Draft Environmental Impact Statement and Proposed General Plans of the Dulles Corridor Rapid Transit Project.

WHEREAS, the public information and public participation meetings were held concerning the Draft Corridor Environmental Impact Statement and Proposed General Plans for the Dulles Corridor Rapid Transit Project on July 29, July 30, and July 31, 2002 at the locations identified in the Notice of Public Hearings for the purpose of identifying issues and concerns of community members and stakeholders likely to be affected by the project, and to describe the purpose of the Study, identify the alternatives, the goals of the Study, and to increase public awareness and to receive citizens comments with regard to the Draft Environmental Impact Statement and Proposed General Plans for the Dulles Corridor Rapid Transit Project which includes Bus Rapid Transit and Metrorail Service in Fairfax and Loudoun Counties, Virginia; and

WHEREAS, the Town of Herndon approved a resolution, dated November 13, 2001, in support of the efforts of Congress and other leaders to expedite the extension of the Metrorail system to Washington Dulles International Airport; and

WHEREAS, the Town of Herndon approved a resolution, dated June 12, 2001, recommending a preferred alternative (Alternative Four) for north-side pedestrian access to the future Herndon-Monroe Transit Station; and

WHEREAS, the Town’s preferred alternative for north-side pedestrian access to the future Herndon-Monroe Transit Station emphasizes a walkway extending from the station to Herndon Parkway, with a modal transfer point for persons arriving by bus, car-pool, van-pool, automobile and bicycle; and

WHEREAS, the Town of Herndon now has the opportunity to recommend a Locally Preferred Alternative (LPA) for the Dulles Corridor Transit Project from among the following alternatives: Baseline (No-Build) Alternative, Bus-Rapid Transit Alternative, Metrorail Alternative, Bus-Rapid Transit / Metrorail Alternative and a Phased Alternative; and

WHEREAS, the Town staff has reviewed and reported on the draft Environmental Impact Statement (EIS) and Proposed General Plans of the Dulles Corridor Rapid Transit Project; and
WHEREAS, by the year 2025, population in the Dulles Corridor is projected to increase by 56 percent, along with a 71 percent increase in jobs, and Dulles Airport, currently serving more than 20 million passengers annually, is projected to serve 32 million passengers by 2010; and

WHEREAS, based on local land use and transportation plans, this population and employment growth will lead to increased congestion on primary and local service roads and a need for additional capacity; and

WHEREAS, evaluation of the Dulles Corridor Study area has found that the corridor cannot accommodate additional highway expansion and therefore rapid rail (Metrorail Alternative) is the only mode of transportation that can provide substantial additional capacity in the corridor to meet future travel demand; and

NOW, THEREFORE, BE IT RESOLVED by the Town Council of the Town of Herndon that the Metrorail Alternative is the Locally Preferred Alternative, which provides for Metrorail service that would extend the full length of the corridor from a point between the East and West Falls Church Metrorail stations on the Orange Line to Route 772 in Loudoun County.

BE IT FURTHER RESOLVED that:

1. The Town Council requests that the Herndon-Monroe Station construction include necessary facilities for inter-modal transfers and adequate pedestrian facilities on the north-side of the station, and that such facilities be incorporated into the final Environmental Impact Statement for the Dulles Corridor Rapid Transit Project; and

2. The Town of Herndon supports federal, state and local officials working together to achieve full funding for the Metrorail Alternative from federal, state and local sources.

This is certified to be a true and accurate copy of Resolution 02-G-98 adopted at a legally convened meeting of the Town Council of the Town of Herndon on August 13, 2002.

Viki L. Wellershaus, Town Clerk

2

02-G-98
TOWN OF HERNDON, VIRGINIA

RESOLUTION

JUNE 12, 2001

Resolution- Recommending a Preferred Alternative for Northside Pedestrian Access to the Future Herndon-Monroe Transit Station.

WHEREAS, on July 18, 2000, the Town Council awarded a contract to Parsons Transportation Group to prepare a study of alternatives for northside access to the Herndon-Monroe Transit Station; and

WHEREAS, on November 21, 2000, the Planning Commission and Town Council held a joint work session and heard a presentation by the consultant about the preliminary findings of the study and provided comments to the consultant; and

WHEREAS, the Planning Commission has reviewed the Herndon-Monroe Transit Station Northside Access Study, the staff report and attachments; and

WHEREAS, on March 5, 2001, the Planning Commission held a public hearing on the Herndon-Monroe Transit Station Northside Access Study; and

WHEREAS, the Town Council has reviewed the Herndon-Monroe Transit Station Northside Access Study, the staff report and attachments; and

WHEREAS, on June 12, 2001, the Town Council held a public hearing on the Herndon-Monroe Transit Station Northside Access Study; and

WHEREAS, notice of the public hearing was advertised in accord with Section 15.2-2204 of the Code of Virginia (1950) as amended.

NOW, THEREFORE, BE IT RESOLVED by the Town Council of the Town of Herndon that:

1. The Town Council approves the Herndon-Monroe Northside Access Study, dated January 26, 2001, prepared by Parsons Transportation Group, Inc., which recommends Alternative Four as the preferred configuration to be explored in more detail with the Virginia Department of Rail and Public Transportation.


This is certified to be a true and accurate copy of Resolution 01-G-57 adopted at a legally convened meeting of the Town Council of the Town of Herndon on June 12, 2001.

Viki L. Wellershaus, Town Clerk

01-G-57
August 26, 2002

VIA: FAXSIMILE & US MAIL

Mr. Corey W. Hill, Northern Virginia Regional Manager
Virginia Department of Rail and Public Transportation
1550 Wilson Blvd., Suite 300
Arlington, Virginia 22209

RE: PUBLIC HEARING RECORD – Docket R02-1
Draft Environmental Impact Statement and Proposed General Plans for the
Dulles Corridor Rapid Transit Project (DCRTP).

Submission of the Town of Herndon’s Locally Preferred Alternative (LPA)
resolution and associated resolutions in support of Metrorail

Dear Mr. Hill:

On behalf of the citizens of the Town of Herndon, I am pleased to submit the attached
resolutions to be entered into the Public Hearing Record for the Draft Environmental Impact
Statement and Proposed General Plans for the Dulles Corridor Rapid Transit Project (DCRTP).

On August 13, 2002, the Town Council of the Town of Herndon unanimously passed the
attached resolution recommending the “Metrorail Alternative” as the Locally Preferred
Alternative (LPA) to be forwarded to the Virginia Department of Rail and Public Transportation
(VDRPT), the Washington Metropolitan Area Transportation Authority (WMATA), and the
Commonwealth Transportation Board (CTB).

The Town Council views the near-term implementation of rapid transit in the Dulles Corridor as imperative. The Town Council is in full support of the effort to bring Metrorail to the
Dulles Corridor due to the capacity limitations of Bus Rapid Transit and the disruption issues
associated with phased implementation. During the past few years, we have been looking closely
at the important Herndon-Monroe Station proposal and how to best develop pedestrian and
vehicular access to the station from the Town of Herndon. This effort resulted in the Town
completing an engineering concept and feasibility study in cooperation with VDRPT as well as
other project sponsors.
On June 12, 2001, the Town Council unanimously passed a resolution recommending a preferred alternative for direct access from the Town to the future Herndon-Monroe Transit Station. The Town’s selected alternative is referred to as Alternative #4 and, as stated in the attached resolution, it is the preferred configuration to be explored in more detail with Virginia Department of Rail and Public Transportation. This alternative emphasizes a pedestrian walkway extending from the station to the north, directly into Herndon, with a modal transfer point for persons arriving by bus, car-pool, van-pool, automobile and bicycle.

The Town Council believes that enhanced pedestrian and vehicular access on the north side should be a part of the station development scheme from the beginning. Effective north side access to the station will have beneficial impact on Town property values and the quality of life of residents and person working in the Town, over the long term, especially if appropriate redevelopment of the transit station area is implemented during the coming years.

It is my hope that through the auspices of the Virginia Department of Rail and Public Transportation and the Washington Metropolitan Area Transit Authority that the Metrorail Alternative and the Town’s preferred Herndon-Monroe station access alternative will maximize transit ridership while contributing to high-quality transit-oriented development within the Town of Herndon.

The Town wishes the Virginia Department of Rail and Public Transportation, the Washington Metropolitan Area Transit Association and the Commonwealth Transportation Board success in submitting the DCRTP - Environmental Impact Statement and Proposed General Plans to the Federal Transit Administration during the coming months.

I would be happy to respond to any questions you may have concerning the Town’s position on these or other matters related to the development of the Dulles Corridor Rapid Transit Project.

Sincerely,

Rick Thoesen

Richard C. Thoesen
Mayor
Attachments:
Resolution 02-G-98, August 13, 2002
  Recommending the Metrorail Alternative as the Locally Preferred Alternative (LPA)

Resolution 01-G-57, June 12, 2001
  Recommending a preferred station access alternative for the Herndon-Monroe Station

Resolution 01-G-119, November 13, 2001
  Support to Congress to expedite the extension of Metrorail to Dulles Airport

cc: Members of the Herndon Town Council
    The Honorable Christopher J. Riddick & Members of the Herndon Planning Commission
    Whittington W. Clement, Chairman, Commonwealth Transportation Board
    John Dittmeier, P.E. Acting Project Manager, WMATA
    Jim Deuel, Chairman of the Board, Herndon Dulles Chamber of Commerce
    John E. Moore, Town Manager
    Albert R. Colan, Director of Public Works
    Henry G. Bibber, Director of Community Development
    Dana E. Heiberg, Senior Comprehensive Planner
    Mark E. Duceman, Town of Herndon, Transportation Planner
TOWN OF HERNDON, VIRGINIA

RESOLUTION

AUGUST 13, 2002

Resolution- Recommending a Locally Preferred Alternative (LPA) and Other Considerations to be Forwarded to the Washington Metropolitan Area Transportation Authority (WMATA), the Virginia Department of Rail and Public Transportation (VDRPT) and the Commonwealth Transportation Board (CTB) as a Response to the Draft Environmental Impact Statement and Proposed General Plans of the Dulles Corridor Rapid Transit Project.

WHEREAS, the public information and public participation meetings were held concerning the Draft Environmental Impact Statement and Proposed General Plans for the Dulles Corridor Rapid Transit Project on July 29, July 30, and July 31, 2002 at the locations identified in the Notice of Public Hearings for the purpose of identifying issues and concerns of community members and stakeholders likely to be affected by the project, and to describe the purpose of the Study, identify the alternatives, the goals of the Study, and to increase public awareness and to receive citizens comments with regard to the Draft Environmental Impact Statement and Proposed General Plans for the Dulles Corridor Rapid Transit Project which includes Bus Rapid Transit and Metrorail Service in Fairfax and Loudoun Counties, Virginia; and

WHEREAS, the Town of Herndon approved a resolution, dated November 13, 2001, in support of the efforts of Congress and other leaders to expedite the extension of the Metrorail system to Washington Dulles International Airport; and

WHEREAS, the Town of Herndon approved a resolution, dated June 12, 2001, recommending a preferred alternative (Alternative Four) for north-side pedestrian access to the future Herndon-Monroe Transit Station; and

WHEREAS, the Town’s preferred alternative for north-side pedestrian access to the future Herndon-Monroe Transit Station emphasizes a walkway extending from the station to Herndon Parkway, with a modal transfer point for persons arriving by bus, car-pool, van-pool, automobile and bicycle; and

WHEREAS, the Town of Herndon now has the opportunity to recommend a Locally Preferred Alternative (LPA) for the Dulles Corridor Transit Project from among the following alternatives: Baseline (No-Build) Alternative, Bus-Rapid Transit Alternative, Metrorail Alternative, Bus-Rapid Transit / Metrorail Alternative and a Phased Alternative; and

WHEREAS, the Town staff has reviewed and reported on the draft Environmental Impact Statement (EIS) and Proposed General Plans of the Dulles Corridor Rapid Transit Project; and
WHEREAS, by the year 2025, population in the Dulles Corridor is projected to increase by 56 percent, along with a 71 percent increase in jobs, and Dulles Airport, currently serving more than 20 million passengers annually, is projected to serve 32 million passengers by 2010; and

WHEREAS, based on local land use and transportation plans, this population and employment growth will lead to increased congestion on primary and local service roads and a need for additional capacity; and

WHEREAS, evaluation of the Dulles Corridor Study area has found that the corridor cannot accommodate additional highway expansion and therefore rapid rail (Metrorail Alternative) is the only mode of transportation that can provide substantial additional capacity in the corridor to meet future travel demand; and

NOW, THEREFORE, BE IT RESOLVED by the Town Council of the Town of Herndon that the Metrorail Alternative is the Locally Preferred Alternative, which provides for Metrorail service that would extend the full length of the corridor from a point between the East and West Falls Church Metrorail stations on the Orange Line to Route 772 in Loudoun County.

BE IT FURTHER RESOLVED that:

1. The Town Council requests that the Herndon-Monroe Station construction include necessary facilities for inter-modal transfers and adequate pedestrian facilities on the north-side of the station, and that such facilities be incorporated into the final Environmental Impact Statement for the Dulles Corridor Rapid Transit Project; and

2. The Town of Herndon supports federal, state and local officials working together to achieve full funding for the Metrorail Alternative from federal, state and local sources.

This is certified to be a true and accurate copy of Resolution 02-G-98 adopted at a legally convened meeting of the Town Council of the Town of Herndon on August 13, 2002.

Jessica E. Lynch, Deputy Town Clerk

02-G-98
TOWN OF HERNDON, VIRGINIA

RESOLUTION

JUNE 12, 2001

Resolution- Recommending a Preferred Alternative for Northside Pedestrian Access to the Future Herndon-Monroe Transit Station.

WHEREAS, on July 18, 2000, the Town Council awarded a contract to Parsons Transportation Group to prepare a study of alternatives for northside access to the Herndon-Monroe Transit Station; and

WHEREAS, on November 21, 2000, the Planning Commission and Town Council held a joint work session and heard a presentation by the consultant about the preliminary findings of the study and provided comments to the consultant; and

WHEREAS, the Planning Commission has reviewed the Herndon-Monroe Transit Station Northside Access Study, the staff report and attachments; and

WHEREAS, on March 5, 2001, the Planning Commission held a public hearing on the Herndon-Monroe Transit Station Northside Access Study; and

WHEREAS, the Town Council has reviewed the Herndon-Monroe Transit Station Northside Access Study, the staff report and attachments; and

WHEREAS, on June 12, 2001, the Town Council held a public hearing on the Herndon-Monroe Transit Station Northside Access Study; and

WHEREAS, notice of the public hearing was advertised in accord with Section 15.2-2204 of the Code of Virginia (1950) as amended.

NOW, THEREFORE, BE IT RESOLVED by the Town Council of the Town of Herndon that:

1. The Town Council approves the Herndon-Monroe Northside Access Study, dated January 26, 2001, prepared by Parsons Transportation Group, Inc., which recommends Alternative Four as the preferred configuration to be explored in more detail with the Virginia Department of Rail and Public Transportation.


This is certified to be a true and accurate copy of Resolution 01-G-57 adopted at a legally convened meeting of the Town Council of the Town of Herndon on June 12, 2001.

Jessica E. Lynch, Deputy Town Clerk

01-G-57
TOWN OF HERndon, VIRGINIA

RESOLUTION

NOVEMBER 13, 2001

Resolution—Town of Herndon Support of the Efforts of Congress and Other Leaders to Expedite the Extension of the Metrorail System to Washington Dulles International Airport.

WHEREAS, the Town of Herndon is located along the Dulles Corridor, with Washington Dulles International Airport located two miles to the west and the nation’s capital and seat of government located twenty-two miles to the east; and

WHEREAS, Washington Dulles International Airport is an important part of the transportation infrastructure of the National Capital region during times of peace as well as times of crisis; and

WHEREAS, the terrorist attacks of September 11, 2001 threatened the security of the National Capital region and made us aware that we lack adequate mobility to meet emergency circumstances; and

WHEREAS, the national security of the United States requires that the National Capital region function efficiently in times of crisis or emergency; and

WHEREAS, the Metrorail System functioned efficiently in evacuating people from Washington D.C. after the attacks of September 11, 2001; and

WHEREAS, citizens of United States and others from throughout the world need to be able to visit the National Capital region in a safe and efficient manner during times of peace as well as times of crisis; and

WHEREAS, members of Congress and other leaders have determined that it is strongly in the interest of the United States to expedite extension of Metrorail to Dulles Airport and Loudoun County to enhance mobility in the National Capital region.

NOW, THEREFORE, BE IT RESOLVED by the Town Council of the Town of Herndon, Virginia that it:

1. Supports the efforts of members of Congress and other leaders to expedite the extension of the rail system to Washington Dulles International Airport.

2. Encourages the Federal Transit Administration to work with the Commonwealth of Virginia and local governing bodies to develop a plan to expedite extension of the rail system to Washington Dulles International Airport.

BE IT FURTHER RESOLVED that the Town of Herndon supports federal, state, and local officials working together to achieve full funding for the Dulles Rail Project from federal, state, and local sources, including proposed federal funding contained in legislation currently under consideration as part of the federal response to the terrorist attacks.

This is certified to be a true and accurate copy of Resolution 01-G-119 adopted at a legally convened meeting of the Town Council of the Town of Herndon on November 13, 2001.

Viki L. Wellershaus, Town Clerk

01-G-119
Mr. John Dittmeier, P.E.
Acting Project Manager
Washington Metropolitan Area Transit Authority (WMATA)
Dulles Corridor Rapid Transit Project
1550 Wilson Blvd., Suite 300
Arlington, VA 22209

RE: Town of Herndon Review of the Dulles Corridor Rapid Transit Project (DCRTP),
95% Draft - Environmental Impact Study

Dear Mr. Dittmeier:

Thank you for the opportunity to review the 95% Draft - Environmental Impact Study for the Dulles Corridor Rapid Transit Project (DCRTP). The Town staff and I are impressed with the comprehensiveness of the EIS evaluation and the many environmental and socioeconomic aspects associated with implementing this project.

I would like to take this opportunity to thank Mr. Neil Nott and Dr. Ramen De for meeting with our Community Development staff on February 26, 2002 to address specific concerns with the Draft EIS and to discuss a few of the transit and pedestrian access design elements of the future Herndon-Monroe Station. Town staff has completed its review of the eleven technical EIS reports and determined that there are two issues that should be clarified; both of which were discussed during the meeting and are further described below:

1. The ‘Traffic Analysis and Station Access EIS Technical Report’ states: On the north side of the Dulles Toll Road, it is assumed that the Town of Herndon is providing a small Kiss & Ride and bus transfer facility in what is currently a private parking lot. However, the Town’s position is to convey that there are no current plans to fulfill this assumption.

2. The ‘Land Use EIS Technical Report’ delineates a Station-Access Study Area whereby it does not accurately represent the Town’s recently approved land-use changes. Specifically, Town Council approved a major development project (Quadrangle - Fairbrook Business Park) which, when completed, will have three buildings totaling 525,000 sq. ft. of floor area. This development will be located within 1,500 feet of the Herndon-Monroe station platform (Tax Map: 16-4-010-5B) Consequently, the additional density and it effects on ridership modeling and traffic impact should be considered during final EIS preparation. As discussed during the meeting, redevelopment in the Station-Access Study Area is expected to change dramatically within the next twenty-five to fifty years. Indeed, office development within the Town has outpaced recent rounds of the MWCOG cooperative land use forecasts.
With regard to our discussions concerning Alternative #4 for Herndon's north side access, we have been advocating that enhanced transit, pedestrian and vehicular access on the north side should be a part of the station development from the beginning. Such access would emphasize a modal-transfer point for persons arriving by bus, car-pool, van-pool, automobile and bicycle.

Although, it was disappointing to learn that a transfer facility would not be included in the initial plans, it was nevertheless refreshing to hear positive feedback regarding the potential for a bus-drop off facility, similar to the plans developed for the north access at the Reston Parkway Station. Such an arrangement for a bus-drop off facility along Herndon Parkway will provide a safe, efficient and convenient transit drop-off point for pedestrians wishing to access the station.

The Town Council fully supports the effort to bring bus and rail transit to the Dulles Corridor. Consequently, the Town of Herndon looks forward to the opportunity of constructing a transfer facility in the context of a future public-private redevelopment venture adjacent to the station. Effective north side access to the station will have beneficial impacts on Town property values and the quality of life of residents and person working in the Town, over the long term, especially if appropriate transit oriented redevelopment of the transit station area is implemented during the coming years. With WMATA's expertise the Town will be developing plans to encourage such a TOD redevelopment scenario.

The Town wishes the Washington Metropolitan Area Transit Association success in its endeavors in submitting the DCRTP - Draft EIS Technical Reports to the Federal Transit Authority during April 2002. I would be happy to respond to any questions you may have concerning the Town's position on these or other matters related to the development of the Dulles Corridor Rapid Transit Project.

Sincerely,

[Signature]
John E. Moore
Town Manager

Attachment: Herndon-Monroe Station Northside Access Study, Final Report

cc: Neil Nott, Washington Metropolitan Area Transit Authority (WMATA)
Karl Rohrer, Virginia Department of Rail and Public Transportation (VDRPT)
Carol A. Bruce, Town of Herndon, Mayor
Albert R. Colan, Town of Herndon, Public Works Director
Harry G. Bibber, Town of Herndon, Community Development Director
Mark Duceman, Town of Herndon, Transportation Planner
Micki O'Hare, Town of Herndon, Comprehensive Planner
August 8, 2000

Leonard Alfredson, Project Manager-WMATA
Dulles Corridor Rapid Transit Project
1550 Wilson Boulevard, Suite 300
Arlington, VA 22209

Subject: Town of Herndon comments for the scoping deadline August 10, 2000

Dear Mr. Alfredson:

We appreciate the opportunity to participate in the Preliminary Engineering—National Environmental Policy Act process for the Dulles Corridor Rapid Transit Project. I offer the following comments on behalf of the Town of Herndon.

The Town of Herndon participated in the Dulles Corridor Transportation Study and continues to participate in the Dulles Corridor Task Force. We support the findings of the original Major Investment Study, namely the extension of a Metro-like rail system in the Dulles Corridor. We also support the MIS Supplement addressing Bus Rapid Transit as part of a phased transition to rail transit. The Town supports the Herndon-Monroe and CIT-Herndon (Route 28) station locations as well as the other stations confirmed in the MIS Supplement. We assert that the Route 28 station would be essential if, for any reason, the system were to develop without the Loudoun County stations. The Town does not support options where Dulles Airport is the system terminus and Herndon-Monroe is the de facto system terminus in terms of Park and Ride and vehicular access facilities.

The Town advocates the provision of enhanced northside access to the Herndon-Monroe Station (BRT and Rail), except under scenarios where the transit system terminates at Dulles Airport and there is no CIT-Herndon (Route 28) station. Good access to all four of the Reston-Herndon stations from both sides of the Toll Road will enhance pedestrian/bicycle use and help distribute and mitigate local traffic impacts in the corridor.

We advocate that a pedestrian entrance be provided at the Herndon-Monroe Station into the Town of Herndon, along with enhanced pedestrian and vehicular access facilities connecting Herndon Parkway and/or Van Buren Street to the station. Given that all of the northside properties bordering the Dulles Toll Road at the station location are fully developed, we request that the Rapid Transit Project undertake the capital improvements to retrofit access facilities into these properties. This may include the
construction of access ramps and structured parking to accommodate the relocation of a modest quantity of existing surface parking. The Town does not support the development of parking facilities to accommodate automobiles on the north side of the Herndon-Monroe Station.

As noted in the Scoping Information Packet, The Town has initiated the Herndon-Monroe Station Northside Access Study. This is a collaborative concept design and feasibility effort that we intend to conclude early in 2001. This effort will devise and evaluate various means of providing enhanced pedestrian, bicycle, automobile and bus access to the station from areas to the north of the Toll Road. This study is expected to result in a decision by the Herndon Town Council on a preferred access alternative and concept design. A formal request for construction of these facilities will be submitted during the "Selection of Viable Alternatives" stage of the PE/NEPA process.

Office development within the Town has outpaced recent rounds of the MWCOG cooperative land use forecast as well as exceeding the projections included in the Major Investment Study. If current data on existing and pipeline development within the Town are needed for this study, please contact Mr. Dana Heiberg, our Transportation Program Manager.

Thank you for considering these comments.

Sincerely,

Henry G. Bibber
Director of Community Development

Cc:  John E. Moore, Town Manager
     Young Ho Chang, Director, Fairfax County Department of Transportation
     Albert R. Colan, Director of Public Works
     Dana E. Heiberg, Transportation Program Manager
K.5.3 Town of Leesburg

- February 25, 2004
February 25, 2004

Mr. Karl Rohrer
Deputy Project Director
Virginia Department of Rail and Public Transportation
1550 Wilson Boulevard, Suite 300
Arlington, Virginia 22209

Dear Mr. Rohrer:

On February 24, 2004, the Leesburg Town Council approved a resolution supporting express bus service among Leesburg, Loudoun County, Washington, DC, and Rosslyn, Virginia. A copy of the resolution is attached.

Transportation is a high priority for the Town of Leesburg. Many residents commute to other areas of Northern Virginia via express buses. The Town Council supports the current express bus service, as well as other alternative forms of transportation to help address Northern Virginia’s regional traffic problems.

The Town Council appreciates the public outreach effort of the Virginia Department of Rail and Transportation on the Dulles Corridor Transportation Project. The town respectfully requests correction of error published in the draft EIS stating that premium bus service will replace current express bus service in Loudoun County. We understand from Loudoun County that the error will be corrected in the final publication and will reflect continued express bus service. On behalf of the residents of our town, thank you in advance for your willingness to correct that error and support the long-term planning required to address our region’s transportation needs.

Very truly yours,

Robert S. Noe, Jr.

Enclosures

cc: County Administrator
    Director of Engineering and Public Works
    Director of Planning and Zoning

executive/public information/letters
RESOLUTION NO. 2004-27

A RESOLUTION: SUPPORTING EXPRESS BUS SERVICE AMONG LEESBURG, LOUDOUN COUNTY, WASHINGTON, DC, AND OTHER PORTIONS OF NORTHERN VIRGINIA

WHEREAS, the Town Council of the Town of Leesburg supports express bus service from Leesburg and Loudoun County to Washington, DC and areas in Northern Virginia; and

WHEREAS, many Leesburg and Loudoun County residents rely on commuter bus service to help reach employment centers throughout the Washington Metropolitan area; and

WHEREAS, alternative modes of transportation like commuter bus service help address the region's transportation needs; and

WHEREAS, the Town Council has supported Bus Rapid Transit west of Leesburg with a station in the Route 7/Route 9 corridor and a station in Leesburg adjacent to the Dulles Greenway; and

WHEREAS, the Town recognizes that an administrative error was made during the publication of the draft Environmental Impact Statement for the Dulles Corridor Transit Project, incorrectly stating that premium bus service would replace the current express bus services in Loudoun County.

WHEREAS, the Town recognizes that Loudoun County has confirmed that the Department of Rail and Public Transportation is aware of the error and committed to make a correction in the final publication, with subsequent County letter confirming that correction.
A RESOLUTION: SUPPORTING EXPRESS BUS SERVICE AMONG LEESBURG, LOUDOUN COUNTY, WASHINGTON, DC, AND OTHER PORTIONS OF NORTHERN VIRGINIA

THEREFORE RESOLVED by the Council of the Town of Leesburg in Virginia as follows:

The Mayor and Town Council of the Town of Leesburg support express bus service among Leesburg, Loudoun County, Washington, DC, and Rosslyn, as a viable alternative to address the region's transportation needs;

THEREFORE FURTHER RESOLVED, that the Mayor and Town Council support the continuation of current express bus service until completion of implementation of future modes of transportation like bus rapid transit and extended Metrorail services outlined in the Dulles Corridor Rapid Transit Project.

PASSED this 24th day of February 2004.

Kristen C. Unistadt, Mayor
Town of Leesburg

ATTEST:

Judith W. Aleck
Clerk of Council

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