THE FEDERATION

August 26, 2002

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:

This letter transmits the written comments of the Fairfax County Federation of Citizens Associations concerning VDRPT's Draft Environmental Impact Statement on the Dulles Corridor Rapid Transit Project. These comments are consistent with and enhance those presented by the Federation to the Fairfax County Board of Supervisors during its public hearing on August 5 - and thus are part of the record of that hearing. The Federation appreciates the opportunity to submit the enclosed comments for consideration in what will be a major (huge may be more descriptive) decision with wide-spread implications. Hopefully, the end result will be the eventual easing of Northern Virginia's ever-worsening traffic congestion.

Briefly summarizing the thrust of these comments, the Federation:

- a. Supports rail transit in the Dulles Corridor, while
- b. <u>Not endorsing</u> at this time any of the four proposed alternatives, pending further assessment of the adequacy of service to and within Tysons Corner (paragraph 3 of the enclosed comments) and linkage with a future Beltway rail system.

These comments reflect the Federation's continuous and extensive participation over the years in Northern Virginia transportation issues, studies and proposed improvement programs. The comments being forwarded are the end product of an intensive, serious review of the complex Draft EIS. We hope these will receive an equally serious consideration within VDRPT.

In closing, please accept the Federation's compliments on the large-scale effort by VDRPT in developing the Draft EIS and conducting the three public hearings, and best wishes for successful future actions on the Dulles Corridor Project.

Sincerely,

Art Wells President

Enclosure: Federation comments

FAIRFAX COUNTY FEDERATION OF CITIZENS ASSOCIATIONS The Fred M. Packard Center 4022 Hummer Road, Annandale VA 22003

Fairfax County Federation of Citizens Associations Comments (Approved 8/26/02)

Dulles Corridor Rapid Transit Project – Draft EIS

1. General - The Federation supports the concept of rapid transit service in the Dulles Corridor.

Rationale: Rapid transit service has long been needed in this corridor because of the existing and projected communities, non-residential development, and employment centers along and beyond the corridor that would most efficiently be served by transit. This would reduce the disparity between development and supporting transportation infrastructure.

2. Funding

a. This EIS process is an exercise in futility if funding for the federal, state and local shares of providing some type of rapid transit system through the corridor cannot be expected. Funding should be reasonably assured before a Locally Preferred Alternative is selected.

Rationale: There is currently no assurance of funding to fulfill the federal, state or local financial shares of providing rail in the corridor.

b. Support the establishment of a Transportation Tax District along the corridor to be served to provide the local share of funding for the rapid transit project. The beneficiaries of the new system must provide adequate funding support. The existence of one or more Tax Districts and the expected contributions must be established so that any additional Fairfax County contribution can be determined.

Rationale: The November 2002 referendum includes \$350 million for Dulles Corridor rail. Should the referendum not be successful, then an alternative local revenue source will be needed. The Tax District(s) must ensure no shortfall in funding, as in the case of the Route 28 Tax District, where other Northern Virginia VDOT projects have been delayed to offset the District funding shortfalls in paying the debt service.

c. The proposal to double the cost of the tolls on the Dulles Toll Road to provide funding for the state share of the cost of rail through the corridor seems exorbitant since current tolls are already providing a surplus.

Rationale: There are currently excess funds from Dulles Corridor tolls that could be applied to the rail project. Also, increasing/doubling the tolls may cause users to find travel alternatives on other congested roads.

d. The Draft EIS suggests that the Fairfax County share of the project cost might be provided by one or more Tax Districts. Should there be District funding shortfalls, there is no indication of how this would be remedied.

Rationale: The Tax District that was to have funded Route 28 improvements could not meet its obligations, necessitating other Northern Virginia projects to be delayed so their funding could make up the District funding shortfalls.

3. Modes of Transit

a. Service to Tysons Corner – The proposed rail alternatives do not seem to provide adequate service to Tysons Corner. Three of these alternatives (T1, T6, T9) have only a single line through the middle of Tysons Corner. It is not clear that the proposed alternatives are any better than the alternative to serve Tysons Corner with a circulator system (alternative T8) that was eliminated in the Initial Screening Phase. The Draft EIS should be revised to include the T8 alternative and provide more details about the adequacy of service to Tysons Corner that could be provided by each of these alternatives.

Rationale: The T1, T6, and T9 alternatives appear to leave much of Tysons Corner beyond walking distance from the stations. Alternative T4 does not appear to be a very practical solution because of the divided directional lines and the inconvenience this would cause riders. The EIS does not provide any information about that portion of the Tysons Corner workers and residents would be served by these alternatives. The rejected T8 alternative could be as good or better than the proposed rail alternatives but this cannot be determined because of inadequate information in the EIS.

b. <u>Bus Rapid Transit</u> – Since the proposed Bus Rapid Transit (BRT) will provide little improvement over the current express bus system if busses must share "the regular traffic lanes" in most cases with other vehicles and do not have a dedicated roadway, we see little or no improvement over the current express bus service.

Rationale: According to the description provided for the BRT alternatives, these buses would operate in the regular traffic lanes "except in the eastbound direction on the Dulles Connector Road, when buses are permitted to use the shoulder during the a.m. peak periods and during periods of severe congestion, when such use does not present a safety hazard to general-purpose traffic."

c. <u>Monorail or similar system</u> – Before proceeding further with the EIS process, DRPT should re-evaluate the outdated 1997 Major Investment Study (MIS) regarding the feasibility of using monorail for the Dulles Corridor project, taking into consideration the lower costs of construction and operation, the ability to better serve the "downtown" areas of Tysons Corner, Reston, Herndon and Dulles Corner, and the requirement for less right-of-way.

Rationale: While monorail was rejected in the 1997 MIS because it was considered an "emerging technology," today, five years later, there are 41 such systems in operation

around the world. Seattle, Washington is proposing to add three additional monorail lines. The costs of construction and operation of monorail is much less than heavy rail, as shown in comparing costs between the Draft EIS and cost data available from monorail companies. An aerial monorail/monobeam system is more flexible and can be routed through "activity centers" to serve the entire areas instead of only the core or only the periphery. Finally, a monorail-type system is less invasive aesthetically and more environmentally friendly.

d. <u>Linkages</u> – The Draft EIS does not indicate that consideration was given to the rapid transit mode that might be used on the Beltway in both Virginia and Maryland and how the current project would link with it. New transit systems on the major corridors should be compatible. DRPT should review the results of the March 2001 report on the alternatives for transit on the beltway and reflect how and why these systems should be compatible.

Rationale: Delegate David Albo legislated a study of possible rail on the Beltway. As of the time of the scoping meetings, several modes were still under consideration: heavy rail, light rail, and monorail. It would seem wise to have compatible modes of transit on the Beltway and out the Dulles Corridor so the systems could be easily linked.

4. <u>Cost</u> - We are concerned that the estimated \$3.3 billion cost for the proposed Dulles Corridor rail transit system will undoubtedly increase, perhaps appreciably, by the time a Locally Preferred Alternative is approved, funding is expected, and construction proceeds.

Rationale: Recent examples of greatly underestimated project costs are the Mixing Bowl (95/495) and the Wilson Bridge. This necessitates borrowing from other projects to fulfill financial obligations.

5. Access to stations - There must be auto and/or bus access to stations, depending on the station location. There was little discussion of this in the Draft EIS other than the proposal to construct a multi-level parking garage at the western end of Tysons Corner on Route 7. There must also be pedestrian and bicycle access to the stations to encourage people to walk or bike to the stations if possible.

Rationale: It is a disincentive to ride transit if there is no feeder bus service to the stations, no parking at the stations or at park-and-ride lots, or no pedestrian/bike access. While these "amenities" are not the direct responsibility of VDRPT or WMATA to design and construct, they are essential elements of an efficient transit system.

6. Environmental Impacts

- a. <u>Noise</u> Residential neighborhoods must be adequately protected from heavy rail noise, such as from passing trains, wheel squeal from trains rounding curves, etc.
- b. <u>Aesthetics</u> The heavy substructure of the proposed aerial heavy rail in Tysons Corner is visually intrusive. It resembles elevated trains from the past rather than 21st century technology.

c.	<u>Light flashes</u> – The light flashes created when trains pass over tie breakers is a potential nighttime nuisance for nearby residents and others.