December 4, 2015

The Honorable Aubrey Layne
Secretary of Transportation
Office of the Secretary of Transportation
PO Box 1475
Richmond, VA 23218

Re: I-395 Express lanes.

Dear Secretary Layne,

On behalf of the Arlington County Board, thank you for your November 20, 2015 letter to Fairfax County Chairman Bulova, Alexandria Mayor Euille, and me regarding the Commonwealth’s intention to initiate an environmental assessment to study the extension of the I-395 Express lanes north through Arlington to the District of Columbia, and a transportation demand management study to identify multimodal strategies to improve travel in the corridor. Your hard work and willingness to partner with us are very much appreciated.

Having worked with you and your staff to plan what we hope will be a successful I-66 inside the Beltway multimodal project, we’re optimistic that a mutually beneficial outcome is possible on I-395.

Although past efforts to bring dynamic tolling to I-395 in Arlington were divisive, our concerns in the past were due to the lack of a detailed impact analysis and to specific implementation details, as opposed to the general concept. Arlington has in the past been receptive to the potential benefits of dynamic tolling as a way to manage highway facilities and improve transit, but only as part of a broad package that legitimately and significantly enhances multimodal services and facilities, over the entire lifetime of the facility.

In many ways, I-395 is a successful corridor now. The corridor carries a tremendous number of people on a variety of modes, both within the I-395 right-of-way and on parallel facilities. Unfortunately, I-395’s multimodal nature has degraded over the years, first as the center reversible lanes were converted from bus-only to HOV, and now, potentially, as HOV is converted to allow single-occupant cars. Any successful HOT project on I-395 must ensure that transit service is capable of operating effectively, and is enhanced rather than degraded further.
This is a serious concern. During the planning for now-existing express lane facilities elsewhere in Northern Virginia, previous administrations promised multimodal improvements that never materialized. That cannot be allowed to happen again.

Given the tumultuous history of I-395 planning, and the unique demands of multimodal travel inside the Beltway, the following issues are of particular concern to Arlington as this conversation moves forward:

1. **Transit and Transportation Demand Management (TDM)**
   Transit and TDM must be an integral part of the project, well-planned and funded with ongoing, stable, and sufficient revenues. The Commonwealth should undertake a comprehensive transit/TDM study, including a detailed transit operations analysis, and commit to using the majority of toll revenue, beyond what is necessary to maintain and operate the facility, to finance multimodal projects. Significant up-front funding should be provided so that transit and other multimodal projects are implemented contemporaneously with the start of tolling.

2. **Third party concessionaire**
   The involvement of the third party concessionaire raises concerns. The concessionaire’s involvement must be strictly defined, and include enforceable protections that ensure the project retains its multimodal focus, its obligation to mitigate unintended consequences on local streets, and funding both during the implementation of tolling and over the long-term.

3. **Do not harm transit oriented communities**
   This project must not undermine Arlington’s successful investment in congestion-reducing transit-oriented development in Pentagon City, Crystal City, or Shirlington. These important mixed-use neighborhoods reduce congestion by focusing on walkable, transit-oriented land uses. The addition of highway-oriented infrastructure and increased traffic into these communities would have the unintended consequence of making it more difficult to walk, bike, and access transit, resulting in more traffic congestion, not less. Providing and maintaining balanced multimodal access to these neighborhoods is essential.

   Specifically, we appreciate the call-out of no changes to the off-ramp at Shirlington Circle. Special attention will need to be paid to traffic management and context-sensitive road design at the Eads Street exit, with a particular focus on preserving and enhancing bus access to the Pentagon, where over 1,000 buses connect every weekday, with still other transit connecting at Pentagon City.

4. **Impact studies**
   Comprehensive traffic and environmental studies are necessary to fully understand the proposed project, including a robust NEPA process that includes a study area extending at least one mile out from the I-395 right-of-way, to include parallel and connecting facilities such as Metro, VRE, Route 1, and Columbia Pike.
5. **Remain within existing right-of-way**
   Any changes to the I-395 facility should take place fully within the existing I-395 right-of-way only, and must not negatively impact multimodal infrastructure or service.

6. **Coordinate with DC**
   Given the profile of traffic using I-395, we strongly recommend coordination and, if possible, partnership with the District of Columbia, to extend the HOT facility across the Potomac River and to make needed improvements to transit, pedestrian, and bicycle accessibility in the 14th Bridge / Long Bridge corridor.

Gaining Arlington’s ultimate support for this project will depend, as always, on implementation details such as these. We are heartened to see many of the same issues raised in your November 20th letter, and look forward to coordinating with you on them over the coming months.

Once again, thank you for your diligent work on behalf of the Commonwealth, and your commitment to producing the best possible transportation network for Northern Virginia.

Sincerely,

Mary Hynes
Chair, Arlington County Board

cc Members, Arlington County Board
    William Euille, Mayor of Alexandria
    Sharon Bulova, Chair, Fairfax County Board of Supervisors