BRAC-133 ADVISORY GROUP

March 21, 2011

Mayor William D. Euille and Members of City Council
301 King Street – City Hall
Alexandria, VA 22314

Re: Opportunity for Public Input During VDOT's Environmental Review of Alternative F

Dear Mayor Euille and Members of City Council:

The BRAC-133 Advisory Group (Advisory Group) respectfully submits these comments to the City Council (Council) regarding the level of environmental documentation that would be useful for the Virginia Department of Transportation (VDOT) to have when evaluating the proposed HOV/Transit ramp at Seminary Road and I-395 known as Alternative F. As discussed below, the Advisory Group believes that it would be beneficial for VDOT to conduct an Environmental Assessment (EA) unless doing so would result in a loss of funding for Alternative F.

At the Advisory Group meeting on March 16, 2011, numerous Advisory Group members and public speakers discussed the benefits of conducting an EA. Such benefits would include, among other things: (1) the opportunity for the public to provide valuable input to VDOT at the outset of the review process through the scoping mechanism; (2) the analysis of several alternatives in order to compare the effects and benefits of Alternative F with other options; and (3) a formal mechanism to permit the public to provide comments on VDOT's findings. Notwithstanding these potential benefits, however, it was also noted by several speakers that having to prepare EA-related environmental documentation, as compared to that required by a Categorical Exclusion (CE), could possibly jeopardize funding for Alternative F.

With the above considerations in mind, the Advisory Group adopted a motion to express its position that it would be beneficial for VDOT to conduct an EA unless doing so would result in a loss of funding for Alternative F. This motion reflected the Advisory Group's belief that it will be highly useful for VDOT to solicit public input to the greatest extent possible, which VDOT has appeared reluctant to do at times. For example, instead of waiting just two days to get input from the Advisory Group at its March 16, 2011, meeting regarding the use of a CE, VDOT proceeded to submit its request for a CE to the Federal Highway Administration (FHWA) on March 14, 2011.

At the end of the day, the FHWA will determine whether to grant a CE to VDOT. In making its decision, the FHWA will carefully review the criteria for granting a CE set forth under statute and regulations, including whether the planned action may: (1) induce significant impacts to planned growth or land use for the area; (2) involve significant air or noise quality impacts; and (3) have significant impacts on travel patterns. Since each of these criteria could be triggered with respect to Alternative F, it is not clear whether the FHWA will choose to grant a CE in this instance.

In the event that the FHWA grants a CE to VDOT, we request that Council urge VDOT to provide as much opportunity for public input throughout the environmental review process as possible.

Respectfully submitted,

David Dexter

David Dexter, Chair
BRAC-133 Advisory Group

Geoffrey M. Goodale

Geoffrey Goodale, Vice-Chair
BRAC-133 Advisory Group

cc: The Honorable Charniele Herring
Mr. Gerald L. Solomon, FHWA
Mr. Thomas Fahrney, VDOT
BRAC-133 Advksory Group