



OFFICE OF THE CITY MANAGER  
301 King Street, Suite 3500  
Alexandria, Virginia 22314-3211

BRUCE JOHNSON  
Acting City Manager

703.746.4300  
Fax: 703.838.6343

September 15, 2011

Mr. Robert Iosco, Environmental Program Manager  
VDOT Northern Virginia District  
4975 Alliance Drive  
Fairfax, Virginia 22030

RE: Route Number: 395  
Project Number 0095-100-722, P101  
UPC: 96261  
Town/City/County: City of Alexandria  
iPM Project Description: I-395 HOV Ramp @ Seminary Road

Dear Mr. Iosco:

I am writing on behalf of the various agencies of the City of Alexandria in my capacity as Acting City Manager. Your letter, dated August 9, 2011, requested comments on the potential impacts of the above referenced road improvement project within the boundaries of the City of Alexandria. In lieu of transmitting several responses, we are opting to provide a unified response on behalf of the following City departments and agencies: Transportation and Environmental Services (T&ES), Planning and Zoning, Office of Historic Alexandria, Office of Emergency Management, Fire and Emergency Services, Police Department, Alexandria Economic Development Partnership (AEDP), and DASH. Alexandria City Public Schools will provide a separate response.

**1. Do you anticipate or are you aware of any organized opposition to the proposed project?**

Despite requests for further analysis of the HOV/Transit Ramp concept (known locally as Alternative F) there have been objections to the project from within the community at large and expressed at the meetings of the BRAC-133 Advisory Group and via email. Enclosed herewith are individual and group concerns relating to issues which will be reviewed during the EA process. These comments were discussed at the September 7, 2011, special meeting of the BRAC-133 Advisory Group. Also enclosed herewith are letters which requested further analysis and consideration of the project from David

Mr. Robert Iosco, Environmental Program Manager  
VDOT Northern Virginia District  
September 15, 2011  
Page 2

Dexter, Chairman of the BRAC-133 Advisory Group, dated March 8, 2011, and from Mayor William Euille dated March 21, 2011. In addition, an internal memorandum dated July 27, 2011, from Richard Baier, Director of Transportation and Environmental Services, is enclosed which provides a synopsis of the project history.

Much of the opposition to date has been related to:

- the perception of adverse impacts of additional traffic moving through residential areas east and west of the project site via Seminary Road;
- potential environmental and visual impacts for residents who live along the eastern side of I-395;
- potential noise impacts for these same residents;
- the process not giving due consideration to residents' interest in having more transit-oriented solutions considered; and
- the process not providing opportunities for resident involvement in the preparation of the draft purpose and needs statement.

**2. Are you aware of any disproportionately high and adverse effects to minorities or low income populations that could result from this project?**

Several of the residential areas surrounding the proposed ramp have lower median incomes than the City-wide median income. In addition, several of the residential areas surrounding the proposed ramp provide a significant amount of affordable housing within the City.

Because a significant number of the buildings such as the Southern Towers and Seminary Towers apartment buildings are within close proximity to the proposed ramp, there is a need to carefully consider noise and visual impacts that could adversely impact minority and/or lower income populations.

**3. Will the project disrupt a community or its planned development?**

This project will have positive and negative impacts on the community. It will help relieve traffic congestion west of I-395. However, if the right turn movement from the Transit/HOV ramp is permitted allowing the transit and HOV vehicles to travel eastbound on Seminary Road, the traffic volumes on eastbound Seminary Road and other

City of Alexandria roadway facilities could potentially increase. The increase in traffic volumes will need to be forecasted by VDOT and the impacts on adjacent intersections will need to be measured to ensure that adequate traffic operations are maintained with the implementation of the Transit/HOV ramp.

Also, as discussed within other responses, elements such as noise, visual impacts and impacts to existing I-395 slope and vegetation – screening could be a disruption to the adjoining residential uses and/or open spaces. If the proposed ramp proceeds, these issues and potential mitigation measures will need to be analyzed as part of the environmental review process. In addition, the construction could be disruptive to the adjoining communities.

**4. What is the existing and proposed zoning for this area?**

Although developed with a variety of land uses, the parcels surrounding the proposed ramp generally consist of the following zoning categories:

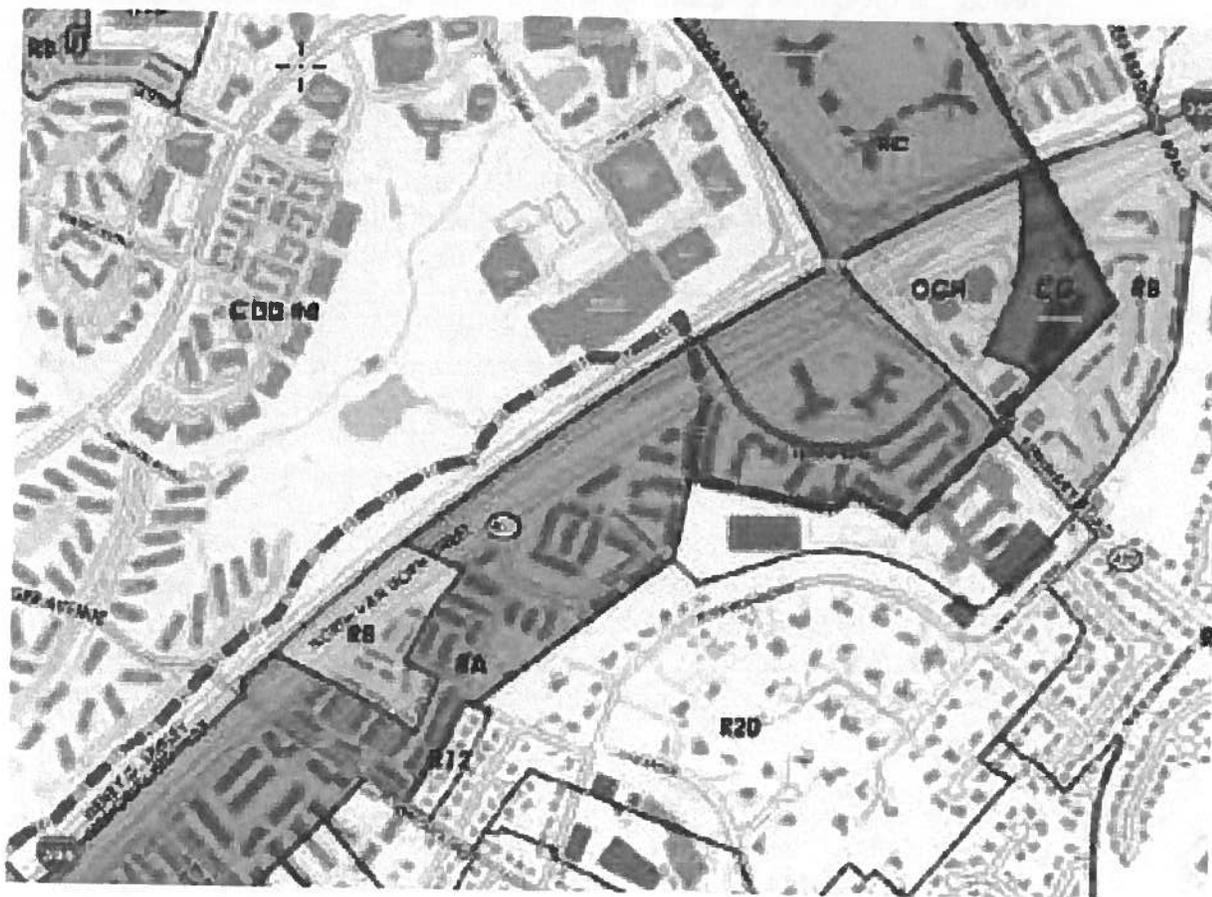
- **CDD: Coordinated Development District**  
A majority of the land adjacent to the project area is zoned CDD#4. These areas include the Mark Center, Winkler Botanical Preserve and the apartment communities located along Beauregard Street and Sanger Avenue.  
*"A site zoned CDD is intended for a mixture of uses to include office, residential, retail, hotel and other uses with appropriate open space and recreational amenities to serve the project users and residents of the city. A CDD zone is intended to encourage land assemblage and/or cooperation and joint planning where there are multiple owners in the CDD zoned area. A review process is established to ensure that such developments exhibit a proper integration of uses, the highest quality of urban and architectural design and harmony with the surrounding areas of the city."*<sup>1</sup>
- **R-20: Single – Family Residential Zone**  
*"The R-20 zone is established to provide and maintain land areas for low density residential neighborhoods of single-family homes on 20,000 square foot lots. Non-residential uses of a noncommercial nature which are related to, supportive of and customarily found in a residential neighborhood are also permitted."*<sup>1</sup>
- **R-12: Single-Family Residential Zone**  
*"The R-12 zone is established to provide and maintain land areas for low density residential neighborhoods of single-family homes on 12,000 square foot lots."*

*Nonresidential uses of a noncommercial nature which are related to, supportive of, and customarily found in a residential neighborhood are also permitted.”<sup>1</sup>*

- **R8: Single-Family Residential Zone**  
*“The R-8 zone is established to provide and maintain land areas for low density residential neighborhoods of single-family homes on 8,000 square foot lots. Nonresidential uses of a noncommercial nature which are related to, supportive of and customarily found in such residential neighborhoods are also permitted.”<sup>1</sup>*
- **RB: Townhouse Zone**  
*“The RB zone is established to provide and maintain land areas for medium density residential neighborhoods in which single-family, two-family and townhouse dwellings are permitted. Nonresidential uses of a noncommercial nature which are related to, supportive of and customarily found in such residential neighborhoods are also permitted.”<sup>1</sup>*
- **RA: Multifamily Zone**  
*“The RA Zone is established to provide and maintain land areas for medium density residential neighborhoods in which apartments predominate and in which single-family, two-family and townhouse development is permitted. Nonresidential uses of a noncommercial nature which are related to and supportive of and customarily found in such residential neighborhoods area also permitted.”<sup>1</sup>*
- **RC: High Density Apartment Zone**  
*“The RC zone is established to provide and maintain land areas for high density apartment buildings and to permit limited commercial uses in such structures. Nonresidential uses of a noncommercial nature which are related to, supportive of and customarily found in such residential neighborhoods are also permitted.”<sup>1</sup>*
- **OCH: Office Commercial High Zone**  
*“The OCH zone is designed to allow office centers in those areas suitable for high density and heights.”<sup>1</sup>*
- **CG: Commercial General Zone**  
*“The CG zone is intended to provide for retail and service uses, including automobile oriented businesses, in community serving shopping centers along*

*major roads. Although office uses are permitted, the zone is not intended as an area for office centers.”<sup>1</sup>*

There is an ongoing community planning process evaluating the zoning and other land use issues adjacent to the proposed ramp.



**City of Alexandria Zoning Map**

**6. Has the project area been included in any city historical research?**

Although there are no known cultural studies of properties within the immediate disturbance areas for this project, there are a number of historical and archaeological studies of sites in the vicinity. These include:

---

<sup>1</sup> City of Alexandria Zoning Ordinance

Mr. Robert Iosco, Environmental Program Manager  
VDOT Northern Virginia District  
September 15, 2011  
Page 6

- Adams, Robert M., *Archaeological Survey of the Proposed Upper and Lower Ponds at the Winkler Botanical Preserve, Alexandria, Virginia*. International Archaeological Consultants, Rawlins, Wyoming, 1991.
- Adams, Robert M., *The Archaeological Investigations of Two Storm Drain Corridors at the Stonegate Development, Alexandria, Virginia*. International Archaeological Consultants, Rawlins, Wyoming, 1993.
- Adams, Robert M., *Archaeological Investigations of the Stonegate Development (Including Sites 44AX31, AX166 and 167), City of Alexandria, Virginia*. International Archaeological Consultants, Rawlins, Wyoming, 1993. (Report on investigations of an upland Native American tool-manufacturing site—44AX166, a Native American camp site—44AX31 on a low stream terrace, and historical residences and pig farming area—44AX167)
- Adams, Robert M., *The Archaeological Investigation of the Undeveloped Upland Terraces in Mark Center, City of Alexandria, Virginia*. International Archaeological Consultants, Rawlins, Wyoming, 1994. Report on the discovery of a Native American tool-making site—44AX163 and a slave/tenant residence—44AX162)
- Adams, Robert M., *Preliminary Archaeological Investigation of the Stonegate Development (Parcel C) West Braddock Road, City of Alexandria, Virginia*. International Archaeological Consultants, Rawlins, Wyoming, 1996. (Report on the discovery of a Native American tool-making site and a slave/tenant residence; Civil War encampment)
- Franz, Karl, *Phase I Archeological Survey for the Stream Restoration Project, Winkler Botanical Preserve, Alexandria, Virginia*. The Ottery Group, Olney, Maryland, 2011 (Draft report on testing stream restoration area, including Native American sites 44AX6 and 16)
- Gardner, William M., Kimberly A. Snyder, and Tammy Bryant, *Phase III Data Recovery Excavations of the Prehistoric Component of 44AX177 and 44AX176, Stonegate Development, Parcel C, City of Alexandria, Virginia*. Thunderbird Archeological Associates, Inc., Woodstock, Virginia, 1995. (Report on Native American site with major components from about 5000 years ago and about 3500 years ago)

- Gardner, William M., Kimberly A. Snyder, Tammy Bryant and Gwen J. Hurst, Phase II, *Archeological Investigations of an Historic Area Within 44AX177, City of Alexandria, Virginia*. Thunderbird Archeological Associates, Inc., Woodstock, Virginia, 1995. (Report on investigations of late 18th/early 19th-century tenant household)
- Gardner, William M., Kimberly A. Snyder, Tammy Bryant and Gwen J. Hurst, *A Fairfax County Tenancy: A Phase III Archeological Investigation of an Historic Area Within 44AX177, City of Alexandria, Virginia*. Thunderbird Archeological Associates, Inc., Woodstock, Virginia, 1996. (Report on excavations of late/18th/early 19th-century tenant household)
- Klein, Terry H., *Archaeological Reconnaissance Report, Winkler Tract Impact Area*, Alexandria Regional Preservation Office, Alexandria, Virginia, 1979. (Report on preliminary survey)
- Mullen, John P., Edward Johnson, and Annie McQuillan, *A Documentary Study and Archaeological Investigations of the Lynbrook at Mark Property, City of Alexandria, Virginia*. Thunderbird Archeology, Gainesville, Virginia, 2008. (Draft report on testing of Native American sites--44AX38 and 39 and area of domestic materials from the late 19th to early 20th centuries—AX203).
- Pfanstiehl, Cynthia, et al., *Winkler Tract, Phase I and II Archaeological Investigations*, Engineering Science, Washington, D.C., 1988. (Report on investigations at Native American site—44AX124)

Note: All reports by Adams and Gardner are available on line at the following link: <http://alexandriava.gov/historic/archaeology/default.aspx?id=33552>. Others are available at Alexandria Archaeology, 105 North Union Street, Suite 327, Alexandria, Virginia 22314.

**6. Is the proposed project consistent with community goals, such as proposed land use?**

The proposed ramp is located adjacent to several established residential neighborhoods. To the east, there are residential uses within approximately 300 feet of the proposed ramp. Therefore, if the ramp proposal proceeds, it is essential that elements such as noise, visual impacts and pedestrian circulation, as well as buffers, trees, landscaping and screening be considered as part of any ramp proposal. In addition, the height of the proposed ramp needs to be evaluated to determine potential impacts to the view

corridors/open space park (Winkler Botanical Preserve) to the west and the residential uses to the east.

The proposed ramp is located adjacent to the Alexandria West and the Seminary Hill/Strawberry Hill Small Area Plans. There is a community planning process which is currently evaluating potential revisions to land use and community goals surrounding the proposed ramp.

This project is consistent with the community goals for addressing traffic issues created by the currently constructed BRAC-133 facilities. The construction of the Transit/HOV ramp will help improve traffic operations on both Van Dorn and Beauregard Streets. However, there is concern that the construction of the ramp may result in significant increases in cut through traffic through the neighborhoods east of I-395 (this largely depends upon the movement allowed at the ramp terminus with Seminary Road). These impacts will need to be assessed.

**7. Will the proposed project be beneficial to the City of Alexandria?**

This project will have benefits for the City of Alexandria. The construction of the Transit/HOV ramp will allow transit vehicles and carpools coming from the south access the Mark Center area using the relatively uncongested I-395 HOV lanes. This will help incentivize single occupant drivers to use transit or form carpools. Furthermore, the provision of the ramp will help reduce the number of vehicles that traverse the congested Seminary Road rotary and the congested Seminary Road/Beauregard Street intersection. Vehicles using the Transit/HOV ramp will be able to access the BRAC facility and other facilities within the Mark Center area by turning left at Mark Center Drive and not having to traverse the rotary or the Beauregard/Seminary intersection.

**8. Does the proposed project appear to be compatible with the City of Alexandria's planning, including transportation plans and proposed highway development in the area?**

Yes, the proposed project appears to be compatible with the City of Alexandria's transportation plans. The transportation plan for the City emphasizes the need to implement multi-modal transportation enhancements. Because this ramp provides a connection to the I-395 HOV/Transit lanes to and from the south, the level of transit and HOV utilization is expected to increase significantly. The provision of the ramp will help reduce the dependence on single occupant vehicles to reach destinations within the vicinity of the Seminary Road interchange.

**9. Where does the proposed project rank in Alexandria's transportation improvement needs?**

The City of Alexandria Transportation Commission ranks funded, partially funded and unfunded transportation projects annually. Since this ramp is not an Alexandria project, it has not been specifically ranked by the Transportation Commission or staff. However, the City Council and the BRAC Advisory Group have indicated in the past the criticality of developing long term transportation enhancements which could help mitigate the impacts of the BRAC-133 facility and other development in the vicinity of the BRAC-133 facility.

**10. Is the City of Alexandria developing any mass transit options for this corridor?**

The City of Alexandria is developing plans for the implementation of a high capacity transit corridor along the Van Dorn Street/Beauregard Street corridor. This transitway corridor, which runs parallel to I-395, is expected to serve as a complement to the HOV/Transit ramp. It will provide additional infrastructure needed to help mitigate the impacts of the BRAC-133 facility and other developments in the vicinity. This transitway facility is included in the City of Alexandria Transportation Master Plan. Based on the preliminary recommendations of the City of Alexandria Transitway Corridor Working Group and the Transportation Commission, the Transitway would be operated initially as a busway with most of the running ways built on dedicated transit lanes. The transitway corridor alignment starts at the Van Dorn Metro Station, follows Van Dorn Street to Sanger Avenue and continues north on Beauregard to Shirlington and the Pentagon in Arlington County. The Bus Rapid Transit service would operate with high quality vehicles, fast and frequent service and would include high quality transit stations. This service would attract transit users at the sub-regional level while the HOV/Transit ramp is expected to attract new regional transit service with the corresponding new transit users.

**11. What is the position of the Planning and Zoning Department toward the proposed project?**

The proposed ramp should proceed to be analyzed as part of the environmental review process. It is critical for this process to include appropriate opportunities for the community and residents to review and comment on the proposal. Elements such as noise, visual impacts, loss of existing buffers, tree canopy and landscaping should be evaluated as part of the environmental process. In addition, if the ramp proposal proceeds, design solutions to minimize the impacts outlined above should be incorporated as part of the design and location of the proposed ramp.

**12. Are there any historic sites in close proximity to the proposed project?**

There are no known architectural or historic sites within the immediate disturbance area for this project, nor will the project likely be visible from any historic resources. In addition, there has been considerable previous extensive ground disturbance associated with several heavy periods of road construction: Shirley Highway in the 1930s; rebuilding of Shirley Highway several decades later as part of I-95, which later became I-395; and widening of Seminary Road and construction of the Seminary Road interchange. These construction activities would have destroyed any sites that might have been present within the project area. To provide demonstrable evidence of this disturbance, an analysis should be done comparing today's topography with that shown on a 1929 USGS map.

The enclosed map shows locations of sites in proximity to the proposed project. The closest extant sites registered with the Virginia Department of Historic Resources are 44AX6, 9, 11, 12, 13, 14, and 15. Discovered during a 1979 archaeological survey, these date to the pre-colonial period and may provide evidence of Native American activities. The relatively large number of Native American sites still remaining in this area relates to a lack of development along the streams and to preservation of the streams above ground within and near the Winkler preserve. Given this cluster of sites and the potential for interpretation of Native American life in a preserved natural area, the visual impact of the proposed height of the ramps from the Winkler preserve should be considered. (OHA)

**13. Are there any existing or planned recreational areas within the project area?**

There are several open space and recreational amenities within close proximity of the proposed ramp that consist of the following:

- Winkler Botanical Preserve is located on 44.63 acres with public walking trails open during the day. The preserve has a visitor center/retreat house and operates educational programs for local school students.
- Jerome Buddie Ford Nature Center provides year-round programs and exhibits on Alexandria's human and natural history.
- William Ramsay Recreation Center The recreation center includes a full-size gymnasium, game room, arts and crafts room, dance studio and fitness room.
- The Dora Kelly Nature Park is a 46- acre wildlife sanctuary with a one-mile nature trail that meanders along streams, wooded hills, and freshwater marshland in the Holmes Run watershed.
- Holmes Run Park includes a segment of Holmes Run, which begins near Route 66 and the Capital Beltway in Fairfax County and extends to Cameron Run in Alexandria.

Mr. Robert Iosco, Environmental Program Manager  
VDOT Northern Virginia District  
September 15, 2011  
Page 11

- Francis C. Hammond Schools multi-use fields are used by the community and students.

The open space – recreational amenity closest to the proposed ramp is the Winkler Botanical Preserve. Potential impacts to the Winkler Botanical Preserve such as noise and visual impacts need to be evaluated as part of the environmental analysis.

**14. Does the City of Alexandria have a preferred scheme of development for this project?**

The City of Alexandria prefers a scheme that can best mitigate the traffic concerns of the community generated by the BRAC-133 locating at the Mark Center, as well as address broader traffic operations and quality of life issues in the area.

In response to the general comments inquiry, the Alexandria Fire and EMS Department, the Alexandria Police Department, and the Office of Emergency Management support the proposed ramp project as it would result in improved access to the area for all public safety, public works, utility company, and relief agency vehicles allowing them to respond more efficiently to any emergency. This improved access would be a great benefit to building occupants as well as the entire area around the BRAC 133 facility.

Also, please find enclosed a number of comments the City of Alexandria has received from residents of our community with respect to the proposed HOV/Transit Ramp. These comments have been merely enclosed without any editing or changes. If you have any questions, please feel free to contact me.

Sincerely,



Bruce Johnson  
Acting City Manager

Enclosures: Dexter letter dated March 8, 2010  
Mayor Euille letter dated March 21, 2011  
Baier memo dated July 27, 2011  
Cultural Resources Map  
Compiled Resident Comments

Mr. Robert Iosco, Environmental Program Manager  
VDOT Northern Virginia District  
September 15, 2011  
Page 12

cc: The Honorable Mayor and Members of City Council  
Richard Baier, Director Transportation & Environmental Services  
Faroll Hamer, Director Planning & Zoning  
Adam Thiel, Fire Chief  
Mark Penn, OEM Coordinator  
Val Hawkins, President AEDP  
Earl Cook, Police Chief  
Sandy Modell, DASH Manager  
Lance Mallamo, Director Historic Alexandria  
Abi Lerner, Deputy Director T&ES  
David Grover, BRAC Coordinator