

Journey Through Hallowed Ground Position on Route 15 CPAM

SUMMARY

Route 15 safety and congestion can be addressed without adding capacity or degrading the Journey Through Hallowed Ground (“JTHG”) National Scenic Byway, which brings millions in tourism income to the county annually. We have submitted multiple studies showing that alternative designs can address the road’s issues in a way that enhances the byway and guarantees that future generations can enjoy the unique cultural landscape so richly preserved here in Loudoun by the tireless work of many citizens.

We encourage Loudoun County to design improvements with the preservation-for-prosperity values laid out in the JTHG Byway Management Plan, approved by Congress in 2009, and supported by regional, state, and local jurisdictions along its 180-mile length.

Specifically:

- We oppose changing the federal highway designation for Route 15 north of Leesburg to a controlled access 4-lane expressway and redesignation of Route 15 in Lucketts village as a major collector. Safety, access and flow can be addressed at much lower cost without degrading scenic and historic assets and business viability, and with less environmental risk in this fragile area.
- We support the intersection combinations of Montresor/Limestone School roads and New Valley Church and Spinks Ferry roads with roundabouts. (NOTE: the CPAM summary appears to be inconsistent regarding these realignments).
- We oppose the bypasses of Lucketts which threaten the historic village and environmental assets and is contrary to the Comprehensive Plan (especially regarding village small area plans).
- We propose for the historic village the much lower cost and efficient solution supported by VDOT and local citizens: a hybrid of the VDOT Performance Based Pilot Project presented to county staff in 2020 and Ian Lockwood’s 2003 traffic calming design for Lucketts (for which the \$3 million federal earmark was to have been used). This hybrid will make the road safer than a signalized four-lane highway, facilitate through traffic, discourage cut-through traffic, and serve village access needs.
- We urge the county to revise its substandard traffic demand model to meet federal standards—as the first step toward establishing a sustainable and fiscally responsible transportation policy.

NARRATIVE

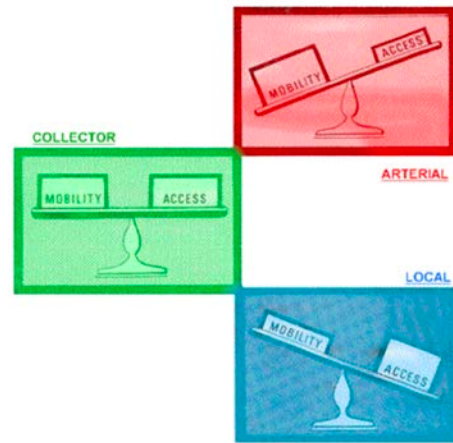
National Scenic Byways enhance economic prosperity on significant thoroughfares across the nation, because forward-looking planners have used all the tools provided in their byway management plans to protect the function of the byways and to highlight the historic, scenic, and cultural assets that attract tourism.¹

Visionary transportation planners nationwide also have learned the lesson that adding capacity does not reduce congestion. Increased capacity burdens jurisdictions with induced traffic, higher maintenance costs, increased pollution, and man-made climate change. It encourages sprawl and lowers quality of life for those who value the rural character of the road. Further, the pandemic has demonstrated that planners can take an aggressive demand management approach in the face of widespread telecommuting.²

The segment of the byway from White’s Ferry Road to the river is the most pristine segment of the 180-mile-long Journey Through Hallowed Ground Corridor, retaining the same route since its use as a Native American migration path before European settlement. Drivers cross the Potomac River bridge and pass through a beautiful tree canopy of the mountainside and past the farms, streams, and landscapes that have remained remarkably undisturbed.

This portion of the Journey Through Hallowed Ground National Scenic Byway from Leesburg to the Potomac River will prosper—or decline—according to the vision Loudoun holds for it.

We are concerned that the CPAM documents, as currently presented, diminish the assets of the National Scenic Byway. Principal Arterials (Other)—the redesignation the county seeks for Route 15—are described as “limited-access roadways that serve travel in a similar way to the Interstates.” This sacrifices local access for residents and visitors to high-speed travel for out-of-state traffic (see diagram)—up to Lucketts, where the County’s own documents show that a bottleneck up to the river will commence. Department of Transportation and Capital Infrastructure staff erroneously state that Maryland “has plans” to widen Route 15 through Frederick County’s rural preserve. (The Maryland Highway Needs Inventory, to which staff refers, contains hundreds of “highway needs” across the state; the document clearly states they are *not* plans.) No new bridge is listed even in that inventory. It is an inescapable conclusion that this \$300 million project will not accomplish what DTIC claims. Therefore, local access is being sacrificed for no purpose.³



These documents show that DTIC continues to reject substantive consideration for byway preservation as the engine for economic prosperity in the National Heritage Area laid out in the Byway Management Plan—despite the work of the Department of Economic Development to forward that aim, and the documented \$710 million in annual tourism income that the National Scenic Byway brings to the region.⁴

DTIC has erroneously portrayed preservation goals as competing with safety and congestion reduction. It has first evaded and then delayed historic asset reviews for Phase 1, and for Phase 2, has yet to commit to them. It has not coordinated with VDOT on two other Lucketts village projects or with village residents on a unified plan to economically solve congestion and walkability problems in the village. The County’s cover letter to this submission shows that DTIC continues on this path.⁵

While we have been disappointed that DTIC so far has not been directed to design improvements with those preservation-for-prosperity values laid out in the Byway Management Plan, we will reiterate here the vision—with the analysis and studies to back it up—of a safer, less congested road with better traffic flow that enhances Loudoun’s National Scenic Byway, for millions of dollars less and with greater benefit to resident citizens and the rural economy.

We are not asking the County to embark upon an unknown and untested approach. This model has achieved success twice in Loudoun: along U.S. Route 50 from U.S. Route 15 west in the early 2000s, and along Route 9 in Hillsboro last year—both award-winning projects. At modest cost, the projects improved safety, reduced congestion, and preserved the character of the countryside and rural villages that residents cherish. On Route 50, the predicted future volumes never materialized. The Route 15 South improvements presented this summer provide another model for Byway-compatible solutions.

We urge the Board of Supervisors to direct DTIC to modify the approach to addressing congestion, access, and safety in a way that preserves and promotes the byway’s economic prosperity.

PRACTICAL AND ECONOMICAL IMPROVEMENTS

SAFETY. Improved Route 15 safety is an imperative all citizens support. There are many strategies for improving safety on a National Scenic Byway and community Main Street that Route 15 is today. These design elements discourage speeding, demand drivers' attention, and provide much-needed access for emergency vehicles.

Replacement of signals (where angle crashes result in more injuries) with roundabouts promotes efficient and orderly flow. Where left turns must be made, raised medians provide drivers safe refuge from rear-ending.

- Roundabouts
- Part-paved, part-geogrid grassed shoulders
- Raised medians to protect left-turning vehicles

Since DTCI's decision is to increase the design speed of the road, it states that safety will be improved with a median, wide clear zones, wide paved shoulders and curtailed access for residents and farm vehicles (many of whom will not be able to make left-hand turns out of their driveways and farm lanes). We see no clear indication that this will improve safety; in fact, a four-lane signalized highway will increase, not decrease, the number of fatalities on the byway.

The 2006 Validation Study ordered by the Virginia Deputy Secretary of Transportation of Route 15 improvements up to Spinks Ferry Road showed that there were more accidents following construction of concrete medians and broad paved shoulders south of Whites Ferry Road. Illegal right-hand passing on the shoulders is now common. (We note that this study was not in the county's list of studies presented to the BOS.) An internal 2004 VDOT memo regarding spot improvements planned for intersections north of White's Ferry notes: "With planned improvements to the shoulders, we recognize that speeds will increase whether speed limits are changed or not."

With higher speeds and broad clear zones, Route 15 will be a faster road, but not a safer one—especially for visitors and residents. If visitors are allowed to turn left, it will be across two lanes of speeding traffic, lessening the likelihood they will stop to patronize local businesses. If business access is limited to right-in, right out, more customers will be lost. County residents will be inconvenienced in order to facilitate out-of-state traffic.

A safer and cheaper approach. Journey and its partnering coalition presented to former Supervisor Geary Higgins in 2018 an alternative approach to improving safety, flow, and access on Route 15, by the designer of Loudoun's other successful traffic calming projects, Ian Lockwood. Included in that presentation was an analysis showing that a single-lane roundabout at White's Ferry would successfully handle present and future traffic without 4-laning. Lockwood's extensive career and national reputation for establishing prosperous and livable communities through road design is unquestioned.⁶

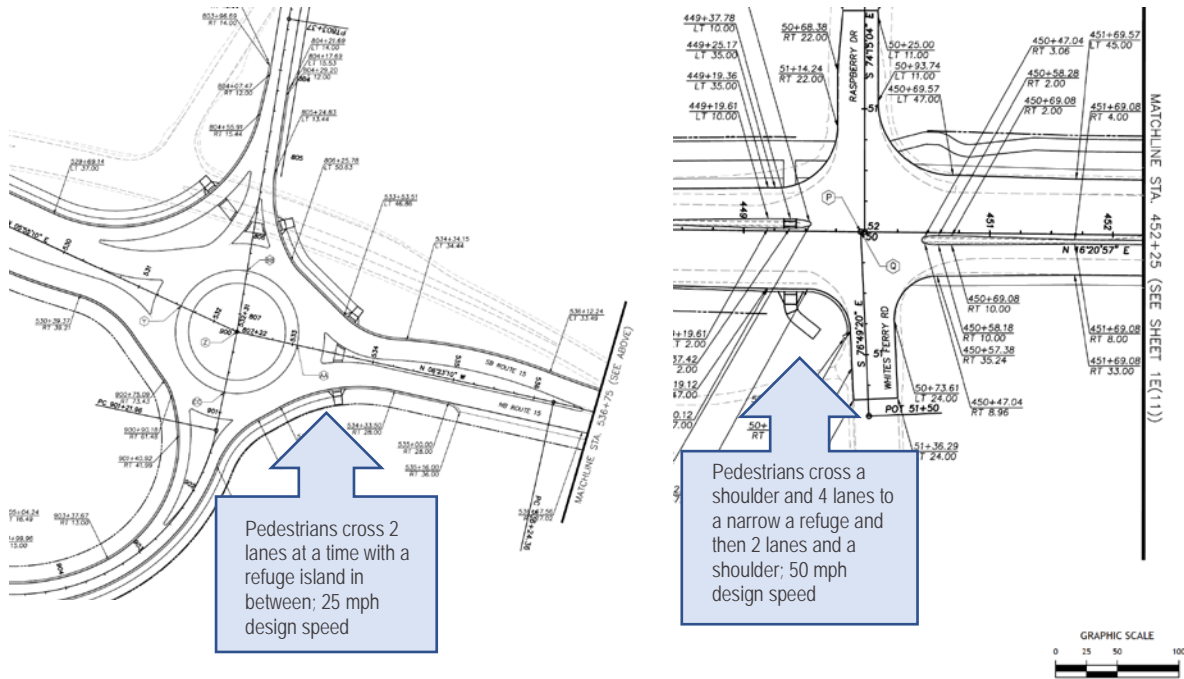
County staff subsequently contradicted the roundabout analyses, repeating incorrect information about roundabout access (that some Raspberry Falls residents continue to believe today), including:

- stating that it would cost \$8 million (more than a signal), despite a similar roundabout being recently built in another part of the county for just \$1.9 million,
- claiming a roundabout and signal were equally safe,
- stating that the center circle of a roundabout would have to be 150-220 feet in diameter to accommodate trucks,
- declining to factor in long-term cost savings a roundabout would bring (reduced maintenance, reduced emissions (a Maryland study concluded that for every dollar spent on roundabout construction, \$14 was saved in costs over the life of the roundabout)).⁷

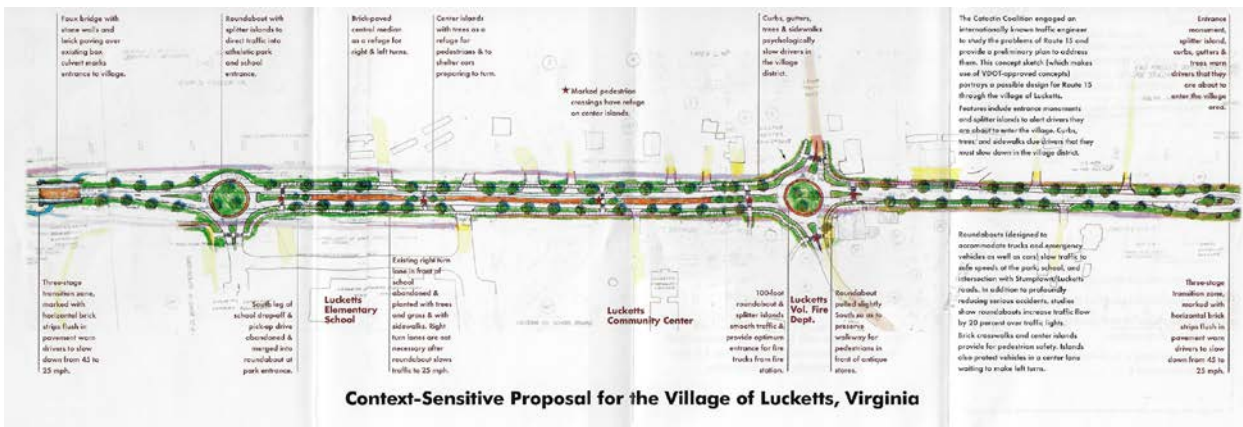
The county did state accurately that a roundabout would have a better level of service than the signal.

In a 2019 report to the BOS, county staff stated that “It would be very difficult for bicyclists and pedestrians to safely cross Route 15 at a two-lane roundabout because they will have a larger area to cross and the traffic will not stop.”⁸

Below are images of the 60% design plans for the Montresor roundabout and the White’s Ferry signal from Phase 1. Cyclists and pedestrians in fact will have four lanes to cross at once at the signal—two through and two turn lanes—and just two at the roundabout. The design speed at the signal is 50 mph; at the roundabout it will be 25 mph. Pedestrian signals can be installed at roundabouts as well as at signals.



Regarding a roundabout on Route 15 in Lucketts (part of Ian Lockwood’s 2003 plan for the village), DTCI staff stated in 2019 to the BOS that it “would require demolishing both antique[sic] stores.” It would not. They stated “it is staff’s opinion that the inscribed circle would need to be 130-180 feet wide based on vehicle type WB-67.” WB-67 vehicles are not permitted on Route 15. Toole design’s White’s Ferry RAB inscribed circle is 100 feet in diameter. The roundabouts on Route 15 and Route 50 at Howser’s Branch Road have a 100-foot inscribed diameter. They accommodate WB-65 trucks, which *are* allowed on Route 15.⁹



Lockwood’s plan for Lucketts would facilitate the orderly and safe flow of traffic, and sharply reduce congestion that drivers now experience at the signal.¹⁰

We request that the BOS direct DTCI to work with rural and village residents to incorporate roundabouts and traffic calming on Route 15 in Lucketts Village, using a consultant experienced in traffic calming and scenic byway design.

CONGESTION & CAPACITY. As the narrative states, Loudoun County initiated the Route 15 widening projects because of congestion and delays at peak hours. Those delays are unquestionably caused by the signals at White's Ferry Road and in Lucketts, as the Kimley Horn studies show. Additional delays occur from accidents along the highway where shoulders are narrow or nonexistent, and where emergency vehicles have difficulty accessing incidents and rerouting traffic.

Roundabouts will sharply ease the congestion issues. Improved shoulders will sharply aid the response to accidents, allow rerouting of traffic, provide for speed enforcement, and improve the traffic flow.

The County's claim that the road is "over capacity" is, in the most practical sense, inaccurate, because the number of vehicles that travel the road now do travel the road. The decision for a visionary planner (especially given what the pandemic has shown) should be what is a practical and sustainable capacity for the present and the future, with a vigorous demand management and transit plan that gets as many single-occupant vehicles off of the road as possible. The county has made limited mention of this strategy; it should be aggressively pursued.¹¹

Adding lanes to Route 15 will not remedy congestion, as innumerable studies nationally show (see endnote 2). First, as noted earlier, the bottleneck just moves north to a bridge that will not be widened. In 2018 The Journey coalition engaged the national traffic modeling firm Smart Mobility Inc. to provide an independent analysis of the County's traffic demand model used for the Route 15 study. This firm also provided a critical review of the 2010 Countywide Transportation Plan draft.¹²

Smart Mobility details in the 2018 study what the result of this expensive project will be:

...the county's traffic evaluations of the two concepts fail to adequately capture just how significantly widening in both concepts would induce new travel along Route 15 and therefore create new backups outside of the widened portions. The result is that the county's analysis significantly exaggerates the benefits of widening Route 15 and underestimates the new traffic problems it would generate. When the full extent of induced travel is taken into account, it is clear that while the additional capacity from widening may appear to help address existing bottlenecks on Route 15, it simply shifts them upstream of the widened portions.

Further, the report shows that subsequent to construction, induced travel will balloon trips on the highway.

Figure 4: 2040 Southbound Morning Peak Period Traffic Growth from 2016:
Modified Concept B versus Traffic-Calming Alternative



A conservative approach, which aligns with the Comprehensive Plan in effect at the time, would have replicated the approach set forth as the model for rural arterials, seen today on the Route 50 and Route 9 Traffic Calming projects.¹³

PUBLIC ENGAGEMENT. County staff have repeatedly emphasized the “robust” public input process it conducted. However, the conclusion was front loaded (with adding capacity presented as the only solution to congestion), and congestion reduction, safety, and preservation described as competing instead of compatible goals (see endnotes 5 and 14).¹⁴

The County’s surveys had no control questions, could be taken multiple times by anyone (and the zip code maps in the summary (the county declined to share the raw data) show that hundreds of participants are unlikely to commute on Route 15). The stakeholders group was disproportionately represented by the newest HOAs, with most rural residents (and the owners of Rockland, which owns substantial land on both sides of the byway) excluded. While no Lucketts residents were asked about bypasses or ways to improve Route 15 in the village, Leesburg HOA representatives were (see endnote 7).

Further, staff has claimed strong public support of its approach when the survey produced the answers that aligned with its predetermined outcome, but it has ignored survey results when they were contrary to its those plans (e.g., roundabouts at various locations along the corridor). In this CPAM, for example, staff forwards the western bypass for Lucketts, when by a 3 to 1 margin survey respondents preferred the eastern bypass.

SUMMARY

The Board of Supervisors has a choice. It can replicate for its National Scenic Byway the successful models of the Route 50 and Route 9 projects, and protect a local and regional economic jewel and its historic landscapes. The BOS has an opportunity to be a leader in innovative traffic solutions and road design. It can adopt a progressive yet fiscally conservative approach to traffic management and road design that saves lives, protects communities, and promotes local business.

We believe that the current Board of Supervisors has the vision, courage, and sense of stewardship to travel along that better road.

The Smart Mobility summary concludes:

Decision-makers, business owners, and residents alike would be wise to engage in the debate over widening Route 15 with their eyes wide open. Once one portion is widened to four lanes, the new bottlenecks it generates upstream will generate pressure to widen the next segment. This pushes the county into a wasteful and repetitive cycle of successive and expensive widening projects that yield unsatisfactory results. Route 15 becomes a larger and more dangerous highway primarily designed for regional travelers, while the historic character of the corridor is destroyed, local access is limited, and congestion remains. It is best to stop this cycle before it gets started. The far more prudent and responsible approach is to forego the widening alternatives, and instead intentionally manage traffic flow on Route 15 with traffic-calming improvements and roundabouts.

ENDNOTES

¹ Scenic America. “Scenic Byways Benefit Local Economies.” Accessed at <https://www.scenic.org/visual-pollution-issues/scenic-byways/benefit-local-economies/>.

² See, for example, Transportation for America. “The Congestion Con.” 2020. Accessed at <https://t4america.org/maps-tools/congestion-con/>. Streetsblog.org. “The Science Is Clear: More Highways Equals More Traffic. Why Are DOTs Still Ignoring It? Accessed at <https://usa.streetsblog.org/2017/06/21/the-science-is-clear-more-highways-equals-more-traffic-why-are-dots-still-ignoring-it/>

³ VDOT. “Functional Classification Comprehensive Guide.” Accessed at https://www.virginiadot.org/Functional_Classification_Comprehensive_Guide.pdf. Maryland State Highway Administration. “Maryland Highway Needs Inventory: Frederick County.” Accessed at https://www.roads.maryland.gov/oppen/hni_Fr.pdf.

⁴ Tripp Umbach Inc. “National Heritage Areas: Sustaining Regional and Local Economies.” Economic impact study supported by the National Park Service.

⁵ The Round 1 public survey asked respondents to rank, in order of importance, congestion relief, safety, access, preservation, bike/ped, and beautification. JTHG Coalition, March 2, 2021. “Joint letter to Loudoun BOS on Route 15 requirements.” DTCL. March 16, 2021. “Response to 030221 Letter from JTHG_SELN_NTNP_CSG_PEC_PEC_CC.” VDOT. Route 15-Village of Lucketts-Loudoun Co: Performance Based Planning Pilot.

⁶ Ian Lockwood, PE, Toole Design Group. May 24, 2018. “Learning from Loudoun’s Route 50 Traffic Calming Project, a National Model,” and “180831 Route 50 and Route 15 Presentation by Ian Lockwood June 22, 2018.”

⁷ Documents presented to Route 15 North stakeholders group, including DTCL notes of meetings, presentation materials, and moon chart evaluating intersection controls. Unanswered requests from stakeholder members.

⁸ DTCL. September 20, 2018. Item 7. Route 15 - Congestion Report Improvements, BOS Business Meeting.

⁹ DTCL. July 123, 2019. “Item 6. Route 15 Safety and Ops Study July 12 2019.”

¹⁰ Catocin Coalition. “On the Road to a Safe, Scenic, and Sensible Design.” Brochure.

¹¹ Northern Virginia Transportation Authority. July 9, 2020. “TransAction, Northern Virginia’s Transportation Action Plan for Northern Virginia. COVID-19: Transportation Impacts and Opportunities.” Accessed at https://thenovaauthority.org/wp-content/uploads/2020/07/5.NVTA_R2S-Scenario-Planning_Draft-Presentation_7-8-20_v3.pdf

¹² Smart Mobility Inc. 2010. “Review of the Loudoun Countywide Transportation Plan.” Smart Mobility Inc. 2018. “Route 15 North of Leesburg: A Closer Look at the Effects of Widening.”

¹³ From the 2010 CTP: “The County fully supports the US Route 50 (John Mosby Highway) traffic calming project that was federally funded in the 1998 TEA-21 bill as a national model in rural traffic calming. A goal of the project is to serve as a model for similar projects in other areas of the County as a means of providing safer communities at cost savings. Traffic calming is in keeping with the goal of preserving the scenic and historic value of the Rural Policy Area.”

¹⁴ Kimley Horn. May 10, 2017. Scope of Work letter. “Route 15 Corridor Study, Town of Leesburg (North Limits) to the Maryland State Line.” Excerpt: “The previous Countywide Transportation Plan (CTP) had proposed corridor capacity improvements, however, these were removed before the plan was adopted” [page 1]. This refers to the lobbying firm Northern Virginia Transportation Alliance’s submission of a map with a new multiline highway in the Route 15 corridor, submitted after the public input session ended and accepted by county staff into the draft Countywide Transportation Plan Update. It was removed following public uproar.