

Route 15 North Case Study, Loudoun County, Virginia

MARTHA POLKEY, THE CATOCTIN COALITION

OVERVIEW

Forward-looking state and metropolitan area departments of transportation, propelled by

- unsustainable financial burdens of ever-expanding infrastructure needs,
- environmental considerations including climate change, and (most recently)
- corporate shifts in telecommuting policies and reassessments of needs for centralized office space as a result of the pandemic,

are shifting transportation policies to better and more fiscally responsible approaches to land use and transportation problems. Many of these new approaches align with the Washington Metropolitan Area Council of Governments' (COG) Vision 2045 Aspirational Goals for the region.¹

Many state transportation policies are shifting from a Level of Service metric evaluating road performance, which dictates high public expenditures for widening roadways to address peak period travel only, to the Vehicle Miles Traveled metric—a model that rewards multimodal, telecommuting, and flextime employment options. The failure of road-widening projects to alleviate congestion is well documented, with a return of congestion within 5 years of capacity addition, due to induced traffic. And Virginia's Highway Safety Improvement Office's program for reducing highway deaths has encouraged engineering designs such as roundabouts and lower-cost designs that effectively reduce deaths and injuries.

Loudoun lags significantly in its embrace of these fiscally sustainable and more effective policies. With an ever-expanding county transportation budget, Loudoun is forging ahead with rural arterial widening projects, claiming that the arterials are over capacity, that future travel demand modeling shows they must be expanded, that widening is the only solution, and that congestion problems will be solved with increased capacity.

Route 15 north of Leesburg was the first arterial on which the county executed this new road expansion policy, in 2018 and 2019.

SUMMARY

U.S. Route 15 through Loudoun County has been a battleground between preservation and development interests for at least four decades, with repeated regional "outer beltway" attempts countered with critical technical analyses debunking the promised reductions in congestion, and alternative solutions to preserve the agricultural economy and boost tourism along the corridor. The countryside it bisects north of Leesburg was designated as the Catoclin Rural Historic District in 1987, with the road itself designated a Virginia Scenic Byway in 1988. In 2008 Congress passed and President George W. Bush signed into law its designation (from Gettysburg to Monticello) as a National Scenic Byway within the Journey Through Hallowed Ground (JTHG) Region. A federally approved Byway Management Plan detailed best management practices for the segment, including how to address safety and improvement needs.

A long-delayed update of Loudoun's Comprehensive Plan and Countywide Transportation Plan in 2016 provided impetus for finally fulfilling the vision of a National Scenic Byway's economic value as a tourism opportunity while improving safety, access, and flow.

Citizens along the 11-mile-long corridor and in the historic village of Lucketts hoped for a comprehensive redesign that would follow the award-winning Route 50 Traffic Calming model—then enshrined in the County's Comp Plan² as a successful and economical approach enhancing its tourism value, local business prosperity, and scenic and historic qualities, while addressing access, safety and congestion. (The Catoclin Coalition had advocated for this approach since 2001, and gained \$3 million in federal funds in 2003 to initiate a project in Lucketts toward this end. But the design produced for the village by the Route 50 designer was rejected by the county; it substituted VDOT's original plan, which sacrificed village commercial,

school, and residential needs for safe access for vehicles and pedestrians in favor of improved flow for interstate traffic.)

But county documents show that long before any public input, the county planned to expand capacity and transform the byway into an expressway, sacrificing access to speed, sacrificing the corridor's tourism economy to commuter traffic, and sacrificing the county's citizens strong support of preserving farmland to laying the groundwork for additional housing and commercial development in Western Loudoun.

A Department of Transportation and Capital Infrastructure (DTCI) staff report, which followed the Transportation Summit in June 2017, asserted that traffic demand modeling showed that Loudoun rural arterials were or would soon be over capacity, and did not meet VDOT's road design standards. The "safety and operations" studies for Route 15 North began not with the federally approved JTHG Corridor Management Plan process for addressing necessary highway updates on National Scenic Byways. It began with the highway-expansion model sought by the development-industry-financed road-building lobby Northern Virginia Transportation Alliance, and presented adding capacity as the only solution for solving the congestion and safety issues. Staff disregarded Maryland's clearly stated intent to retain the 2-lane bridge across the Potomac and lack of plans for roadway expansion north of the river. It ignored the Comprehensive Plan policy to use the Route 50 model.

Its planned design for the road to become an expressway meets the desires of the local and regional development industry for greater capacity on north-south arterials through rural areas outside the Washington metro area, which provides the crucial infrastructure essential for more outward sprawl development in Virginia and Maryland.

The "stakeholders" group assembled disenfranchised two-thirds of rural residents in the area who would be directly affected by changes to the road. Farmers, environmental organizations (the corridor is in a Limestone Overlay District with 14 stream crossings), the county's tourism organization (Visit Loudoun, which oversees \$1.8B annual tourism revenue largely from scenic and heritage tourism), its economic development department, and its own preservation staff were excluded.

There were no local community-based education or visioning meetings along the corridor. Established citizen commissions (e.g., the Rural Economic Development Committee, the Heritage Commission) were excluded. Online surveys did not control for bias. Staff did not oversee outreach by stakeholders, provide a suggested format for such outreach, or even monitor whether any outreach occurred. The County declined to explore congestion mitigation/demand management strategies with the public, the stakeholders group, Maryland's DOT, or elected officials. Instead, it presented congestion mitigation and safety vs. preservation as a zero-sum game.

The stages of "public input" were crafted to support a predetermined outcome of adding lanes, with plans for amending the County's comprehensive plan to redesignate the 2-lane rural arterial as a 4-lane expressway, and regional, federal, and state funding requests submitted out of public view months prior to and independent of the public process (see timeline for detail).

County staff misrepresented to the public, elected officials, and funding entities points of fact about the project and its impact, used substandard traffic modeling that underestimates induced traffic, failed to engage Maryland on a meaningful interstate transit-oriented approach to reducing the interstate traffic (80% of the volume) which that state offered, and refused professional engineering alternatives that would mitigate safety and congestion without damaging the byway's attributes and economic viability.

The county has instead embarked on an expensive road-widening trajectory that continues a wasteful and repetitive cycle of successive and expensive widening projects that yield unsatisfactory results. "Route 15 will become a larger and more dangerous highway primarily designed for regional travelers, while the corridor's historic character and its tourism economy is destroyed, local access is limited, and congestion remains."

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In response to increasing congestion, much of it resulting from queuing at signals and most of the rest from accident delays exacerbated by lack of trafficable shoulders, Loudoun County in 2017-2019 initiated a two-phase, nearly \$400M sprawl-inducing road-widening project on its National Scenic Byway, U.S. Route 15, in a decade-old National Heritage Area that will degrade both its scenic and tourism-generating assets. In doing so it has ignored federally established templates and guides for updating scenic assets facing traffic challenges. It misled the public, elected officials, and transportation funding entities. It reclassified the 11-mile-long rural arterial as a Level 3 Expressway up to a 2-lane Maryland-owned bridge there are no plans to widen, at the same time it declined to act on a Maryland offer to coordinate on a transit approach.

As flawed and expensive as this approach is, it was a politically expedient choice for elected officials facing the ire of constituents stuck in traffic, put before them by a transportation planning staff that has embraced wholesale road expansion promoted by development interests. Nationally, transportation analyses have repeatedly shown that spending millions to make highways wider and faster fails to solve congestion. More progressive (and cash strapped) jurisdictions have consequently made a shift toward demand management, replacing “level of service” metrics for gauging transportation improvements with “vehicle miles traveled” measures.

The County is replicating the Route 15 North model for studies of its other 2-lane rural arterials: Route 15 south of Leesburg, Route 50 west of Route 15, and Routes 287 and 9. It is important that citizens as well as local, state, and federal policy makers work to supplant this expensive and futile model with a fiscally sustainable approach to transportation improvements that aligns with best transportation planning practices in the nation.

This report focuses on county-level failures in transportation planning for Loudoun’s National Scenic Byway, but there also are state-level issues to be addressed. VDOT continues to prioritize improvements by Level of Service standards instead of Vehicle Miles Traveled metrics. And Virginia’s weak Scenic Byways Program includes no strategic plan for preserving and enhancing byways with an economic development program. (Virginia’s state tourism website does not even list the 12-year-old JTHG National Scenic Byway.)

Following is a discussion of some of the failures of process, of transportation planning, and of county government transparency that characterized the 2017-2019 Route 15 North project. Supporting materials include a chronology of events prior to and during the project, and an appendix. Additional documents and resources noted in the text and timeline are available upon request.

PRIOR HISTORY

U.S. Route 15 in Loudoun County has long figured in the decades-long conflict between opposing interests at the western edge of the Washington Metropolitan area (see Chronology, “Project Prehistory”).

Development interests have sought its designation as an outer beltway, a Corridor of Statewide Significance, and a section of a new “river to river” Outer Beltway, which would open up new swaths of farmland to housing development.

Local landowners, partnering with preservation and conservation interests, succeeded first in acquiring state historic designations (Catoctin Rural Historic District and Virginia Scenic Byway) and then in achieving National Scenic Byway status for the road as well as national (Journey Through Hallowed Ground National Heritage Area), seeking to retain the rural area and the historic and scenic attributes along the scenic byway that support tourism, small business, and viability of agricultural operations and infrastructure. For nearly three decades they have requested context-sensitive safety improvements designed for such roads, and have been joined by smart-growth groups advocating for development constraints and tighter transportation land-use planning to replace costly cycles of sprawl.

Loudoun County Boards of Supervisors over the past two decades have swung between majorities amenable to intensive sprawl development and majorities favoring growth constraints and rural preservation:

- The 1999-2003 BOS initiated growth constraints with downzoning of the western county and a Purchase of Development Rights (PDR) program.
- The 2004-2007 Board scaled back the downzoning, eliminated the PDR program, and approved thousands of new houses and expanded sewer and water into the Transition Area.
- The 2008-2011 BOS endorsed the Journey Through Hallowed Ground National Heritage Area with Route 15 through the county as a National Scenic Byway.
- The 2016-2019 BOS finally put the county on the path to abandoning the National Scenic Byway altogether—amending the Comprehensive Plan in 2019 to redesignate it as a limited-access expressway—up to a 2-lane bridge owned by Maryland, which has firmly held that neither the bridge nor the highway above it is likely to be widened in future decades.

ROUTE 15 NORTH PROJECT

ScenicAmerica.org lays out an open-ended process for ensuring that a byway's basic attributes and the economic values it can bring to a community are realized, as improvements are planned:

A community design workshop is a great way to introduce local residents, business owners, developers, and officials to the benefits of good design. Invite town planners, landscape architects, historic preservationists, developers, and architects to deliver presentations on how your community can adopt good design principles to protect, enhance, and maintain [the scenic byway's] character.

The Federal Highway Administration sets forth these public input process guidelines for context-sensitive design along National Scenic Byways when road improvements are planned. These are replicated in the JTHG Corridor Management Plan:

The stakeholder group will:

- Strive towards a shared stakeholder vision to provide a basis for decisions.
- Demonstrate a comprehensive understanding of contexts.
- Foster continuing communication and collaboration to achieve consensus.
- Exercise flexibility and creativity to shape effective transportation solutions, while preserving and enhancing community and natural environments.
- Follow the process through construction.

The president and CEO of The Journey Through Hallowed Ground Partnership met with Loudoun County's Department of Transportation and Capital Infrastructure (DTCI) in autumn 2016 and requested that the JTHG Corridor Management Plan be the template for the improvement process. The Catoctin Coalition, acting separately, sent a letter to BOS Chair Phyllis Randall in October 2016 and made a presentation in May 2017 asking that JTHG guidelines be followed for a corridor-long redesign, listing available resources to facilitate planning:

- *When Main Street is a State Highway* (Maryland State Highway Administration)
- *Community Guide to Planning and Managing a Scenic Byway* (Federal Highway Administration)
- *Better Models for Development in Virginia* (Ed McMahon, The Conservation Fund)
- *Flexibility in Highway Design* (Federal Highway Administration).

But DTCI incorporated none of these templates or resources, despite the 2008 BOS endorsement of JTHG, and the important role that the historic and scenic attributes of the County's rural west have in bringing to Loudoun \$1.8 billion annually in tourism revenue—much of it heritage and agricultural tourism. The County also ignored the 2010 Loudoun Countywide Transportation Plan's enshrined traffic calming model for rural arterials (the end result of another grassroots community vision that countered another VDOT road expansion initiative).

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.

AN OUTER BELTWAY SEGMENT AND ROAD EXPANSION TO PROMOTE DEVELOPMENT

DTCI early in 2017 began the Route 15 project by directing the consultant, Kimley Horn, to focus on highway expansion, a primary goal of the development industry's outer beltway goal.³ The consultant's scope of work letter, following initial consultations with DTCI staff, refers to the added capacity that in 2007 was placed in the draft Countywide Transportation Plan update for Route 15 north and south of Leesburg after a private meeting with the director of the development lobby Northern Virginia Transportation Alliance (NVTAlliance). (The lobbyist's plans were removed following public uproar).

The outer beltway goal was further hinted at in February 2017 in the document published at the start of the Loudoun Comprehensive Plan update, the "Envision Loudoun Foundations Report." It erroneously describes Route 15 as a Corridor of Statewide Significance, part of the "river-to-river" outer beltway corridor sought in 2010 by Commonwealth Transportation Board members. That initiative ultimately failed. (Kimley Horn conducted the study for that proposed expansion, "Northern Virginia North-South Corridor of Statewide Significance – Corridor Master Plan," 2013.)

Capacity expansion was the sole solution offered to the public for solving the congestion and safety issues on the road, and the public outreach, traffic modeling, and design process pursued aligned with the county's initial directive prioritizing adding lanes. Maryland has made clear for decades it has no plans for adding a new river crossing west of the Capital Beltway, which it reiterated in a Feb. 2, 2018, meeting with DTCI staff. Maryland instead offered to partner with Loudoun on a demand management initiative using transit to reduce interstate traffic (which is 80% of the 26,750 peak volumes at the Route 15 bypass split north of Leesburg). But Loudoun declined to embrace interstate demand management as the strategy to address congestion.

By the spring of 2017 the county was preparing an amendment to the Countywide Transportation Plan (CTP) to 4-lane Route 15 to Montresor, prior to any public input. It was presented to the BOS in June.

A SECRET FAST TRACK OF COMP PLAN CHANGES AND FUNDING APPLICATIONS

At each step of the process, the county withheld from the public and stakeholders details of the widening plans it had decided upon.

1. The June/July 2017 survey of citizens on Route 15 asked if they were in favor of 4-laning Route 15 to White's Ferry Road (which in 2001-2002 had been paved at a 5-lane width, with a wide concrete median constructed on the center roadbed). Seventy-six percent approved. But the County already was preparing a proposal to the **Transportation Planning Board (TPB) an air quality study proposal for 4-laning** an additional 1.6 miles north, to Montresor. In October, DTCI erroneously claimed to the Board of Supervisors that 76% of citizens supported 4-laning to Montresor Road. So informed, the BOS approved DTCI's proposal to implement that 4-laning plan. The Route 15 stakeholders group had not approved the change. Owners of historic properties between White's Ferry and Montresor roads were not notified. At the end of October DTCI and VDOT submitted the air quality study proposal to the TPB. *Neither the proposal nor announcement of it was placed on the Loudoun.gov/route15 webpage.*

2. By November 2017 DTCI had finalized the **County Transportation Plan Amendment (CPAM)**. The intent to amend or the amended text was not shared with the Route 15 stakeholders; *the amended text was not included in the newspaper announcement or shared on the Loudoun.gov/route15 webpage.* Unknown to the public until the BOS packet was released the Friday before the vote was that the new 4-laned section would sharply limit access for residents and businesses along the 4-lane segment.

3. In December 2017 DTCI submitted to the **Northern Virginia Transportation Authority a Six-Year-Plan funding request** for an \$80M project to 4-lane Route 15 from Battlefield Parkway to Montresor. *It was not*

shared with the stakeholders or public, or announced on the Loudoun.gov/route15 webpage. The submission states that 4-laning 3.6 of the 11 miles to the Potomac River bridge will result in “an improved connection between the two states.” It asserts that 4-laning Route 15 up to Montresor will reduce instead of increase commuter cut-through traffic using Montresor to avoid the queueing on Route 15 at the Lucketts village signal. No origin and destination studies verify the claim.

4. After two March 2018 public input meetings and a countywide survey that prioritized 4-laning further north as the sole solution to congestion and safety, and queried participants countywide on limiting access, in May the county released the ***new draft Countywide Transportation Plan which lists Route 15 not as a rural arterial but as a Principal Arterial – Expressway***, a federal designation defined as “A divided highway facility with partial control of access and two or more lanes for the exclusive use of through traffic in each direction; includes grade separations at most major intersections.” *It was not shared with the stakeholders or public, or announced on the Loudoun.gov/route15 webpage.* Contradicting this planned change, a month later in June, DTCI’s Susan Glass informs Route 15 stakeholders that there were “No additional capacity improvements north of Montresor Road are proposed with the draft CTP at this time.” Removed from the draft CTP was the language encouraging the Route 50 traffic calming model for Loudoun’s other rural arterials.

5. On May 8, 2018, DTCI initiated a ***VDOT Smart Scale application*** to 4-lane Route 15 to Lucketts with a western bypass around two trailer parks and other residences, with limited access up to St. Clair Lane. A March public input session presented the bypass (first proposed by a developer years before; another developer is now pursuing development there) as a necessary option. *No directly affected property owners were notified*, and the current CTP did not allow for the change. *It was not announced on the Loudoun.gov/route15 webpage, or to stakeholders or the public.* (The final submission was made on Aug. 6.).

6. On May 19, 2018, DTCI initiated a ***federal BUILD grant funding application***, which includes an assertion that the county believes it can secure exemption from National Environmental Protection Act requirements (integral to a National Scenic Byway’s preservation). It makes no mention of the limestone karst geography. It also emphasizes the congestion relief that the project will achieve for interstate travelers—without noting that the Potomac River bridge and several miles north and south of it will remain 2-lane. The county states that greater safety will be achieved not by traffic calming but by limiting access for local residents. The application notes that a new 14-pump gas station—then still unapproved by the BOS and strongly opposed by citizens—is the type of commercial strip development planned for the historic corridor. (It was approved 8-1 in July 2018, and by year’s end citizens learned that a 7-11 franchise would be a new feature of the National Scenic Byway.)

7. On June 5, 2018, the ***BOS approved, on the consent agenda (no public discussion), the BUILD grant application’s submission.***

8. On July 3, 2018, the BOS approved 7-1 the 14-pump ***gas station near the base of Furnace Mountain***, despite the filing of an appeal to the Board of Zoning Appeals. The vote was in violation of Virginia Code § 15.2-2311. “Appeals to Board,” which states that appeals should be settled before a rezoning is voted upon.

9. Upon release of the Sept. 20 Board packet, the County’s preservation staff learns that in Route 15 Phase 1 item, ***federal funds (and thus requirements for historic and environmental reviews) have been removed from the project.*** Preservation staff queries about the change were directed to Catoctin Supervisor Higgins’s office. County staff erroneously state (in response to a FOIA request) that the federal earmark requires the funds be used for Lucketts (but the earmark language in the *Congressional Record* simply states they are for “safety on Route 15”).⁴ They state there was no formal response to the county’s letter to VDOT requesting use of the federal funds in Phase 1. A later FOIA shows a March 16 email exchange between VDOT engineers, in which Jim Zeller (who welcomed removal of the funds in the February 2018 stakeholders meeting) has found a way to avoid using the funds and thus evade the reviews. “I figured you will find a way,” replies the other engineer.

The BOS votes 9-0 to approve Phase 1, **4-lane Route 15 up to Montresor and to retain the signal at White's Ferry** instead of constructing a roundabout (the preference of 78% of citizens surveyed), despite its greater safety, better level of service, and statewide VDOT policy.

The Board of Zoning Appeals on Sept. 20 declined to grant the appeal on the rezoning of the 14-pump gas station, acknowledging that the environmental risks presented had great merit, but that the applicant had followed the county's weak zoning requirements and the BZA therefore had no grounds to grant the appeal.

10. In April 2019 the Phase 2 Safety and Operations Report was submitted to the County. *It was not announced on the Loudoun.gov/route15 webpage, or to the public* (the stakeholders group had been disbanded). Supervisor Higgins refers to it in a May constituent newsletter but provides no link to it. The report states **that Route 15 to Montresor is now an "urban roadway" and states that Route 15 must be widened to "accommodate future development,"** despite the area's AR-1 zoning designation sharply restricting development.

11. On June 21 the BOS voted 8-1 to approve **a new Comprehensive Plan, transforming the National Scenic Byway into an expressway.**

12. On July 18 the BOS voted 6-2-1 to **4-lane Route 15 to Lucketts and restrict access to beyond St. Clair Lane.**

A PUBLIC OUTREACH EFFORT CALIBRATED TO APPROVE PREORDAINED DECISIONS

It began not with a local community educational and visioning process laid out in the CMP, or education about balancing safety, access, and flow to improve function, or discussion of tailoring improvements to preserve the economic value of the National Scenic Byway (which Loudoun's Economic Development department had promoted and local small business owners already had embraced).

1. The public process focused on capacity addition as the only solution to congestion and safety.

- Its initial countywide public outreach meetings and public survey in June-July 2018 simply asked citizens to rank the importance of reduced congestion and increased safety vs. preservation and "beautification" as a zero-sum game. It asked citizens if they favored four-laning Route 15 up to White's Ferry Road (concealing that the County already was preparing a Comprehensive Plan Amendment to allow 4-laning up to at least Montresor Road, 1.6 miles further north).
- Public presentation maps did not note JTHG National Heritage Area or Catocin Rural Historic District boundaries, or contributing historic structures.
- No information was presented on the economic value that tourism brings to Loudoun or that a National Scenic Byway brings to the community.
- The county did not respond to a warning from a Federal Highway Administration staff member specializing in scenic byways that the public process failed to begin with an assessment of the corridor's resources.
- Second and third outreach sessions also prioritized adding capacity, and surveyed participants on adding new roadside features incompatible with preservation and context-sensitive design (such as noise-mitigating berms, new fencing, and post-mounted banners). Residents countywide were asked how much they would like to restrict access for local property owners.
- Its online surveys were not designed to control for survey bias or abuse, and included no control questions.

2. The public outreach process stakeholder group poorly represented rural economic interests or local constituencies, particularly lower income ones.

- Stakeholders committee was dominated by new homeowners associations (12 of 19 seats), leaving two-thirds of rural residents with no direct representation (see Appendix C, "Catocin households with and without Rt. 15 Stakeholder representation").
- Unrepresented were the historic village of Lucketts (with its two trailer parks housing modest-income and poor residents), farmers, Visit Loudoun, the Loudoun Economic Development Department, the county's preservation director, or county commissions of appointed citizens that support these dedicated county goals. Also unrepresented were organizations representing environmental interests in the fragile corridor

with ongoing water quality problems, business/property owners fronting Route 15, or a representative for owners of historic assets. A Facebook group was chosen to represent the business community.

- County staff did not oversee stakeholder outreach. The county gave no direction to stakeholders on how to present the complex information to constituents, and did not monitor the quality of outreach (or whether it took place at all).
- DTCI rejected the carefully collected citizen input from underrepresented constituencies collected at County request and submitted within the Aug. 1, 2018, deadline set, from the Catoctin Coalition and the Lucketts Ruritan Club, first stating that it was “overlooked” and then stating that the outreach was “conducted outside the public process for the Route 15 Safety and Operations Study” (see Chronology, July 2018 and October 2018 entries).

3. Citizen and organization requests for a broadening the vision and mission of the effort or adding expertise were rejected.

- In addition to declining to follow the CMP process, the County:
- declined a stakeholder request to involve the state Highway Safety Improvement Program office (and an offer by the HSIP to provide assistance to ensure greatest safety in the redesign).
 - declined to use the VDOT roundabout cost evaluation tool, safety comparison tools, or emissions calculation tools in evaluating signals versus roundabouts, to evaluate long-term cost savings.
 - rejected the recommendations of an independent traffic demand management professional on alternative approaches (the same engineer who designed the award-winning Route 50 project).⁵
 - rejected an independent professional engineering assessment on the viability of a single-lane roundabout at Whites Ferry,⁶ and the recommendations of a traffic demand management professional on alternative approaches (Ian Lockwood, Toole Design Group. “Learning from Loudoun’s Route 50 Traffic Calming Project, a National Model,” May 24, 2018, and Toole Design Group memorandum, “Route 15 Roundabout Conceptual Analysis, June 21, 2018”).
 - The County did not respond to letters in support of a traffic calming approach for the National Scenic Byway and concerns about its degradation from: the Loudoun Rural Economic Development Council, the Loudoun County Preservation and Conservation Coalition, Save Rural Loudoun, the Waterford Foundation, and the Piedmont Environmental Council. The Loudoun Heritage Commission asked to become involved in the project; its request was not granted.

COUNTY STAFF MISREPRESENTATIONS TO THE PUBLIC, ELECTED OFFICIALS, AND FUNDING ENTITIES

Loudoun’s substandard traffic modeling underestimates induced traffic and exaggerates future demand. failed to engage Maryland on a meaningful interstate transit-oriented approach to reducing the interstate traffic (80% of the volume), and refused professional engineering alternatives that would mitigate safety and congestion without damaging the byway’s attributes and economic viability. In addition to the misrepresentations in the preceding sections are the following examples.

1. The County stated to the public that the project was to address current congestion, but:

- It stated to funding bodies in 2018 that the project would both invite new interstate traffic (from I-495 and I-81), and reduce congestion for interstate traffic (over a 2-lane bridge and 2-lane section of highway north).
- It ignored an independent analysis of Loudoun’s flawed traffic model showing vastly underestimated rates of induced travel that the segmented 4-laning would cause (Norm Marshall, Smart Mobility, Inc. “Route 15 North of Leesburg: A Closer Look at the Effects of Widening,” September 2018. This was the third independent analysis of the traffic modeling used to promote new north-south corridor in Northern Virginia).
- Later (in 2019) it stated that the purpose of the widening was “to accommodate future development” (See Chronology, April and May 2019).
- The Phase 2 Safety and Operations Report showed that the almost-\$400M project when completed would just shift the congestion northward with even longer predicted queuing to the Potomac River Bridge.

2. The County misrepresented the costs and functionality of roundabouts.

- It stated that a roundabout at White’s Ferry Road was rejected in part because it would cost \$8M—but a similarly sized roundabout (also constructed within the existing right of way) in another part of the county had recently been completed at a cost of just \$1.9M.

- It failed to factor in long-term cost savings of roundabouts from accident reduction, decreased emissions, and reduced maintenance costs, as requested by several stakeholders.
- It stated that roundabouts with such disparate volumes would not work well at the White's Ferry intersection, but comparable roundabout volumes function well at Watson Road/Route 50 (in Loudoun) and Route 15/Route 464 (in Maryland just north of the bridge).
- It rejected the professional assessment (with modeling) of an experienced roundabout design firm that a single-lane roundabout would successfully handle volumes and access at White's Ferry.⁷ (VDOT in 2008, following higher than average accident rates, reduced the Gilbert's Corner roundabout from 2 lanes to 1 lane [recommended by the private engineering firm] based on the same erroneous assumptions the county has proffered for the White's Ferry intersection.)

3. The County claimed with no data that the project would reduce cut-through traffic around Lucketts and two other historic villages, Waterford and Taylorstown.

- No origin and destination studies were performed to verify the claim.
- The widening will spawn new trips throughout the corridor, admitted to (but underestimated by) Kimley Horn's analysis.
- Its plan for a western bypass around Lucketts village's residential center will serve through traffic instead of the commercial and community center of the village on the east side of the highway (antiques store complex, firehouse, community center, and elementary school).
- The western bypass is part of a private redevelopment plan for the village, which will be enabled by the new road—and will result in more new traffic.

4. The "increased safety" claims for the project are overstated.

- Outside of peak congestion, speeding is endemic on the highway. The design speed for the expressway will be higher. The sample sections and funding language indicate a freeway style design, using a "passive safety" design approach, which requires massive clearing of natural and manmade roadside features incompatible with a National Scenic Byway. An "environmental reference" design standard is more effective and appropriate. (See MacDonald, E. et al. 2008. *The Effects of Transportation Corridors' Roadside Design Features on User Behavior and Safety, and Their Contributions to Health, Environmental Quality, and Community Economic Vitality: A Literature Review*. University of California Transportation Center: Berkeley, CA.)
- The design achieves "safety" by sacrificing local access.
- There is no substance to the county's claim to the TPB that 4-laning 3.6 miles (or even 9 miles) of an 11-mile-long road ending at a 2-lane bridge will improve Homeland Security (Visualize 2045 Project Submission Form CEID 3608, p. 2).

5. The County has minimized or failed to mention environmental considerations, in addition to evading or minimizing environmental assessments.

- Funding applications do not mention the karst geology and groundwater threats. For example, the BUILD grant does not mention karst but describes extensive surface water mitigation plans ("groundwater recharge facilities, storm water management ponds with wetland forebays and storm water filters") that are highly problematic in karst areas.
- VDOT states vehicle emissions will be reduced, but new lanes and induced traffic will increase volumes and emissions, as will retention of signals.
- Noise pollution will increase.

6. The County failed to conduct any economic impact study of the effect that substituting an expressway for a National Scenic Byway will have on tourism, agriculture, or small business viability.

It failed to consult rural economic development staff or the REDC, Visit Loudoun, or local farm organizations regarding the project. Its sole outreach to local business was through a Lucketts area Facebook group, "Lucketts Business Collaborative," which has no board, leadership, or operating principles. The group representative's outreach to its group of members was spotty.

The Rural Economic Development Council, the Heritage Commission, the Waterford Foundation, Save Rural Loudoun, and the Loudoun County Preservation and Conservation Coalition all expressed concern about the proposed project. Their concerns were not addressed.

CONCLUSION

Loudoun County's failures in wise transportation planning, public process, and transparency for the Route 15 Project have not only set the county on a path that degrades its irreplaceable scenic and historic assets and the unique economic value they represent, they have degraded public respect in its government institutions and public officials.

It has declined the expertise and informed recommendations of both disinterested professionals engaged by organizations promoting preservation and smart growth policies, and citizens with professional expertise dedicated to preserving the county's unique assets for future generations.

It has failed to embrace data-based solutions that would advance regional goals for more sustainable and economical long-term transportation solutions laid out by the Metropolitan Washington Council of Governments. Under the guise of addressing congestion, it has embraced instead a plan that presages the next wave of western sprawl development.

The county has embarked on an expensive road-widening trajectory that continues a wasteful and repetitive cycle of successive and expensive widening projects that yield unsatisfactory results. "Route 15 will become a larger and more dangerous highway primarily designed for regional travelers, while the historic character of the corridor and its tourism economy is destroyed, local access is limited, and congestion remains."⁸

FINAL NOTE

The pendulum swings against and for new waves of sprawl and north-south corridors to facilitate them have for decades pitted citizen groups and preservation and environmental organizations against industry lobbying organizations and the advocacy firms they hire.

- A developer who opposed the Route 50 Traffic Calming Project paid a PR freelancer to mimic the project's webpage to spread misinformation, and to lobby to kill the project.
- During a bitter public fight in 2004-2007 when a developer-friendly BOS approved thousands of new houses in Loudoun, a website purporting to represent a "Smart Growth Institute" was launched to misinform and confuse citizens supporting smart growth policies for controlling runaway development. Costumed characters appeared at BOS meetings to portray the Piedmont Environmental Council as a corrupting influence in the public sphere.

The Route15 Project also featured a disinformation campaign, in this new age of electronic spying and cybercrime, against citizens calling for preservation and prudent transportation solutions.

- A lawyer was hired to make a FOIA request to Loudoun County for "all correspondence from Martha Polkey (Catoctin Coalition), Peter Gustafson (Lucketts Ruritants) and Gem Bingol (Piedmont Environmental Council) to any and all Board members and the responses from the board members to these individuals" for a 4-year period (June 2015 through June 2018).
- Emails of these three individuals were hacked, with some content related to the Route 15 process posted on or alluded to in the Selma Estates HOA's NextDoor social page.
- The Catoctin Coalition coordinator's computer was hacked, with keystroke-capturing and other spyware employed to harvest email lists, data and files.
- The Catoctin Coalition coordinator's Facebook pages and two MailChimp accounts (maintained for the Route 15 Lucketts area outreach and for the Loudoun County Preservation and Conservation Coalition, LCPCC) were hacked and email contacts collected.
- A group calling itself "FixRoute15Now" launched a website and newsletter as a disinformation campaign against those supporting traffic calming and context-sensitive design. The newsletter was sent to LCPCC and Catoctin Coalition MailChimp list contacts, as well as personal mail contacts on Polkey's computer who were members of neither group and had not emailed the county in the 4 years the FOIA request covered. The FixRoute15Now newsletter was shut down by MailChimp within a few days for violations of the federal SPAM Act. The website continues to function, and Selma and Raspberry Falls stakeholders continue to spread the disinformation it contains.

¹ Visualize 2045 Aspirational Element. <https://www.mwcog.org/visualize2045/aspirational-element/>. Accessed Aug. 17, 2020.

² Rural Roads Policies, No. 6. “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.”

³ Giffin, Geoff, Kimley Horn. May 10, 2017. “Route 15 Corridor Study, Town of Leesburg (North Limits) to the Maryland State Line.” Sent to Joe Kroboth, DTCL.

⁴ “Making Further Continuing Appropriations for the Fiscal Year 2003, and for Other Purposes: Conference Report to Accompany H.J. Res. 2.” 108th Congress, 1st Session. House of Representatives (108-10). *Congressional Record*, p. 1318.

⁵ Ian Lockwood, Toole Design Group. May 24, 2018. “Learning from Loudoun’s Route 50 Traffic Calming Project, a National Model.”

⁶ Toole Design Group memorandum. June 21, 2018. “Route 15 Roundabout Conceptual Analysis.” Toole Design Group: Silver Spring, Md.

⁷ Ken Ray, PLA; Ian Lockwood, PE. *Memorandum: U.S. Highway 15 Roundabout Conceptual Analysis*. Aug. 28, 2018. Toole Design Group: Silver Spring, Md.

⁸ Norman L. Marshall, Smart Mobility, Inc. Sept. 19, 2018. “Route 15 North of Leesburg: A Closer Look at the Effects of Widening.”