

Presentation to Loudoun County Board of Supervisors Business Meeting June 7, 2022

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Lucketts area rural residents

Good evening, chair and supervisors.

If it were necessary to sacrifice the scenic, historic, and environmental features along Loudoun's National Scenic Byway, Route 15, to save someone's life, we'd need to face that.

But it isn't.

Elected officials should not be swayed by emotional arguments that—no matter how sincerely felt—*are not borne out by an overwhelming abundance of evidence, accumulated locally, regionally, and nationally.*

This evening I and a few other Lucketts area rural residents will read a list of materials, represented here by this notebook—each document available to you upon request. They show that proceeding with this expensive, risky, and destructive project will not make the road safer or solve congestion. They show that a much cheaper project that can be built sooner will address those concerns without loss of homes, barns, businesses, farm viability, historic structures, beautiful viewsheds, and erasure of the last and most pristine segment of this historic road.

This corridor began as a Native American migration route, and along it are the structures and artifacts that tell the story of our entire history as a nation. In 2008, Congress appointed the Journey Through Hallowed Ground to protect it, because they believed it was worthy of preserving. So do we.

Expanding rural highways to open up farmland for development has been a priority of the Washington metro area development industry for decades. In 2017 a well-organized and well-funded campaign to promote Route 15 highway expansion began again, with the unfounded claim that more lanes are essential to increase safety, and that a high-speed expressway will accomplish safety goals.

A main theme of the campaign has been a sustained slander against the citizens who have worked for decades to increase safety on this rural highway, falsely claiming that they and conservation and preservation organizations have opposed safety improvements, and erroneously stating that preservation of the area's rural, historic, and scenic assets is incompatible with increased safety and function.

Tonight we'll list for you the history and documents that lay out the truth.

1. Here is a 1988 *Washington Post* article describing **an earlier attempt to put an outer beltway along Route 15**. It was rejected by Loudoun and Maryland jurisdictions, who did not want to invite sprawl into rural communities.

2. Here's a notebook of **federal and state resources that Lucketts rural residents put together in 2002 urging safety improvements** such as wider shoulders and roundabouts that would address safety and congestion without the highway expansion the development industry sought. They asked for a project based on the successful and low-cost Route 50 Traffic Calming Project, then underway.
3. Here is the **design concept citizens engaged Ian Lockwood—designer of the Route 50 and Route 9 projects—to produce to replace the wide, faster project that VDOT then preferred for Lucketts village.** Today the federal government hires Lockwood to *undo* highways that have destroyed communities and their economic vitality.
4. Here's the Congressional Record citation of the \$3 million in federal funds that former Congressman Frank Wolf obtained for Route 15 safety in 2003. A strong supporter of the Route 50 project, **Wolf endorsed using the federal funds for Route 15 traffic calming** that we sought.
5. Here's the **2004 VDOT internal memorandum stating that the broad paved shoulders and wide clear zones recommended in a 1998 VDOT study would invite higher speeds.** The design DTIC proposes is an even faster version of that design. County staff did not include that VDOT assessment in its list of Route 15 studies. SPEED KILLS.
6. Here's the **2007 VDOT validation study that the Virginia Deputy Secretary of Transportation ordered of proposed improvements to a stretch of north Route 15.** It shows that accidents increased after the broad paved shoulders and median were constructed up to White's Ferry Road. It also showed that at non-peak hours, vehicle speeds along this 45-mph road—without wide paved shoulders—were 50 to 60 mph. County staff omitted it from their 2018 list of Route 15 studies.
7. Here's **a map showing a 4-lane highway with a new bridge crossing along the Route 15 corridor that the development road lobby, Northern Virginia Transportation Alliance, got inserted in the 2007 County Transportation Plan in a secret meeting with county staff—which was thrown out when it saw the light of day.** The record shows that this attempted expansion is where, in 2017, County staff directed the consultant to begin its work. On May 11 the Alliance's executive director *himself* encouraged you to forward this highway expansion.
8. Here's a piece describing the **2011 attempt by Gov. McDonnell's secretary of transportation to ask the Commonwealth Transportation Board to violate its procedures and vote without prior notice on a river-to-river corridor with new bridge crossings—a plan that the developer-funded Northern Virginia Transportation Alliance lobbied heavily for. It included Route 15.** The CTB eventually voted to reject it.
9. The Alliance was invited to help rewrite Loudoun's Countywide Transportation Plan, and submitted this document as a Comp Plan stakeholder. **The lobbying group advises Loudoun County to expand rural highways in Western Loudoun, despite the overarching transportation needs in already developed eastern Loudoun.** The county has so far spent millions in Loudoun taxpayer dollars on those studies.
10. Here's the **presentation that Ian Lockwood made in May 2018 to the former Catoclin District Supervisor and county staff showing that the Route 50 Traffic Calming Project is a viable**

model for Route 15. Lockwood challenged the county to allow development of a traffic calming option and compare it *head-to-head* with any conventional widening option on safety, traffic, access, tourism, cost, and taxes. The Supervisor didn't allow Lockwood to make a public presentation before the Board of Supervisors, or even to the Transportation and Land Use committee. He declined to allow consideration of a cheaper traffic calming alternative. Without evidence, the Supervisor said that traffic calming "won't work" on Route 15—despite its working quite well elsewhere on Loudoun's rural highways used by commuters and trucks, with similar volumes.

11. Here's the June 2018 memorandum from a national engineering design firm that focuses on road design to enhance communities' livability—experts in roundabouts. **It shows that a single-lane roundabout at the Whites' Ferry intersection will handle traffic now and into the future, without widening. But the plan is to keep the signal.**
12. Here's the 2018 independent traffic modeling analysis submitted to the county, showing that that the county's future traffic demand model exaggerates the benefits of widening Route 15 and underestimates the new traffic problems it will cause. It states that this project "**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."
13. **Here's the county's own visuals from its own congestion study confirming that assessment.** It shows the new traffic problems and the new congestion that this project will generate.
14. **Here's the 2021 VDOT referral on the Route 15 North CPAM suggesting traffic calming measures be considered. It directly contradicts the assertion of county staff to the Planning Commission that VDOT did not allow traffic calming on roads like Route 15.**
15. At the April 20 TLUC meeting, county staff claimed that Route 15 is one of the top 10 most congested roads in the region. **But the September 2018 TPB congestion report that staff referenced shows that the congested area—located miles south of this project—ranked 15th in the region. That segment is the Route 15 bypass, where traffic stacks up because of traffic signals.** Interchanges are being planned for two intersections there, at about \$60 million a pop. But Raspberry Falls HOA residents successfully lobbied to keep the Whites Ferry signal instead of a much safer and more efficient roundabout, which most citizens preferred. A roundabout was built in the Dulles district a few years ago for a mere \$1.9 million.
16. **Here's the VDOT study showing that the most dangerous roads in Loudoun are 4-lane median-divided roads, precisely the design that this project will create on Route 15—except that those dangerous Loudoun roads don't need to accommodate 120 driveways, roads and entrances, farm equipment, livestock and horse trailers, and visitors to three roadside markets, restaurants and antiques shops, and historic churches.**
17. **Here's a 2007 county map of the sinkholes and karst features along Route 15 that county staff declined to allow to be brought into the first Route 15 public input session in 2017.** It shows some of the new sinkholes that occurred on this corridor with the construction of Raspberry Falls

and Selma Estates. Groundwater contamination following construction of those housing developments has cost millions to remediate.

18. **Here's the transcript of a DTTCI staff member stating in an online public input session there are NO karst features along Route 15.**
19. Here is a **state map of the Rust Cave Conservation Area that encompasses Route 15 north of White's Ferry Road.** There are several large caves documented in the area, as well as another opening at the edge of the shoulder.
20. Here's a report on some **U.S. road projects through limestone karst geology, and the various construction disasters that ensued.**
21. This is a short list of some of the many publications showing that **adding lanes to address congestion is a futile and expensive waste—which more forward-looking jurisdictions and the federal government are starting to address through engineering reforms.**
22. Here's a **description of road capacity. It is an engineering calculation of the ideal maximum number of vehicles that can be on a road that will allow traffic to flow at a certain speed at a certain point in time.** In fact, the number of vehicles that use Route 15 today DO use Route 15. The “over-capacity” argument for widening Route 15 is like the common and wasteful policy of requiring big box stores to have enough parking spaces for all the shoppers likely to show up on the days after Thanksgiving and Christmas.
23. Here are some **VDOT Average Annual Daily Trips counts, showing that, during and post-pandemic, commuter traffic on Route 15 is down 25%.** It's now 15,000 at the bridge and 20,000 at White's Ferry Road—not the 30,000 Supervisor Kershner asserted on May 11.
24. Here's the study commissioned by the Northern Virginia Transportation *Authority* showing that **these commuting changes are expected to be long-term changes.** What an opportunity to provide businesses with more incentives to further promote remote work and transit, to meet climate change goals.
25. Here's county comp plan language stating that the **county will encourage remote work.**
26. **Citing the NVTA study mentioned above, the Frederick County, Maryland, Climate Emergency Mobilization Workgroup prepared these recommendations for increased support for remote work** and bus rapid transit to reduce emissions.
27. Here are the results of a **Frederick County, Maryland, origin-destination study showing that the vast majority of its residents commute along the I-270 corridor, use MARC trains, metro or other transit. That's where its transportation dollars are going, now and into the future.**
28. Here is **Maryland's Highway Needs Inventory for Frederick County. The introduction makes clear it is a wish list, not planned projects. There is no new bridge on the wish list.** Route 15 north of the bridge is 15th of 17 on the list. Loudoun staff have erroneously cited it as evidence of Maryland “plans” for Route 15 highway expansion north of the Potomac bridge. **Frederick**

County's No. 1 priority is addressing congestion and safety on Route 15 north of Frederick City.

29. Here are county staff's notes from its 2018 meeting with Maryland staff, who stated they have no plans to build a new bridge, but instead offered to partner with Loudoun on transit options. Thank you, Supervisors, for announcing a new intercounty transit initiative. How many commuter buses could the county fund for \$300 million?
30. Here is the DC Metro Council of Government's Visualize 2045 aspirational regional goals for improving transportation in the region cost-effectively. It encourages transit, trail and remote work solutions-- not fatter highways in rural areas.
31. Here is the County's VDOT Smart Scale funding application for this project that the state rejected. In that funding cycle a shift was noted in prioritizing projects that addressed transportation needs by other means than building more lanes for single-occupancy vehicles.
32. Here is the \$14 million substitute project that VDOT offered instead, to address safety and congestion in Lucketts, which the County so far has rejected. Will Smart Scale be eager to fund a vastly expensive road project that ends in 4-miles of congestion up to a 2-lane bridge into Frederick County?
33. Here is the County's federal BUILD grant application for this project that the feds rejected. In it the county asserts it believes it can avoid National Environmental Protection Act requirements for federal highways.
34. Here is the documentation showing that the county removed federal funds from the expansion project up to Montresor Road, which Supervisor Kershner has noted was done to avoid "burdensome federal requirements." These rules are intended to protect environmental safety and our nation's precious assets, by mitigating through alternative solutions the damage that massive road projects can cause—and that this project will.
35. Here is correspondence between County staff and a coalition including Journey Through Hallowed Ground, in which the county admitted it cannot evade federal reviews for the highway expansion to Montresor despite federal funding being removed. In its letter staff promised to initiate the required reviews when Phase 1 design plans are at 60%. Plans for the segment from the bypass to Whites Ferry Road are now at 90%. JTHG has received no response to its recent request about when reviews will begin.
36. Here are maps showing the destruction to homes, barns, wells, streams, springs, and businesses that the new road footprint will have, based on Phase 1 engineering drawings that show a road five times as wide as today's.
37. County staff have said that they don't want to make immediate improvements within the current 50-60-foot right of way, because it will add to the so-far estimated \$300 million cost of this unfunded project. Here is the Virginia Highway Improvement Office's Crash Cost Calculation tool, which puts a price on human life, injuries, and other costs from crashes. *Please ask the VDOT Office to conduct the cost-benefit study of costs for making immediate improvements within the*

existing right of way and adding roundabouts, versus the human costs of doing nothing for 10 to 20 years.

We will gladly forward any of these documents to you. Many have already been shared, and we're happy to send them again.

This is a *profoundly* important, precedent-setting decision for the future of the entire county from east to west.

- It concerns public safety not only on roads but of our drinking water.
- It will profoundly affect agricultural viability and business profitability.
- It comes with significant environmental risks in this limestone karst region.
- It will affect tourism and it will affect development patterns.
- It will affect future funding for all the infrastructure needs in Eastern Loudoun.
- It will impact the region's climate change goals.

Good government demands making the hard but right decisions, not the easy and wrong ones.

If you make the right decision—to prioritize constructing immediate safety improvements and traffic calming, and aggressively promote transit and remote work instead of a phenomenally expensive and destructive road project—you have a solid basis to show citizens that it is the right one.

Drivers will be safer sooner, excessive costs and destruction will be avoided, farms and businesses will continue to be profitable.

If this project—Loudoun's first ever county-run road project—proceeds, Loudoun will enter the national spotlight for supremely bad transportation planning, that runs contrary to the trends now seen in more forward-looking jurisdictions nationally—and right next door in Maryland.

Here is the list, to be entered into the public record.

Thank you.

REFERENCES

Presentation to Loudoun County Board of Supervisors Business Meeting, June 7, 2022

1. "New Bypasses Topic of Forum in Leesburg." 1988, *Washington Post*.
2. Citizens for a Safer Route 15. 2002. Collection of federal, state, and local resources and statistics on the increased safety to be gained from improvements including shoulders, rumble strips, guardrails, enforcement, and retention of natural features "to remind motorists that this is a local rural road, not a high-speed four-lane expressway."
3. Ian Lockwood. 2003. Lucketts village traffic calming concept. Citizens could not afford to pay then (even at a generally discounted rate) for a concept for the entire corridor.
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. "Resolution of Field Inspection Recommendations, Project 0015-953-125, PE 102, Route 15 from White's Ferry Road to 0.25 Mile North of Lucketts Road." February 24, 2004, VDOT Interoffice Memorandum, page 10.
6. Senil Taori, VDOT. March 14, 2006. "Route 15 Corridor Safety Study: Summary of Crash History and Traffic Data."
7. 2007 Countywide Transportation Plan Draft. May 25, 2007. Figure 2-4c: 2030 Level of Service Revised CTP Network Northwest (PDF page 36), Figures 3-1c, Revised Countywide Transportation Plan Leesburg Area (PDF p. 64), and Figure 1-3f, Revised Countywide Transportation Plan Northwest Loudoun (PDF p. 65). See also 2007 graphic: "Alternative 3 Improvements" which includes a bridge across the Potomac north of St. Clair Lane.
8. Stewart Schwartz. August 5, 2011. "The Zombie Outer Beltway Returns," Greater Greater Washington blog. Accessed at <https://ggwash.org/view/10281/the-zombie-outer-beltway-returns>. Martin Di Caro. May 14, 2013. WAMU: "Virginia Pushes For 'Outer Beltway' That Critics Say Isn't Needed." (link provided in document)
9. Northern Virginia Transportation Alliance. November 7, 2018. "Draft 2040 Countywide Transportation Plan, Envision Loudoun -Public Input Comments."
10. Ian Lockwood. June 2018. Presentation made to Supervisor Geary Higgins, aides, and Loudoun staff and consultants. Also see Ian Lockwood, Toole Design Group. May 24, 2018. "Learning from Loudoun's Route 50 Traffic Calming Project, a National Model." (*The county had made the decision to 4-lane to Montresor before the first public input session in June 2017, and already had submitted funding applications for expansion to Lucketts May 2018, and so rejected Lockwood's plan.*)
11. Ken Ray, PLA; Ian Lockwood, PE. "Memorandum: U.S. Highway 15 Roundabout Conceptual Analysis." June 21, 2018. Toole Design Group: Silver Spring, Md.
12. Norman L. Marshall, Smart Mobility, Inc. Sept. 19, 2018. "Route 15 North of Leesburg: A Closer Look at the Effects of Widening."
13. "Following completion of \$400+ million Route 15 widening projects, congestion just moves north." Graphic prepared from 2019 Route 15 Congestion and Safety Operations Study by Kimley Horn, pp. 32 and 61.
14. Yao Lu, PE, VDOT. September 23, 2021. Ref-1 VDOT. Correspondence sent to Alaina Ray. "Subject: CPAM-2021-0002, US Route 15 North – Widening and Safety Improvements," p. 2.
15. National Capital Region Transportation Planning Board, Metropolitan Washington Council of Governments. September 7, 2018. "2018 Congestion Management Prices (CMP) Technical Report." Table E-2:2017 Top Bottlenecks - Peak Periods., p. 18.
16. Office of Intermodal Planning and Investment. January 3, 2022. "Loudoun County 2016-2020 Potential for Safety Improvement (PSI) for Fatal and Injury Crashes, with US Route 15 Focus Segment Comparison."
17. Loudoun County Department of Building and Development. February 6, 2007. "Loudoun County Carbonate Area with Mapped Sinkholes - Route 15 Corridor. Map Number 2007-015.
18. Jim Zeller, DTICI. Comment from October 29, 2020, Loudoun virtual public hearing on improvements from Leesburg to Montresor Road. (link to meeting recording not listed on relevant web page (<https://www.loudoun.gov/5448/Route-15-North-Widening-Public-Info>)); requested 6/10/22).

19. Virginia Department of Conservation Karst Protection Office. "Map: Rust Conservation Site."
20. Harry Moore, Golder Associates. "Karst Geohazards along Highways in East Tennessee: Identification and Mitigation." Presentation at 11th Annual Appalachians Geohazards Conference, August 2-4, 2011.
21. List of articles on induced traffic and designing safer roads. Available upon request.
22. Highway Capacity: Definition, Importance, Factors and Formula. Accessed at <https://www.engineeringenotes.com/transportation-engineering/traffic-engineering/highway-capacity-definition-importance-factors-and-formula/48457>. See also Chuck Marohn. 2021. *Confessions of a Recovering Engineer: Transportation for a Strong Town*. Wiley: New York.
23. VDOT Annual Average Daily Trips, Route 15, 2017, 2019, 2020.
24. NVTA's TransAction: Transportation Action Plan for Northern Virginia. COVID-19: Transportation Impacts and Opportunities. Presented at NVTA Meeting, July 9, 2020. Accessed at https://thenovaauthority.org/wp-content/uploads/2020/07/5.NVTA_R2S-Scenario-Planning_Draft-Presentation_7-8-20_v3.pdf.
25. Comp Plan excerpts on telecommuting and transit, pp. 7-1, 7-1.3.
26. Frederick County, Maryland, Climate Emergency Mobilization Workgroup Report. Volume 1. Recommendations on remote work and transit, pp. 76-81. Accessed at: <https://www.frederickcountymd.gov/8113/Climate-Change-Workgroup-Information>.
27. Email correspondence with Frederick County planner, Kimberly Golden Brandt, Livable Frederick Director, kgbrandt@frederickcountymd.gov. "Home Destination Report - Where Workers Live Who are Employed in the Selection Area - by States."
28. Maryland Department of Transportation. 2020. Highway Needs Inventory, Frederick County.
29. DTCL. February 2, 2018. Meeting Summary, Partner Agency Meeting, Discussion of Route 15 with Maryland and Virginia Agencies.
30. National Capital Region Transportation Planning Board. 2018. "Visualize 2045. Seven Transportation Initiatives for a Better Future." https://www.mwcog.org/assets/1/6/2018_Aspirational_Initiatives_Brochure.pdf
31. VDOT Smart Scale Portal. 2018. Route 15 Whites Ferry Road to Points of Rock Bridge. Project 3593.
32. OIPI US-15 & Lucketts Road QRI Updated Information Package-c (quadrant intersection plan, with opportunity to improve school access safety).
33. DTCL. U.S. Route 15 (Whites Ferry Road to the Maryland State Line). Application for BUILD 2018 Planning Grant.
34. Martha Polkey. February 2, 2021. Documentation on Removal of Route 15 Phase 1 Federal Funding.
35. Emails and letters between County staff and VDOT, and correspondence with JTHG Coalition.
36. Maps prepared by PEC with notations of structures and water resources that will be impacted.
37. Virginia Highway Safety Improvement Office. [VDOT Traffic Crash Costs memo](#). Also see VDOT Crash Data Analysis Manual. Accessed at https://www.virginiadot.org/business/VDOT_Crash_Data_Manual_Nov2017.pdf. See also https://vdot.virginia.gov/business/ted_app_pro.asp. Contact Stephen Read, Stephen.read@virginia.vdot.gov, for more information on arranging a cost-benefit study.

ADDITIONAL RESOURCES - FUNDING

38. If this were a VDOT project, it would require a financial plan, by law. VDOT Financial Plan requirements, accessed at https://www.virginiadot.org/projects/financial_plans.asp
39. Proffers noted as a potential funding source. County Staff report for the Planning Commission March 11, 2022, Work Session. [CPAM-2021-0002, US Route 15 North – Widening and Safety Improvements](#), page 11.
40. Map. A western Lucketts bypass will bisect or be adjacent to 440 acres of prime farmland on the west side of Lucketts village (as well as the 50-unit mobile home park now up for sale). Proffers could be obtained in exchange for rezoning for intensive housing development (creating more traffic).