

ROUTE 15 NORTH JTHG COALITION

BYWAY MANAGEMENT PLAN RECOMMENDATIONS

Route 15 Phase 1 (Leesburg to White's Ferry Road and White's Ferry Road to Montresor)

**Journey Through Hallowed Ground Partnership
Coalition for Smarter Growth
Piedmont Environmental Council
Southern Environmental Law Center
National Trust for Historic Preservation**

Herein we present our strong suggestions for more closely aligning this road widening project with the goals laid out in the Management Plan for the Journey Through Hallowed Ground (JTHG) National Scenic Byway, authorized by Congress in 2008 and endorsed by the Loudoun County Board of Supervisors in 2008. From the beginning of this process, we have provided input to ensure that any design changes both improve safety and adhere to the JTHG Byway Management Plan. The Route 15 North JTHG Coalition has continued deep concerns that the current proposed design will encourage higher speeds, reduce safety, and diminish the natural, historic, rural and scenic character of the Route 15 National Scenic Byway, which is the primary artery of the region's \$750 million heritage tourism industry.

CONTEXT-SENSITIVE DESIGN ELEMENTS

Context-sensitive design on a National Scenic Byway helps further the goals of safety and operations along the corridor. The "context" in this case is a corridor, along which scenic and historic assets are to be protected and preserved for future generations, and to promote compatible economic development. The JTHG Byway Management Plan lays out five parts of this approach:

- Enhancing the visitor experience
- Preserving and maintaining the byway's intrinsic qualities
- Interpretation, heritage tourism and visitor management
- Roadway safety, wayfinding and enhancement
- Stewardship.

As the Federal Highway Administration states:

Context-sensitive design asks questions first about the need and purpose of the transportation project, and then equally addresses safety, mobility, and the preservation of scenic, aesthetic, historic, environmental, and other community values. Context sensitive design involves a collaborative, interdisciplinary approach in which citizens are part of the design team.¹

Safety is a pre-eminent concern along a National Scenic Byway. Visitors must feel that their journey is comfortable and that access to points of interest is secure. Business owners want to ensure that those visitors can easily enter and depart without risk of accident and injury. Along this corridor, increased safety is strongly desired by residents and commuters as well. Adoption of our below recommendations will achieve these shared goals.

- **Incorporate flexible design standards** enshrined in the Federal Highway Administration’s Flexibility in Highway Design. Examples can be found in *National Scenic Byways Program. Lessons from the Road: Case # 2: Design & Maintenance for Byways.*²

- Engage VDOT’s Highway Safety Improvement Program Office, to **ensure that the design furthers the state’s Vision Zero program goals to reduce highway deaths.**

- **Replace the proposed signal with a roundabout** at White’s Ferry Road. It would be safer, would function more efficiently than a signal, would have lower maintenance costs, and would reduce the risk for pedestrians and cyclists negotiating the intersection. A roundabout would also reduce the footprint of the project north and south of the intersection (because turn lanes are not needed), where historic assets and significant environmental concerns exist. It also would allow both north- and south-bound traffic seeking to enter the roadway between White’s Ferry and Montesor roads to turn right and use a roundabout to reverse direction, eliminating the need for dangerous left-hand turns across three lanes of oncoming traffic. This also would eliminate the need for a wide median in this section, where there are historic assets to the east and floodplains to the west.



Workers install geoblocks for construction of a stabilized grass pulloff on Foothills Parkway in Great Smoky Mountains National Park, TN.

- **Construct shoulders** that are 2 feet of pavement (with mumble strips) and 8 feet of grassed geogrid. This treatment is currently used on National Scenic Byways, and prior VDOT improvements on this portion of the corridor (in 2007) incorporated grassed shoulders for the purpose of retaining byway characteristics, at the direction of the then-Deputy Secretary of Transportation. We can provide research³ and examples that demonstrate how it modifies illegal and reckless driver maneuvers, and reassure the Sheriff’s Office and fire and rescue staff that this treatment accommodates heavy vehicles and the safety of its staff.

- **Use timber on steel guardrails and/or curb-and-gutter** in the area of Big and Little Spring, with a constrained median width, to reduce impacts to both the historically significant Big Spring and the brown trout population in Little Spring and downstream.

- **Use timber on steel guardrails and/or curb-and-gutter** instead of wide clear zones should be used where mature trees are within the right of way or work zone, to preserve the existing landscape. This strategy was used in prior VDOT improvements on this portion of the corridor (2007). These are widely used on scenic byways nationwide (see image of this guardrail style on U.S. Route 15 in Connecticut, the Merritt Parkway, at right, which sees 72,000 vehicle trips per day). Both treatments are especially appropriate for the flowering arbor in front of Rockland.



- **Retain unpaved road for the new alignment of Limestone School Road.** The new eastbound section of this road from the roundabout to the original alignment of the road should be unpaved



soon after it departs from the intersection. This is part of Loudoun's Historic Rural Roads Network, recognized this year as endangered by Preservation Virginia. The road network is now eligible to be placed on the National Register. The America's Routes initiative is actively working to further protect and enhance the roads, which are used by horseback riders, horse-drawn carriages, cyclists, runners, and walkers. See the America's Routes

website.⁴

Another issue with this alignment is its failure to address the safety and emergency access issues. Limestone School Road is the access road for NOVA Parks' Temple Hall Farm Park, which draws thousands of visitors to its annual corn maze event in the autumn. Traffic backs up on the narrow road section from the current intersection with Route 15, across the historic one-lane bridge (above) and to the park entrance, around a sharp curve.



Property owners along that section of the road would prefer an alignment through the (former) Whitmore property and NOVA Parks property. This straightened road alignment (which should follow VDOT's unpaved Rural Roads policies) would bypass the historic bridge, reduce safety concerns, and allow for preservation of that portion of the historic unpaved road—which has many limestone outcrops close to the road.

- **Engage tourism, economic development, and agricultural stakeholders.** To ensure that the road's redesign has the least amount of negative impact to its scenic, historic, and economic assets, we request that the following organizations, which were not included in the past two years of this project development, be allowed to engage meaningfully and comment upon the design:
 - Heidi Siebentritt, Loudoun County Preservation Planner
 - Loudoun County Heritage Commission (which requested earlier to be involved) Bob Pollard, pollardra@hotmail.com
 - Loudoun Rural Economic Development Council (which earlier expressed concerns about the project) Kelly Foltman, dunthorpe@roadstarinternet.com
 - Visit Loudoun, Beth Erickson, erickson@visitloudoun.org
 - Virginia Department of Historic Resources, julie.langan@dhr.virginia.gov
 - America's Routes, Mitch Diamond, mdiamond9@earthlink.net; Jane Covington, jane@janecovington.com
 - Loudoun Farm Bureau, John Adams, adams@rockcroftfarm.com.

ENVIRONMENTAL CONCERNS

This project is within Loudoun's Limestone Overlay District. It is in an area where there have been repeated groundwater contamination events (Raspberry Falls and Selma housing tracts; other private wells have been contaminated). Construction at the developments and at Leesburg Crossing (at the corner of Montesor Road and Route 15) resulted in new sinkholes opening, and the identification of new voids.⁵ A sinkhole on Business Route 15 in north Leesburg (near the schools) has repeatedly

opened in the recent past. (New sinkholes opened up during construction of a county courthouse complex in June 2017, costing an additional \$5 million to remediate and 5 months of project delay.)

The Virginia Transportation Research Council has noted issues with road reconstruction in limestone karst areas.⁶ Parts of the project are within the Rust Cave Conservation Area (Rockland property). There is a cave opening next to the roadside on the Rockland property. Sediment that is clearly the product of highway runoff can be seen there.⁷ County maps also show the location of two sinkholes close to the road on the west side of Route 15 along this corridor (one north of Raspberry Falls Drive, one north of Montresor within the project limits).

As a result, this project requires intensive geotechnical studies (including dye tracing) to ensure both against further water contamination and to prevent new sinkholes and collapses in the area. Water retention and runoff accumulation facilities are likely to exacerbate water quality concerns.

Please consult the below authorities and offices to coordinate on this project.

- The Virginia Department of Conservation and Recreation's Karst Protection Coordinator, Wil Orndorff, Karst Protection Coordinator, 540-230-5960, wil.orndorff@dcr.virginia.gov.
- Northern Virginia Chapter, Trout Unlimited, Jay Lovering, jayloving@gmail.com)
- Loudoun Soil and Water Conservation staff, Jay Frankenfield, jay.frankenfield@lswcd.org
- John Odenkirk, regional fisheries biologist, Department of Game and Inland Fisheries, john.odenkirk@dgif.virginia.gov

Wetlands impacts

This project will inevitably require a permit from the Army Corps of Engineers, because of jurisdictional waters and wetlands within the right-of-way and the proposed construction area. Yet the county has not yet initiated the permit application process with the Army Corps, which creates the risk of additional cost and delay. Prior to authorizing any permit, the Army Corps will be required to comply with Section 106 of the National Historic Preservation Act, which calls for the consideration of alternatives and modifications to the project that would avoid or reduce its adverse effects on historic properties, such as Rockland. The county's postponement of the Army Corps permit may foreclose alternatives, which would delay the approval process, but it also misses the opportunity for a more integrated and efficient planning process. We urge the county to initiate the application process with the Army Corps as soon as possible.

Landscaping

The over-arching goals of the Byway Management Plan are for a naturalistic effect, using Virginia native trees, shrubs, and wildflowers appropriate to the soils and terrain. As noted earlier JTHG has funding available for tree plantings and will commit a portion of that funding to plantings along the corridor, as part of its Living Legacy Program to honor Civil War dead.

We strongly recommend that the county incorporate the goal of moving utility wires underground in planning for the project. And we believe that funding will soon be available to assist in supporting this kind of effort. For example, in July 2020 the U.S. House of Representatives passed the Moving Forward Act, which will help fund our transportation priorities as a nation for the next 5 years. The legislation, expected to pass the Senate would grant access to \$25 billion per year for undergrounding of utility wires, through the National Highway Performance Program. JTHG

wishes to work with the county to pursue funding sources such as this to underground utility wires along Route 15.

Other landscaping guidelines in the Byway Management Plan:

- Landscaping approach should be not to over-plan or over-plant. Consult other scenic byways for compatible designs.
- Use landscaping to modify driver behavior (trees in the median; retain trees close to the road; use guardrails where mature trees otherwise would be removed).
- Don't block the viewshed—with exceptions being adding/retaining trees to shield the Raspberry Falls and Leesburg Crossing houses from the road (and as a natural noise barrier).
- Adopt a tree-save approach, to retain mature trees, inventory where trees are removed, and establish a 2 to 1 replacement plan.
- Any required storm-water retention facilities should be natural looking, should take into consideration the karst geology, and should not be sprayed or mowed by VDOT.
- The draft plan includes the use and reference to crimson clover as a plant suggestion. Please replace it with a native(s) It has been noted as invasive in nearby West Virginia. Please consult the Piedmont Chapter of the Virginia Native Plant Society for guidance.

Loudoun Wildlife Conservancy (Michael Myers, Executive Director, mmyers@loudounwildlife.org) has coordinated with VDOT in the past to plant pollinator strips along rights of way in Northern Virginia. The Piedmont Chapter of the Virginia Native Plant Society is another source of guidance (Emily Southgate, ewbsouthgate@gmail.com).

CONCLUSION

Implementing the above concrete actions will more closely align this road widening project with the goals laid out in the Management Plan for the Journey Through Hallowed Ground (JTHG) National Scenic Byway. We continue to work to ensure that this project will improve safety, access, flow, and adhere to the JTHG Byway Management Plan, to ensure protection of its assets into the future. We look forward to a continued partnership with the county, Loudoun citizens, and other local, regional, state and national organizations to achieve these aims.

¹ Federal Highway Administration. *Context Sensitive Design / Context Sensitive Solutions (CSD/CSS)*. FHA: Washington, D.C. FHWA Publication No: FHWA-RC-BAL-04-0015

² U.S. Department of the Interior, National Park Service. 1998. *National Scenic Byways Program. Lessons from the Road: Case # 2: Design & Maintenance for Byways*. U.S. Department of Transportation, Federal Highway Administration: Washington, D.C. FHWA-EP-99-011.

³ 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. See "passive safety" vs. "environmental reference," p. 15.

⁴ <https://americasroutes.com/about-the-roads/>.

⁵ Loudoun County Carbonate Area with Mapped Sinkholes.

<https://www.loudoun.gov/DocumentCenter/View/4770/Karst-Map?bidId=>

⁶ Virginia Transportation Research Council: "Final Report Highway Runoff in Areas of Karst Topography."

http://www.virginiadot.org/vtrc/main/online_reports/pdf/04-r13.pdf.

⁷ Citizens recorded the visit by a geologist who entered the cave opening, described his findings, and made a report to the state Karst Protection Office. (Contact Peter Gustafson, petergustafson@me.com, for the video.)