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## Fwd: Submission from JTHG Coalition on Route 15 Phase 1

1 message

**Bill Sellers** <bill@jthg.org>  
To: Michelle Kellogg Burrelli <michelle@jthg.org>

Tue, Dec 1, 2020 at 3:59 PM

----- Forwarded message -----

From: **Katherine Wilkins** <katherine@jthg.org>

Date: Mon, Nov 30, 2020 at 8:39 PM

Subject: Submission from JTHG Coalition on Route 15 Phase 1

To: <dtci@loudoun.gov>, Hoffman, Mark <Mark.Hoffman@loudoun.gov>, Randall, Phyllis <Phyllis.Randall@loudoun.gov>, <caleb.kershner@loudoun.gov>, <Koran.Saines@loudoun.gov>, <Juli.Briskman@loudoun.gov>, <Mike.Turner@loudoun.gov>, Buffington, Tony <Tony.Buffington@loudoun.gov>, <Sylvia.Glass@loudoun.gov>, <Matt.Letourneau@loudoun.gov>, Umstattd, Kristen <Kristen.Umstattd@loudoun.gov>  
Cc: Betsy Merritt <emerritt@savingplaces.org>, Gem Bingol <gbingol@pecva.org>, Stewart Schwartz <stewart@smartergrowth.net>, Morgan Butler <mbutler@selcva.org>, Bill Sellers <bill@jthg.org>, Martha Polkey <martha@jthg.org>

Re: Route 15 North Widening: Battlefield Parkway to Montresor Road

Dear Mark,

This letter is submitted following the virtual public meeting held by the County on October 29, 2020, to solicit public input regarding the proposed Route 15 North Widening project. In response to the county's request for public comments by November 30, we are summarizing 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 later that year.

We appreciated the opportunity to talk through our suggested ways to enhance the National Scenic Byway during our November 17 virtual meeting with you, Mark, as well as Jim Bishoff and Lorainne Barksdale of J2 Engineers. 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. As we discussed, we have continued deep concerns that the current proposed design will exacerbate speeding, reduce safety, and diminish the natural, 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. Some of those concerns include:

- Since JTHG CEO and President Bill Sellers first met with DTCI staff at its request to discuss the Route 15 improvement progress in December 2016, we have repeatedly encouraged DTCI to follow the guidelines and protocols laid out in the JTHG Byway Management Plan. To date there has been no meaningful coordination or adherence to the spirit or substance of the plan. In fact, the county staff has rejected every attempt on our part to align this project with the tourism and local economic prosperity that a National Scenic Byway brings to a region—as it works to reduce congestion and increase safety along the corridor.
- The scope of work the county accepted from the Route 15 study consultant did not even mention the National Scenic Byway or the need to assess resources (the first step when a byway needs road improvements), and the county directed the Route 15 study consultant to assume and plan for capacity increases prior to any future demand analysis.
- Despite its commitment to the BOS to use context-sensitive design principles for this project,<sup>[1]</sup> the county has not followed the basic precepts of this approach, as described by the Federal Highway Administration: “Communication with all stakeholders is open, honest, early, and continuous; the purposes of the project are clearly defined, and consensus on the scope is forged before proceeding; the highway development process is tailored to meet the circumstances; the landscape, the community, and valued resources are understood before engineering design is started.

- The county’s removal of federal funds from the project eliminated the requirement to follow federal laws such as Section 4(f) of the Department of Transportation Act, to evaluate impacts on natural and historic resources along the corridor, and minimized requirements mandated by Section 106 of the National Historic Preservation Act.
- The county has not yet initiated the application process for Army Corps of Engineers' authorization, which will be needed due to the project's impacts on jurisdictional waters and wetlands, and this delay creates a risk of increased costs and inefficiencies.
- The county has failed to meaningfully engage with its own Rural Economic Development Council, its own preservation planner, or Visit Loudoun. (An independent economic impact study of the JTHG National Heritage Area shows that heritage tourism brings about \$750 million annually to the region.)
- The county has declined to avail itself of the expertise of the state’s Highway Safety Improvement Program to align improvements with the state’s “Arriving Alive in Virginia – Moving Virginia Toward Zero Deaths” initiative. Safety for tourists is essential on a byway.
- The county has declined to use VDOT’s Intersection Cost Comparison Spreadsheet Tool on Roundabout Guidance , which would have included future cost savings from lower maintenance costs and fewer accidents and injuries.
- The county has ignored the technical analysis of a nationally prominent independent engineering firm (led by the designer of the award-winning Route 50 traffic calming project, and paid for by JTHG) showing that a roundabout at White’s Ferry would function better than a signal and would not require adding capacity.
- The county has ignored an independent analysis from a national traffic modeling firm showing the flaws in the county’s traffic model and showing the large increase in induced traffic that the widening would create.

Again, we appreciate the fact that we are continuing our discussions about the best alternatives to improve safety for travelers, enhance access for local residents and business, and ensure better traffic flow while maintaining the rural, scenic and natural beauty of the National Scenic Byway. The attached document includes our strong suggestions to ensure that this project both increases safety and aligns with the Loudoun County Board of Supervisors’ stated support for the economic and tourism goals that this National Scenic Byway brings to Loudoun.

We look forward to a follow-up conversation in mid-December.

Sincerely,  
William W. Sellers  
Journey Through Hallowed Ground

Stewart Schwartz  
Coalition for Smarter Growth

Elizabeth Merritt  
National Trust for Historic Preservation

Morgan Butler  
Southern Environmental Law Center

Gem Bingol  
Piedmont Environmental Council

Martha Polkey  
Catocin Coalition

[i] Item 07 Rt 15 Congestion Report Scope of Improvements, Sept. 18, 2018: 5. "Staff recommends that the Route 15 improvements be designed to incorporate context sensitive design methodology and follow the Journey Through Hallowed Ground’s design guidelines where feasible."

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**William W. Sellers**  
**President and CEO**

**Journey Through Hallowed Ground National Heritage Area**

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HallowedGround.Org

The Journey Through Hallowed Ground Partnership is a non-profit, four-state partnership dedicated to raising awareness of the unparalleled American heritage in a region running from Gettysburg, PA through Maryland and Harpers Ferry, WV to Jefferson's Monticello in Albemarle County, VA. With more history than any other region in the nation, JTHG is recognized by Congress as a National Heritage Area and offers authentic heritage tourism programs and award-winning educational programs for students of all ages. Take the Journey to *Where America Happened*.



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