

To: TPB Public Comment
From: Stewart Schwartz, Executive Director
Bill Pugh, Senior Policy Fellow
Date: May 3, 2021
Re.: Comments on Visualize 2045 Draft Conformity Inputs

TPB Members: the choice to create a better plan and support a livable climate is yours

TPB board members can choose to create a long-range transportation plan that achieves our region’s adopted climate targets, serves the region’s adopted housing goals, improves the accessibility of jobs and other basic needs, and promotes safer, more sustainable and more affordable travel modes.

Or, TPB board members can choose to adopt a business-as-usual list of projects, model them with outdated travel patterns, fail to help achieve regional climate targets, and make no commitments to travel demand management and land use, found by TPB itself to be the most effective regional transportation solutions.

It is entirely within the power of TPB board members and TPB staff leadership to create a better plan now rather than wait until the next four-year update of Visualize 2045. The world has little time left to rapidly reduce greenhouse gas emissions and prevent global catastrophe.

Transportation is the largest source of emissions in the region, depending on electric vehicles is not enough, and it would be totally unacceptable for the region’s planning agencies to adopt a climate action plan and then turn around and draft a transportation plan inconsistent with the climate plan.

It is because of the urgency of the moment and the shortcomings of the current draft plan, that our comments must be particularly pointed at this juncture.

The Coalition for Smarter Growth submits the following comments on the Visualize 2045 draft conformity inputs:

1. **It is unacceptable for TPB to draft a transportation plan that does not commit to the regional climate plan’s transportation strategies and emission targets.** The region cannot wait another four years to create a transportation plan that includes strategies to achieve emission targets and that commits to them, given the urgency of the climate crisis. The National Capital Region of the United States has the technical capabilities, talented personnel, and stature to tackle pressing challenges – if this region cannot take decisive action on climate change, then it leaves little hope for much of the rest of the world.

2. **TPB's own climate studies to date and the experience of peer metropolitan areas provide sufficient guidance to create a better Visualize 2045** that achieves necessary reductions in vehicle miles traveled and emissions while improving access to jobs and services and enhancing equity, safety and health.
 - a. TPB's [2018 LRPTF](#) for example, demonstrates ways to address regional travel priorities and reduce driving and emissions, without pursuing a laundry list of destructive highway expansion projects.
 - b. WMATA's [ConnectGreaterWashington study](#) also demonstrates that land use and travel policies combined with a few strategic transit investments and improved station access can significantly reduce VMT and emissions, while improving travel and accessibility across the region.
 - c. See CSG's Report: [Cutting Transportation Emissions by 2030 and Beyond: Smart Land Use and Travel are Essential](#) for examples of other local and national strategies and our recommendations for the region.

3. **The projects and other conformity inputs must be revised so that they are consistent with TPB's own directives, voted 22-0 by the board (with several abstentions) on December 16, 2020.** The current mix of proposed conformity inputs does not meet the TPB's criteria in the Technical Inputs Solicitation that:
 - a. "...the TPB requires its member agencies to prioritize investments on projects, programs, and policies to reduce greenhouse gas emissions, prioritize the aspirational strategies, and achieve COG's land use and equity goals..." and
 - b. Meeting greenhouse gas emissions targets "...will require a reduction in vehicle miles traveled and associated emissions in Visualize 2045."

4. **TPB and many project sponsors did not provide sufficient information for the current public comment period on the regional policy consistency of most proposed projects.**
 - a. The public comment materials excluded the vast majority of projects (all of those in the previous plan without significant changes) with regard to how they would address important regional policy priorities. These include policy goals like promoting non-SOV travel, reducing VMT, contributing to reductions in greenhouse gas emissions, and serving equity-emphasis areas. For example, of the approximately 100 major projects in Visualize 2045, the public comment materials provided regional policy consistency information for only 4 major projects. TPB staff set a deadline of April 30 for project sponsors to submit this information, at the very end of the public comment period. While the public may not be as interested in receiving this information for the many maintenance or ongoing operations projects included in the conformity inputs, the several hundred highway/road expansion and transit/rail expansion projects carried over the previous plan are certainly of interest in regards to how they support regional and federal policies.

- b. For the relatively small number of projects that did have regional policy factor information in the public comment materials (25 new or significantly changed projects), many of the projects provided incomplete or vague answers with no explanation as to how they promoted non-SOV travel, would reduce VMT, or would contribute to reductions in GHG emissions.
5. **Modeling and evaluating the plan and future no-build condition using telecommuting assumptions from 2014 would be a tremendous missed opportunity and waste of public resources.**
- a. The short Visualize 2045 promotional video shows someone on a video conference meeting, a clear reference to the massive expansion in telecommuting and tele-services that the pandemic accelerated. Yet TPB has proposed modeling and evaluating its projects using 2014 travel habits.
 - b. Use of outdated telework info would falsely inflate the benefits highway agencies claim for many highway and roadway expansion projects that are largely based on the premise of reducing congestion during traditional AM and PM peak commuting hours.
 - c. Telework was steadily rising even before the pandemic. The [2019 State of the Commute Survey](#), showed that 35% of regional commuters in 2019 teleworked at least occasionally, up from 27% in 2013 and 25% in 2010. The report of the 2019 survey results devoted 7½ pages to the topic of changing telework patterns pre-pandemic.
 - d. Looking forward, 33% of the region’s residents anticipate telecommuting at least one day a week after the pandemic, up from 16% who telecommuted at least one day a week pre-pandemic. These [TPB survey results](#) are consistent with the [plans of major regional employers](#), and indicate a future with lower peak hour travel demand.
 - e. TPB should seek federal guidance and check with other MPOs on how they are addressing post-pandemic teleworking in conformity and other regional forecasting. TPB could also perform sensitivity testing using a range of estimated post-pandemic telecommuting rates aside from the official conformity results if they are required to reflect pre-pandemic travel data.
6. **Evaluate how the project network serves regional policy goals like the adopted housing targets.** If we’re committed to equity and supporting the housing crisis, we should shape our transportation system to meet those goals. In justifying the co-benefits of its housing targets, [COG has cited TPB studies](#) that achieving the regional housing targets would help reduce congestion in the region by 20%. The housing targets would locate more housing in the region from outside and would place most of the new housing near high-capacity transit stations in activity centers. This strategy is also one of the COG 2030 Climate and Energy Action Plan transportation strategies. TPB needs to adjust the project and conformity inputs according to its directive to require that member agencies prioritize projects that achieve “COG’s land use and equity goals.”

7. **Consider the public input provided for the plan in choosing the projects and other conformity inputs.** TPB has conducted an impressive survey and series of focus groups for the plan, providing invaluable information and perspectives from the region’s residents, including groups often excluded. Thus, it is disappointing that TPB officials are not asking project sponsors to review their project submissions based on this new information.
- a. When the TPB Community Advisory Committee received a presentation on the Voices of the Region survey at its March meeting, CAC members asked how the survey results would be used. TPB staff responded that it was largely too late for the survey results to influence the projects in the plan, but that hopefully the survey results would guide some aspirational policy statements to be added to the plan and other subsequent transportation planning efforts in the region.
 - b. Important results of the survey, which suggest the current project mix does not adequately represent the priorities and mobility needs of the region’s residents, include:
 - i. When asked “What transportation investments should we make today that future generations will thank us for tomorrow?”, the majority of the answers involved clean transportation, public transportation, and improvements for walking and biking. A much smaller group cited parking and roads, with roads comprising a mix of fixing existing roads and bridges and responses related to more or wider roads.
 - ii. 84% of the region’s residents agree with the statement that elected officials need to consider the impacts of climate change when planning transportation in the future. For residents under 30 years of age, those most impacted by our long-range planning decisions and by climate change, that percentage rises to 92%. In contrast, less than half of respondents (44%) indicated that traffic congestion is a significant concern that impacts their lives, and 25% said congestion was somewhat a concern that impacted their lives a little.
 - iii. 33% of respondents anticipate telecommuting at least one day a week after the pandemic, up from 16% who telecommuted at least one day a week pre-pandemic.
8. **TPB has two options to change course and create a better Visualize 2045 plan – model a climate-friendly plan in addition to the current proposed business-as-usual plan, or remove destructive, unnecessary highway expansion projects now:**

Option 1: Include and model in the conformity scope of work a climate-friendly plan with land use and travel demand management strategies and appropriate projects, in addition to modeling the business-as-usual project list. TPB staff are correct that projects by themselves have limited impact in achieving the outcomes we want. That is

why TPB should create a second “build” scenario that incorporates the strategies that TPB has found to be most effective, with a network of projects that support these:

- Travel Demand Management – including fair parking pricing, commuter benefits, congestion pricing on existing lanes, and other strategies.
- Land Use – prioritizing transit-oriented and compact walkable development in existing activity centers, achieving the regional housing targets, and addressing the east-west jobs/housing imbalance.
- Projects based on TPB’s other Aspirational Initiatives, but restricting any new toll highway projects to installing tolling on existing lanes.

Option 2: Fix the current draft plan now, deleting the road widening projects that will increase driving and emissions and adding in more transit and local street projects that create more walkable, transit-oriented communities. See CSG project-specific comments under comments 10 - 12 below.

- 9. TPB has both time and resources to create a better Visualize 2045.** We believe that TPB can accommodate creating and modeling a climate-friendly plan in its LRTP update schedule. The current Visualize 2045 schedule has 4 extra months: 3 extra months than needed for federal review plus 1 additional month than needed for air quality conformity. The Visualize 2045 process has a roughly \$10 million budget. Alternatively, TPB could collaborate with COG to use its on-call climate consulting contract, or TPB could use part of its TPB Climate Change Study to prepare and model this scenario.
- 10. Change the list of projects.** Repeating \$40 billion in highway and road widening projects is a wasteful public investment given changes in travel patterns accelerated by the pandemic. Even before the pandemic, many of the proposed highway and road widening projects in Visualize 2045 were based on flawed travel assumptions that ignored induced demand and promoted auto-dependent land use and travel inconsistent with regional and local policy goals. CSG recommends the following changes to the list of proposed major highway and roadway projects or supports their inclusion where noted:

Proposed Major Highway Projects

Location	Project Description (Map #, TIP #, description)	CSG Comments
DC	1. I-295 (CE2860) - reconstruct interchange at Malcolm X Blvd, 2022 (\$200M)	Keep in LRTP - because it replaces existing infrastructure and will include improvements for bike/ped
DC	2. South Capitol St (CE3423) - convert to 6 lane urban Blvd., incl. Franklin Douglas Bridge Reconstruction, 2025 (\$777M)	Keep in LRTP - because it replaces existing infrastructure and will include improvements for bike/ped.
DC	3. Lane Reductions/Reconfigurations for Bicycle Lanes, various years, not mapped	Keep in LRTP - but we call for an even higher level of investment at a much faster pace. Other jurisdictions should adopt

		these road configurations as a primary strategy in lieu of road expansions.
Charles	12. US-301 - Governor Harry Nice Memorial Bridge, 2023 (\$768M)	Modify project in LRTP - Current program needs to include ped/bike accommodations, as this is a 100-year decision. Should also include enhanced demand management on 301 corridor.
Frederick	4. I-70 (CE1187, CE2250) - widen to 6 lanes with interchange at Meadow Rd, 2025, 2035 (\$176M)	Remove from LRTP
Frederick	9. US-15 (Frederick Fwy and Catoctin Mtn Hwy) (CE3566, CE3567) - widen to 6 lanes with interchange at Biggs Ford Rd, 2030, 2040 (\$420M)	Remove from LRTP
Frederick	17. MD-85 (Buckeystown Pke) (CE1210) - widen to 4, 6 lanes, 2022, 2035 (\$220M)	Remove from LRTP - Project answered policy questions claiming GHG reductions and promoting non-auto modes but only checking single-occupant vehicle as mode supported. GHG reduction for this widening project is unsupported; project will instead cause induced demand.
Montgomery/ Prince George's	6. I-95/I-495 (CE3281, CE1182, CE6432) - So called "Traffic Relief Plan," construct 2 managed lanes in each direction, 2025 (\$4.2B)	Remove from LRTP, Replace with Alternative - Instead, support alternative transit-oriented Metro and Purple Line station buildout on east side of region to fix jobs/housing imbalance and reduce long-distance car commuting; combine with more transit; and demand management; convert an existing lane to bus/HOV-3.
Montgomery/ Frederick	7. I-270 (CE6432) - So called "Traffic Relief Plan," construct 1 managed lane & convert HOV to managed lane in each direction, 2025 (\$3.4B)	Remove from LRTP, Replace with Alternative - Instead, support alternative transit-oriented Metro and Purple Line station buildout on east side of region to fix jobs/housing imbalance and reduce long-distance car commuting; combine with more transit; and demand management; convert an existing lane to bus/HOV-3. Existing challenge is really to the N to/from Frederick - potential to add just one lane BUT ONLY IF dedicated from the outset to express bus and HOV-3 + adding MARC Brunswick Line service and Route355 BRT.
Montgomery	10. US-29 (Columbia Pke) (CE1197, CE3641) - improve interchanges at Stewart Ln, Tech Rd/Industrial Pkwy, Musgrove Rd/Fairland Rd, Greencastle Rd, and Blackburn Rd, 2030, 2025, 2045 (\$646M)	Remove from LRTP, Replace with Alternative - These interchanges come at a huge cost, and public funds would be better spent in expanding the frequency and coverage of bus rapid transit on US-29 and connecting to 29.
Montgomery	16. MD-28 (Norbeck Rd) / MD- 198 (Spencerville Rd) (CE1462, CE3476) - reconstruct, widen portions to 4 lanes, 2045 (\$413M)	Remove from LRTP - While we offered this idea as an alternative to the Intercounty Connector (ICC) when it was being planned, now with the ICC built, these roads should remain two lanes. Roundabouts can improve intersection performance. Otherwise, widening will fuel more auto-dependent development.
Montgomery	18. MD-97 (Georgia Ave) (CE2618) - widen to 8 lanes, 2030 (\$104M)	Remove from LRTP
Montgomery	19. MD-97 (Brookeville Bypass) (CE1213) - construct 2 lane bypass, 2021 (\$52M)	Remove from LRTP - Bypasses open up new land to sprawling development and

		undermine downtowns; use roundabouts as alternative.
Montgomery	20. MD-117 (Clopper Rd) (CE1203) - widen to 3, 4 lanes, 2030, 2035 (\$69M)	(No comment)
Montgomery	21. MD-124 (Woodfield Rd) (CE1206, CE3057) - widen to 6 lanes, 2035 (\$129M)	(No comment)
Montgomery	26. Midcounty Hwy Extension (MD-83) (CE1245) - construct 4, 6 lanes, 2045 (\$202M)	Remove from LRTP, Replace with Alternative - It would destroy forests, wetlands, streams and harms parks, Ag Reserve, communities. CSG alternative with the TAME group is bus rapid transit on Route 355, express bus on 270, improved local street connections and using roundabouts at intersections; and reducing auto-dependent development in Clarksburg area.
Montgomery	27. Middlebrook Rd Extended (CE1229) - widen to 4 lanes, 2045 (\$16M)	Remove from LRTP
Montgomery	28. Montrose Pkwy East (CE3703) - construct 4 lanes, 2025 (\$120M)	Remove from LRTP, Replace with Alternative - This would further divide White Flint. Instead fund needed local street network, protected bike lanes, and 355 Bus Rapid Transit.
Prince George's	5. I-95/I-495 (CE1479) - interchange at Greenbelt Metro Sta, 2030 (\$196M)	Keep in LRTP - Would add two missing movements to the interchange and would support mixed-use transit-oriented development at the Greenbelt Metro Station. If FBI moves out of DC (not our preference) the Greenbelt Metro is the best location option.
Prince George's	8. US-1 (Baltimore Ave) (CE1202, CE3108) - reconstruct 4 lanes, 2023, 2035 (\$116M)	Keep in LRTP - it includes much safer bike/ped facilities and crossings.
Prince George's/ Charles	11. US-301 (Crain Hwy) - widen to 6 lanes, 2045 (\$4.6B)	Remove from LRTP, Replace with Alternative - The massive cost of this project requires a different approach - stopping sprawling development proposals, looking at local street networks, demand management, and enhanced commuter bus service.
Prince George's	13. MD-3 (Robert Crain Hwy) (CE1195) - widen to 6 lanes, 2035 (\$1.8B)	Remove from LRTP, Replace with Alternative - The massive cost of this project requires a different approach - stopping sprawling development proposals, looking at local street networks, demand management, and enhanced commuter bus service.
Prince George's	14. MD-4 (Pennsylvania Ave) (CE1194, CE3547) - widen to 6 lanes with interchanges at Dowerhouse Rd, Westphalia Rd, and Suitland Pkwy, 2040 (\$533M)	Remove from LRTP, Replace with Alternative - Better local street grid, bus.
Prince George's	15. MD-5 (Branch Ave) (CE1196, CE3469) - upgrade, widen to 6 lanes including interchanges, 2030, 2035 (\$790M)	Remove from LRTP, Replace with Alternative - Enhanced commuter bus service, bus lanes, and TDM investments
Prince George's	22. MD-197 (Collington Rd) (CE2253) - widen to 4 lanes, 2030 (\$94M)	Remove from LRTP, Replace with Alternative - Traffic management using roundabouts and traffic calming, including addition of protected bike/walk facilities but without four laning.
Prince George's	23. MD-202 (Landover Rd) (CE1190) - Largo Town Center Metro Access Improvement, reconstruct 6 lanes, 2045 (\$24M)	Remove from LRTP, Replace with Alternative - Investments that increase

		walk, bike and transit access and safety in the area
Prince George's	24. MD-210 (Indian Head Hwy) (CE1199) - upgrade to 6 lanes and interchange improvement, 2040 (\$754M)	Remove from LRTP - This will induce more traffic and sprawl.
Prince George's	25. MD-450 (Annapolis Rd) (CE1207) - widen to 4 lanes, 2030 (\$67M)	Remove from LRTP - This will induce more traffic and sprawl.
Arlington/ Fairfax	29. I-66 HOT (Inside Beltway) (CE2096, CE3484), revise operations from HOT 2+ to HOT 3+ during peak hours and bus service, 2022, 2040 (\$375M)	Modify project in LRTP - Update the current project so that it is tolled in both directions, goes from HOV-2 to HOV-3 and the continued use of revenues for expanding transit and bike/ped access to transit.
Arlington	31. I-66 (CE3484) - Extend existing westbound acceleration/deceleration lane and add additional lane eastbound 2022, 2040 (\$59M)	(No comment, project completed)
Fairfax/ Prince William	30. I-66 HOT (Outside Beltway) (CE3448) – widen/construct HOT lanes and bus service, 2021, 2022, 2040 (\$4.4B), under construction	Project as designed is a done deal, but note the destructive impact in terms of hundreds of acres of tree loss and expansion of heat inducing pavement and stormwater.
Fairfax	32. I-95/Fairfax County Parkway (CE2667, CE2668) - enhanced interchanges for BRAC, 2025 (\$57M)	(No comment, project likely a done deal necessitated by BRAC decisions)
Fairfax/ Alexandria	34. I-95/I-495 (CE2147) - reconstruct interchange at Van Dorn St, 2030 (\$40M)	(No comment at this time; Need more information on this project.)
Fairfax	37. I-495 (CE2069) - construct 4 HOT lanes with northbound shoulder lane and new ramps, 2025 (\$500M)	Remove from LRTP, Replace with Alternative - Instead of further VA HOT lanes expansion, pursue a regional transit-oriented development and travel demand solution. Meanwhile this proposed project if it goes forward includes far too little money for transit and taxpayers have to pay Transurban if more than 24% of vehicles are buses and carpools.
Fairfax	38. I-495 Auxiliary Lanes (CE3272) - construct 2 auxiliary lanes in both directions, 2030 (\$3M)	(No comment at this time; Need more information on this project.)
Fairfax	39. I-495 (CE3208, CE3186, CE2069) - interchanges at VA 267, 2025, 2030, 2045 (\$70M)	Remove from LRTP, Replace with Alternative - We support bus rapid transit expansion instead.
Fairfax	40. Dulles Toll Rd (VA-267) (CE3151, CE3154) - Collector-Distributor Road west-bound, 2035, 2037 (\$62M)	Remove from LRTP, Replace with Alternative - Silver Line Phase 2, Route 7 BRT, and parking pricing can all reduce driving demand. We should be favoring transit access to Tysons not facilitating more driving into Tysons
Fairfax	41. Dulles Toll Rd (VA-267) (CE3151, CE3154) - Collector-Distributor Road east-bound, 2035, 2036 (\$124M)	Remove from LRTP, Replace with Alternative - Silver Line Phase 2, Route 7 BRT, and parking pricing can all reduce driving demand. We should be favoring transit access to Tysons not facilitating more driving into Tysons
Fairfax	42. Dulles Toll Rd (VA-267) (CE3152) - interchange at New Boone Blvd Extension, 2037 (\$79M)	Modify project in LRTP - Refine as a limited scale interchange connection to the New Boone Boulevard Extension. The new extension is part of the planned Tysons grid of streets and this connection can reduce demand on Route 7.
Fairfax	43. Dulles Toll Rd (VA-267) (CE3153) - interchange at Greensboro Drive/Tyco Rd, 2036 (\$28M)	(No comment at this time; need more information on this project. Possibly

		support as potential connection to the grid of streets within Tysons.)
Fairfax/ Loudoun	44. Dulles Access Rd (VA 267) (CE1965) - widen to 6 lanes including interchange reconstruct at I-495, 2030 (\$40M)	Remove from LRTP, Replace with Alternative - The Silver Line is the appropriate alternative commute mode. Consider turning Dulles Airport Access Road to a HOT lane facility remaining under control of a government entity so maximum revenues can go to transit.
Fairfax	45. US-1 (Richmond Hwy) (CE1942) - widen to 6 lanes, 2028 (\$37M)	Modify project in LRTP - Refine cross section as two lanes in each direction for cars and one in each direction for bus rapid transit. Cost estimate appears to be far too low. Incorporate design changes to reduce the width and for a design speed of 35mph instead of 45mph.
Fairfax	46. US-1 (Richmond Hwy) (CE3180) - widen to 6 lanes, 2035 (\$127M)	Modify project in LRTP - Refine cross section so it does not add new car lanes. If widening continues in this southern section the new lane in each should be limited to use as dedicated bus lanes or dedicated bus and HOV. But it doesn't make sense to do this project without expanding the Occoquan crossing. Note though a new bridge crossing could be restricted by the I-95 Concessionaire Agreement with Transurban.
Fairfax	54. US-29 (Lee Hwy) (CE1933) - widen to 6 lanes, 2040 (\$130M)	Remove from LRTP - I-66 HOT lanes will provide increased capacity for through trips. Wider roads like this divide communities.
Fairfax	55. US-29 (Lee Hwy) (CE3474) - widen to 6 lanes, 2024 (\$32M)	Remove from LRTP - Again, the new I-66 HOT lanes provide additional capacity for longer distance trips. This would also put increased pressure to widen 29 through historic Manassas National Battlefield Park.
Fairfax	57. US-50 (Arlington Blvd) (CE2182) - widen to 6 lanes, 2035 (\$249M)	Modify project in LRTP - Any additional lanes should be BRT only, and bike/ped facilities should be added as part of creating a mixed-use walkable, transit oriented corridor.
Fairfax	59. VA-7 (Leesburg Pke) - (CE3161) widen to 6 lanes, 2030 (\$71M)	Modify project in LRTP - - If lane added it should be limited solely to the Route 7 BRT.
Fairfax	60. VA-7 (Leesburg Pke) (CE2105) - widen to 6, 8 lanes, 2024, 2030 (\$314M)	Modify project in LRTP - Opposed to expansion to 6 lanes unless it was dedicated to BRT. Project is under construction but call for the new lane to be BRT only or BRT + HOV3. We strongly oppose a fourth lane in each direction. Alternative is supporting transit access to Tysons and other job centers.
Fairfax	61. VA-7 (Leesburg Pke) (CE2175) - widen to 6 lanes, 2030 (\$34M)	Remove from LRTP, Replace with Alternative - Opposed to adding lanes for more cars through this diverse area with significant walk, bike and transit using population. If a third lane is added in each direction it should be solely for Route 7 BRT.

Fairfax	62. VA-28 (Sully Rd) (CE1734) - widen to 8-10 lanes, HOV in additional lanes during peak, 2021, 2025, 2040 (\$100M)	Remove from LRTP, Replace with Alternative - This is a longstanding project which illustrates the costs of sprawling auto-dependent development in Eastern Loudoun and Western Fairfax. We oppose 10 lanes and instead support conversion of the fourth lane in each direction to bus only with HOV. This should also be pursued instead of widening the Fairfax County Parkway.
Fairfax	64. VA-123 (Chain Bridge Rd) (CE3376, CE3698) - widen to 6, 8 lanes, 2030 (\$22M)	Remove from LRTP, Replace with Alternative - Opposed to further widening of Chain Bridge Road. Tysons is to be a walkable, bikeable, transit oriented center.
Fairfax	65. VA-123 (Ox Road) (CE1784, CE1856) - widen to 6 lanes, 2030 (\$70M)	Remove from LRTP - Like so many other projects it will increase driving.
Fairfax	66. VA-236 (Little River Tpke) (CE1760) - widen to 6 lanes, 2030 (\$58M)	Remove from LRTP - Full study needed of sustainable transit and bike alternative.
Fairfax	67. VA-286 (Fairfax County Pkwy) (CE2106) - widen to 6, 2030, 2035, 2040 (\$197M)	Remove from LRTP - Promotes more driving and will be followed by pressure to expand development in areas without good transit.
Loudoun	51. US-15 (James Madison Hwy) (CE3738) - widen to 4 lanes, 2026 (\$110M)	Remove from LRTP, Replace with Alternative - A study showed that keeping to two lanes and using roundabouts would be safer, allow for flow, preserve a historic Scenic Byway, and cost far less. Full widening to four lanes is part of Loudoun's plan to widen the whole northern stretch to Point of Rocks and would induce more driving.
Loudoun/ Fairfax	56. US-50 North Collector Road (CE3739) – construct new 4 lane road, 2029 (\$110M)	Remove from LRTP, Replace with Alternative - Can provide an alternative to Route 50 but as part of this, Route 50 lanes (one in each direction) should be converted to dedicated bus + HOV2 or HOV3 lanes. Alternatively, this road and Tall Cedar Parkway could be given dedicated transit lanes.
Loudoun	58. VA-7/US-15 Bypass (Harry Byrd Hwy) (CE1870) - upgrade and widen to 6 lanes, 2040 (\$55M)	(No comment)
Prince William/ Fairfax	33. I-95 (CE3667) - add southbound auxiliary lane, 2022 (\$54M), under construction	Keep in LRTP - To be complete in 2022
Prince William	35. I-95 (CE3697) - construct HOT reversible ramps to access VA-642 (Opitz Road), 2022 (\$60M)	Modify project in LRTP - Support since 95 lanes have been built. Private Funding, No Lane Capacity, Just new ramp from I-95 Express Lanes
Prince William	36. I-95 (CE3556) - construct HOT lanes ramp south of Russell Rd., 2022 (\$16M), under construction	Modify project in LRTP - Support since 95 lanes have been built. Private Funding, No Lane Capacity, Just new ramp from I-95 Express Lanes
Prince William	47. US-1 (Richmond Hwy) (CE3173) - widen to 6 lanes, 2022 (\$125M), under construction (complete 2022)	Modify project in LRTP - Third lane in each direction should be a dedicated BRT lane.
Prince William	48. US-1 (Richmond Hwy) (CE2594) - widen to 6 lanes, 2030 (\$127M)	Modify project in LRTP - Third lane in each direction should be BRT lane.
Prince William	49. US-1 (Richmond Hwy) (CE3291) - widen to 6 lanes, 2040 (\$58M)	Remove from LRTP - because, I-95 (CE3556) - construct HOT lanes ramp south of Russell Rd., 2022 (\$16M) and

		Transforming Rail in VA provides additional capacity for Quantico.
Prince William	50. US-15 (James Madison Hwy) (CE3162) - widen to 4 lanes, 2030 (\$45M)	No comment
Prince William	52. US-15 (James Madison Hwy) (CE3162)- widen to 4 lanes, 2040 (\$54M)	No comment
Prince William	53. US-29 (Lee Hwy) (CE1993) - widen to 5 lanes, 2030 (\$255M)	Remove from LRTP - This is potentially a part of Bi-County Parkway/Manassas Battlefield Bypass and would increase pressure to widen Route 29 through historic Manassas National Battlefield Park.
Prince William	63. VA-28 (Nokesville Rd) (CE2045) - widen to 4 or 6 lanes, 2022, 2040 (\$71M)	Remove from LRTP - This would increase pressures to open up more rural land to development.
Prince William	68. VA-294 (Prince William Pkwy) - widen to 6 lanes, 2040 (\$263M)	Remove from LRTP - Innovative Intersections changes should be sufficient through 2045.
Prince William	69. Manassas Bypass (VA-234 Bypass) - (CE1897) construct 4 lanes, 2040 (costs captured in other projects)	Remove from LRTP - Opens up Rural Crescent to development. I-66 and Route 28 will provide fastest access to Dulles Airport. We support roundabouts for 29 and Pageland, 234 and Pageland, 234 and 659 to move local traffic.
Prince William	70. Manassas Battlefield Bypass (CE3061) - construct 4 lanes and close portions of US-29 (Lee Hwy) and VA-234 (Sudley Rd), 2030, 2040 (\$28M)	Remove from LRTP - Opens up Rural Crescent to development. I-66 and Route 28 will provide fastest access to Dulles Airport. We support roundabouts for 29 and Pageland, 234 and Pageland, 234 and 659 to move local traffic.
Prince William/ Manassas	71. VA 28 Manassas Bypass (CE1865) - construct 4 lanes, 2025 (funding not listed)	Remove from LRTP, Replace with Alternative - The PW County selected version would take affordable homes from immigrant and low-income residents and impact Flat Branch which feeds Bull Run and the Occoquan drinking water supplies. We support innovative design solutions for Route 28 on the east side of Manassas and Manassas Park. Existing 234 bypass and expanded I-66 will provide plenty of capacity for commuter trips.

11. We generally support these valuable transit and rail projects. In the case of a few, we request that they be modified or replaced with better alternatives that do not involve expanded highway lane capacity and promote auto-dependence. In addition, we note projects that need to be explicitly incorporated into Visualize 2045. See comments in table below on major transit/rail projects.

Proposed Major Transit-Rail Projects

Map ID	Project Description	CSG Comments
1	DC Streetcar (CE3081,5754) , 2026, 2040	Keep in LRTP - Prioritize the Benning Road Streetcar Extension

2	DC Dedicated Bicycle Lane Network, various years (not mapped)	Keep in LRTP
3	16th Street Bus Priority Improvements (6638), 2022	Keep in LRTP
4	DDOT H and I street Bus- Only Lanes (grouped project ID 3212)	Keep in LRTP
5	Corridor Cities Transitway BRT (CE1649) - from Shady Grove to COMSAT, 2035	Keep in LRTP
6	North Bethesda Transitway BRT (CE3663) - from Montgomery Mall to White Flint Metro, 2030	Keep in LRTP
7	Veirs Mill Rd BRT (CE3103) - from Wheaton Metro to Rockville Metro, 2025	Keep in LRTP
8	Randolph Rd BRT (CE3662) - from US-29 to MD-355, 2040	Keep in LRTP
9	New Hampshire Ave. BRT (CE3672) - from Takoma Metro to Colesville P&R, 2045	Keep in LRTP
10	MD-355 BRT (CE3424) - from Bethesda Metro to Clarksburg, 2030	Keep in LRTP
11	MARC (CE3427) - Increase trip capacity and frequency along all commuter rail lines, 2029	Keep in LRTP
12	Purple Line (CE2795) - Bethesda to New Carrollton, (completion date under review)	Keep in LRTP - TPB should call for urgent action by the Hogan Administration to restart the project. Related bike/ped, and local street network projects that will improve station access should also be prioritized in the LRTP.
13	Crystal City Transitway Northern & Southern Extension BRT - (CE3521, CE3648), 2022, 2025, 2030	Keep in LRTP
14	Metro Silver Line (Dulles Corridor Metrorail Project) (CE1981) - Phase 2, 2022	Keep in LRTP - Project is in the final phase of construction but needs further bike/ped and local street network projects to provide safe access to the stations. Those are missing at many stations now.
15	Duke St Transitway - (CE2932) King St Metro to Fairfax County line, 2027	Keep in LRTP
16	Potomac Shores VRE Station, (CE2831) 2022	Keep in LRTP
17	Potomac Yard Metro Station, (CE3013) 2022	Keep in LRTP - Support related projects that will improve station access.
18	US-1 BRT from Huntington Metro Station to Woodbridge, (CE3496) 2030	Modify project in LRTP - CSG supports the BRT but we have opposed the road widening of additional segments of Route 1 and would prefer that the configuration were two car lanes in each direction + the two BRT lanes.
19	US-1 bus lanes and improved intersections, (CE1942) 2035	Modify project in LRTP - CSG supports the BRT but we have opposed the road widening of additional segments of Route 1 and would prefer that the configuration were two car lanes in each direction + the two BRT lanes.
20	West End Transitway (CE2930) - Van Dorn St Metro to Pentagon Metro and to Landmark, 2026, 2035	Keep in LRTP
21	VRE - 3rd and 4th track projects to reduce headways along the Manassas and Fredericksburg Lines, (CE2832, CE2420) 2025, 2028, 2035	Keep in LRTP
22	I-495 HOT Lane Express Bus Service, 2030	Remove from LRTP, Replace with Alternative - CSG supports express bus service but opposes the HOT lane extension. In addition to transit, we support a transit-oriented development focus for the region to reduce driving demand.
23	I-66 HOT Lane Enhanced Bus Service (CE3484, CE3448), 2025, 2040	Remove from LRTP, Replace with Alternative - CSG supports express bus service but opposes the HOT lane extension. In addition to transit, we

		support a transit-oriented development focus for the region to reduce driving demand.
24	Additional Long Bridge railroad crossing with two-tracks and pedestrian/bike access, 2027	Keep in LRTP - Also support the full Virginia rail corridor expansion to Richmond and North Carolina
NA	Route 7 BRT (missing from list of Major Projects)	CSG asks for this project to be explicitly included in the plan. We also prefer that the transitway be added without expanding the right of way. As part of this, if there is an existing six car lane section, two lanes should be converted to BRT; if there is a two lane in each direction section, they should use existing median space for the BRT. If there is not a wide median along a two lane in each direction section, a new third lane in each direction must be dedicated to the BRT. (Based on the info provided, it is unclear if the BRT is included in various Route 7 road widening projects as listed in Visualize 2045)
NA	Other regional transit/rail projects at various stages of development across the region (missing from list of Major Projects)	CSG supports including these projects if they meet CLRP project development stage requirements: segments of the 81-Mile Montgomery County BRT network not yet included, the Duke Street Transitway, MARC investment plan, Route 28 BRT in PW and Fairfax, regionwide safe routes to transit projects (bike/ped), Wilson Bridge Metrorail and American Legion Bridge Metrorail.

12. For new/significantly changed minor projects, some of the road widening projects did not fully answer the regional policy factor support questions but make claims that they would promote non-auto travel and reduce VMT. See comments in table below on new/significantly changed minor projects.

New/Significantly Changed Minor Projects

Policy Tables ID (pp. 11-14 of PDF, full packet)	Project	Project Description	CSG Comments
6	MD 85 Buckeystown Pike	Widen MD 85 to a four-lane divided highway from south of English Mountain Way to south of Crestwood Boulevard/Shockley Drive, then six lanes north to Grove Road and including I-270 interchange reconstruction. Auxiliary lanes will be included where necessary. Phases include: Phase 1 (in construction, anticipated complete 2021) - South of Crestwood Boulevard/Shockley Drive to North of Spectrum Drive, including I-270 interchange (see TIP ID 6483 - project cost of \$82,000 has been subtracted from previously provided cost of \$220,000,000)	Remove phases not already under construction from LRTP - Project answered policy questions claiming GHG reductions and promoting non-auto modes but only checking single-occupant vehicle as mode supported. GHG reduction for this widening project is unsupported; project will instead cause induced demand.
7	VA 620 Braddock Rd	Widening Braddock Road between Paul VI Eastern Entrance & Loudoun County Parkway	Provide additional information re. regional policy factor questions to

		from 2 to 4 lanes. This project provides for the planning, design, right-of-way acquisition, and construction to widen Braddock Road (Route 620) to four lanes between the Eastern Entrance of Paul VI high school and Loudoun County Parkway. The project entails the construction of a four lane, median-divided roadway within a 90 -foot right-of-way and includes the construction of shared use paths on both sides of the road. This project provides a Shared Use Path (SUP) that promotes bike and walking to regional transit that serves Metrorail Stations.	document how this road widening project promotes non-auto travel and VMT reduction. This is very distant from the Loudoun Metro stations.
8	Worldgate Dr Ext.	Herndon Metrorail Intermodal Access Improvements - PH II - (Worldgate Drive Extension at Herndon Parkway). Worldgate Drive Extension will link Van Buren Street to Herndon Parkway to alleviate congestion for the transit-oriented core of the Herndon Metrorail Station Area	Keep in LRTP
9	VA 607 Loudoun Cty Pky	This project provides for right-of-way acquisition for the widening of Loudoun County Parkway (Route 607) from four to six lanes between Ryan Road (Route 772) and Shellhorn Road (Route 643), and the construction of turn lanes at the intersection. Construction of the roadway improvements are proffer conditions of the Silver District West development	Provide additional information re. regional policy factor questions to document how this road widening project promotes non-auto travel and VMT reduction. Six-lane high-speed arterials divide communities and undermine bike/walk/transit unless the 6th lane is dedicated to bus.
10	VA 645 Croson Ln	This project provides for the planning, design, right-of-way acquisition, and construction to widen Croson Lane (Route 645) to four lanes between Claiborne Parkway (Route 901) and Old Ryan Road (Route 722). The project entails the construction of a four-lane, median-divided roadway within a 120-foot right-of-way, and includes the construction of a sidewalk on one side of the road and a shared use path on the other side.	Support in LRTP if ROW is reduced to limit the road to four lanes with full bike ped access on both sides of the road.
11	VA 659 Belmont Ridge Rd	VA 659 Belmont Ridge Road, Reconstruct. Construct or widen to a four-lane, divided road on a six-lane RW.	Do not support in LRTP
12	Crosstrail Blvd	Segment C. This project provides for the planning, design, right-of-way acquisition, and the construction of a four-lane median divided road as a Major Collector between Sycolin Road and the Dulles Greenway on a 120 ft. wide right- of- way. The project also includes shared use paths on both sides of Crosstrail Boulevard and a bridge over Sycolin Creek.	(Appears to be already in progress)
13	VA 3171 Northstar Blvd	This project provides for the planning, design, right-of-way acquisition and construction of the remaining two lanes of Northstar Boulevard between Tall Cedars Parkway (Route 2200) and Braddock Road (Route 620). The project will include a shared use path along the new travel lanes, modifications to an existing traffic signal and new traffic signals where warranted	Do not support in LRTP

14	Annapolis Way Extension	Construct approximately 0.28-mile segment of roadway between existing segments of Annapolis Way to create a connection between Route 1 and Route 123 (Gordon Blvd). #3753	Support in LRTP with lanes limited to 10 to 11 feet width
15	Horner Rd	Construct extension of Marina Way to connect with Horner Road at Route 123 to create a parallel facility to Route 1 and I-95 and create internal road network to enhance access to Woodbridge VRE station and Route 123 Commuter lot. Extension will be constructed as a four-lane Urban Boulevard.	Support in LRTP with lanes limited to 10 to 11 feet width
16	Dale City Pkwy Node New Through Blvd	Construct an approximately 0.5-mile new thorough boulevard between Minnieville Road and Elm Farm Road that will create a connection between Minnieville Road and the Prince William Parkway (Route 294).	Support in LRTP
17	Williamson Blvd	Construct a new 4-lane facility; alternate facility to Route 234, #2176	CSG requests more information on why the project cannot be built with two lanes rather than four if it is intended to promote non-auto travel.
18	Alexandria 4th Track	Constructs 6 miles of fourth track from Control Point AF in Alexandria to the RO interlocking near the south bank of the Potomac River in Arlington	Support in LRTP
19	Broad Run Expansion	This project includes expansion of the Broad Run Maintenance and Storage Facility (MSF) and Station to support expanded Manassas Line service.	Support in LRTP
20	Observation Drive	Design and construction of a 2.2 mile long roadway within a minimum 150-foot right-of-way. The project provides multimodal access including provisions for two stations of the proposed Corridor Cities Transitway and for the MD355 BRT that will operate in the median of Observation Drive.	We believe narrower ROW would be appropriate for a transit corridor using a max of 2 vehicle lanes in each direction and two dedicated lanes for BRT along with bike/ped facilities.