Coalition for Smarter Growth
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To: **TPB Public Comment**

From: **Stewart Schwartz, Executive Director**
Bill Pugh, Senior Policy Fellow

Date: **May 1, 2022**

Re.: **Comments on draft Visualize 2045 long-range transportation plan**

Summary:

1. Our primary comments are contained in the joint letter with over 30 other organizations from across TPB's region. In summary, these are:
    - Many TPB members put business-as-usual projects into the plan despite TPB requirements, adopted regional policies, and overwhelming public comments which call for prioritizing projects that support transit-oriented communities, non-auto modes and fighting climate change.
    - As a result, this Visualize 2045 fails to make progress on climate change or car dependence since TPB's last plan from 2018.
    - This is unacceptable, but you can still change this, through the steps our groups ask for in that letter.

2. Highway and arterial expansion projects in Visualize 2045 would generate 3 to 4 billion additional vehicle miles traveled per year - yet many TPB members submissions drafted by transportation staff claim that they will reduce climate pollution. Research shows that road expansion induces additional demand and increases greenhouse gas emissions.

3. The shortcomings of the road expansion approach and the benefits of transit and TOD are shown in the much larger increase in job access from transit, with auto access hardly improving despite twice the investment. These job access data also show that the plan fails to adequately address the east-west divide of regional economic and racial equity, with a wide area of Prince George's County being left behind in job access and also without robust transit options.

4. The "Mitigating Climate Change" section of the plan needs revision to clearly communicate the key takeaways of TPB's climate study:
    - Achieving regional climate targets to keep emissions at safe levels is doable,
    - This requires specific levels of per capita VMT reduction and EV adoption,
    - The full slate of mode shift and vehicle strategies are needed, and
    - TPB members must commit to these goals and strategies and take action.

5. The Voices of the Region surveys and focus groups were excellent but the results were presented to board members late in the process. Nevertheless, they show strong support for addressing climate change in our transportation plan and prioritizing transit, walk, and bike modes.

6. The performance results need to be further broken out by sub-areas (core, inner, outer) and also reported in detail in a technical appendix to inform TPB members and stakeholders.

7. Several aspects of the plan update are commendable and we look forward to these continuing in further TPB work and informing member agencies.

8. There are Important lessons learned from this process that TPB staff need to start applying now to prepare for a successful update to the plan starting this Fall and due in 2024 per resolution of the TPB.

9. Comments on specific projects are provided in the attached tables.

Details:

1. Our primary comments are provided in the joint letter with over 30 other organizations from across TPB's region.

In summary these are:

- Many TPB members submitted a business-as-usual set of projects heavy on roadway capacity expansion that ignored the new project submission policy guidance, the initial results of TPB's climate change mitigation study, Voices of the Region survey results, and public comments received on the draft project list and conformity inputs.
- Too many TPB members ignored their own adopted policy commitments, including the COG 2030 Climate and Energy Action Plan, 2010 Region Forward vision plan, 2019 Regional Housing Targets, and 2021 high-capacity transit station planning framework.
- TPB members were offered an opportunity to change their project inputs last summer but made no substantive changes in the current plan.
- The letter lays out changes necessary to improve the Visualize 2045 plan, such as setting specific, numerical targets for adopting electric vehicles (20 to 25% of vehicles on the road by 2030) and reducing per capita passenger vehicle miles traveled by 15 to 20% by 2030, and committing to pursue the full slate of strategies that TPB's climate change study shows are necessary to meet the region's adopted 2030 climate target.

Below are additional points not covered in the joint letter.

2. Highway and arterial expansion projects in Visualize 2045 would generate 3 to 4 billion additional vehicle miles traveled per year - yet many TPB members claim road expansion projects will reduce climate pollution.

- Visualize 2045 fails to address and explain the important factor of induced demand or induced travel, which is critical for understanding how transportation investments, in particular road expansion, perform over time. The plan needs to analyze and report how its $28.2 billion in highway and arterial expansion projects will induce more vehicle miles traveled and explain to TPB member agencies and the public why many of these projects – and the auto-oriented land use that accompanies them – will not improve accessibility to jobs, services and homes in the long-term.
- Using the State Highway Induced Frequency of Travel calculator (shift.rmi.org), CSG estimates that the 893 new lane miles of highways and arterials proposed in this Visualize 2045 would generate 3 to 4 billion additional vehicle miles traveled each year.[1] This travel would largely occur

[1] CSG reports this induced VMT as an order-of-magnitude number. Visualize 2045 (p. 175) does not provide a breakdown of the 682 miles of new freeway/expressway lanes and 211 miles of new arterial lanes by functional class or jurisdiction. CSG estimated the portions of these lane mile totals likely to

on top of that anticipated from population and job growth, and is a significant relative increase in highway and arterial VMT.

- Without this massive increase in driving demand – and by instead shifting much of that investment to build walkable, bikeable transit-oriented communities – Visualize 2045 could achieve the much larger reductions in per capita VMT that TPB's own climate study says are needed.
- The plan notes that for 185 projects, their sponsor agencies claimed the projects would help the region attain its goal of reducing greenhouse gas emissions by 50% by 2030. However, many of these projects are for roadway capacity expansion and the boilerplate justification statements by several agencies are unsubstantiated, choosing to ignore the evidence that induced demand offsets the short-term emissions benefits of reducing stop-and-go driving. See the clear explanation in this article by transportation expert Joe Cortright.
- Here are the statements used by several agencies for their road expansion projects in the "Regional Policy Documentation – Technical Inputs Policy Question Responses for all Projects":
    - **Fairfax County:** "This project helps to alleviate traffic congestion on [road name] and allows for a more efficient transportation network. The project enhances continuity and lowers emissions from automobiles,"
    - **Maryland Department of Transportation:** "While the project will increase auto capacity, it also will improve level of service (LOS), reducing congestion, idling, and emissions in the corridor."
    - **Prince George's County:** uses this same language as MDOT for its many highway and arterial expansion projects.
    - **City of Manasas:** "Project will improve operations and reduce congestion to mitigate GHG emissions,"
    - **Prince William County:** "Project alleviates congestion to reduce GHG emissions and includes ped/bike facilities to provide non-motorized transportation options."
    - **Loudoun County:** "The project assumption is that building this project will reduce congested streets and or intersections leading to a reduction in vehicle emissions."

  Note that this regional policy documentation for most of the Visualize 2045 projects (all projects carried over from the last plan without any major changes) – and statements such as these – was not available during the April 2021 public comment period on the conformity inputs and escaped public scrutiny.

3. The shortcomings of the road expansion approach and the benefits of transit and TOD are shown in the much larger increase in job access from transit, with auto access hardly improving despite twice the investment. These job access data also show that the plan fails to adequately address the east-west divide of regional economic and racial equity, with a wide area of Prince George's County being left behind in job access and also without robust transit options.

- Regionwide, expanding job access by auto through road capacity expansion is not an effective strategy compared to expanding job access by land use planning, transit-oriented development,

correspond with interstate and principal arterial roadway classifications and applied them with the SHIFT calculator. TPB should provide more precise breakdowns of the new lane miles by roadway class and jurisdiction location to help its member jurisdictions and the public understand the impacts of induced demand by these projects.

and transportation demand management, in coordination with transit investment. As a result of regional transit-oriented development efforts, jobs accessed by transit would grow more than jobs accessed by auto from present until 2045, despite the plan spending twice as much on highway expansion as transit expansion.

- The HOT lanes are not a good deal for Prince George's County residents, who would have the lose-lose choice of paying very high tolls or sitting in the traffic congestion in the general purpose lanes that the private toll road company counts on. More jobs at transit stations in Prince George's is the more effective transportation solution. TPB members and the State of Maryland could do much more to help Prince George's County realize its transit-oriented development plans.

4. Mitigating Climate Change section (p. 129) needs revision to clearly communicate the key takeaways of TPB's climate study: that this is doable, requires specific levels of per capita VMT reduction and EV adoption, needs the full slate of mode shift and vehicle strategies, and that TPB members must step up.

- The section needs to be revised to clearly communicate the key findings of TPB's climate change study, which were that:
    - Achieving the necessary reductions in on-road transportation emissions is feasible to meet the region's climate plan.
    - The key strategies required to achieve the region's targets are both mode shift/travel behavior *and* rapid adoption of electric vehicles.
    - The levels of implementation needed are 1) achieving adoption of electric vehicles in the range of 20 to 25% of passenger vehicles on the road by 2030, and 2) reducing per capita passenger vehicle miles traveled by 15 to 20% by 2030.[2]
    - These strategies would promote other adopted regional goals such as prioritizing walkable transit-oriented land use and investments to support it, reducing VMT, and improving air quality.
- The section presents a misleading message – its apparent takeaway in the prominent text box on the first page is that nothing decisionmakers can do will meet important greenhouse gas reduction targets. The key takeaway on the first page should instead be: *We can achieve the 2030 target with feasible strategies that are consistent with many other adopted regional goals for equity and livability – but only if TPB member agencies show leadership.*
- Greenhouse gas performance of the current plan is buried at the very end of the plan on page 225, without referencing TPB's adopted targets or noting how the plan performs relative to COG and TPB's newly adopted 2030 regional goal. Please add this important context and give these results more prominent treatment.
- The section needs to set a strong on-road transportation greenhouse gas reduction goal, and set specific, numerical targets for adopting electric vehicles (20 to 25% of vehicles on the road by 2030) and reducing per capita passenger vehicle miles traveled by 15 to 20% by 2030. Only by setting these sub-goals, which are based on the findings of TPB's climate change study, will this plan be informative to our decisionmakers and hold them accountable in fighting the climate crisis.

[2] These needed implementation levels are based on TPB's climate study, Combination Scenarios #2, 3, and 4, which successfully met the COG 2030 climate plan reduction levels for on-road transportation. The COG climate plan's level of greenhouse gas reduction should be considered a minimum, since metropolitan areas will need to achieve deeper levels of reduction in transportation emissions to help their states (which include rural areas) meet greenhouse gas reduction targets.

- The resiliency section (pp. 135-136) needs to acknowledge the role of massive highway expansion and auto-oriented sprawl in decreasing the region's climate resiliency, exacerbating stormwater runoff from increased flooding and making heat island effects worse from their pavement. Spending $28.2 billion to expand highways and arterials also diverts needed funding from improving the resiliency of our existing infrastructure, which this plan section notes is a challenge.
- We are glad this section points out the importance of providing affordable housing near transit on page 136. However, this section should reframe this not just as a way to make transportation-climate strategies more equitable, but as a critical and very effective transportation-climate strategy in and of itself. Shifting funding from road expansion to affordable housing near transit would not only reduce VMT and emissions, it would help address the social and economic inequity in our region.
- The TPB staff summary presentation also needs to better communicate this fundamental issue of climate change. The Top 3 Things to Know slide says, "We make progress on our goals - but also face challenges", and lists delay and congestion first, but doesn't even mention the existential threat of climate change.

5. Voices of the Region surveys and focus groups were excellent but the results were presented to board members too late in the process.

- The public involvement had a great public opinion survey and focus groups but came too late in the process
    - Voices of the Region results were not presented to Board members until February 2021, after their deadline for submitting projects
    - Focus group results were not presented to the Board until November 2021, well after the conformity inputs had been finalized
    - Aspiration to Implementation public engagement was launched after the conformity inputs were already finalized in July 2021, making it of little to no value for the public's time.
- Public comment materials on the draft plan in April 2022 did not provide any easily digestible summary information, just a 150MB PDF that was 236 pages long and technical appendices.
- The plan's main document, while including good new background information on transportation in the region and the factors shaping it, is simply too long, with some redundant content.
- The climate section of the plan is incomplete, with anticipated revisions noted on page 133 pending Board action; however, TPB staff indicated that the revised climate section will not be advertised for public review and comment before the Board considers adoption in June. We think the public (and all parties commenting on this current draft) should be notified of the revised section and given a chance to comment, given the importance of climate change to the region's residents, as indicated in TPB's survey results and comments received.
- The public engagement and opinion surveys already conducted will be useful for the next, early update of Visualize 2045 starting at the end of 2022. However, this will depend on TPB members providing serious consideration to the public input and using Voices of the Region to inform their agency project prioritization and submissions to Visualize 2045 and the TIP.
- The Visualize 2045 process needs to allow for in-person or live virtual public testimony to TPB board members. Having staff summarize comments is inadequate and undermines the democratic process. The time has come for TPB to restore live public testimony.

6. Performance results need to be further broken out by sub-areas and also reported in detail in a technical appendix to inform TPB members and stakeholders

- Travel data at the sub-regional level reflect the different transportation and land use policy decisions made by jurisdictions as well as other factors. These forecast outcomes are often washed out when results are simply reported at the regional level.
- Sub-area data (core, inner, outer suburbs) are important and need to be expanded in the Performance Analysis section of the plan (pp. 215-225) to inform TPB members and the public.
    - Breakdown of mode share for core, inner and outer suburbs should have the base year 2023 as well as 2045, and there need to be charts that show this for both all trips as well as for commute trips.
    - For example, Fig. 8.19 only has 2045 data, rather than also showing the 2023 base year data that would make this more informative. Also, it only reports commute trips; a second chart for all trips is needed that likewise compares 2023 and 2045 data by sub-area.
    - VMT data likewise need to be broken down into sub-areas (2023 and 2045, total, per capita, and per capita for residents)
    - The plan does a good job reporting similar performance information for the past decade in figures 2.12 and 2.13. It should provide similar levels of detail for the forecast performance analysis.
- As 2030 is a crucial milestone year for slashing greenhouse gas emissions, Visualize 2045 should also report key measures like VMT and mode share for that year. This interim year would also inform TPB members on the forecast performance of their near and mid-term transportation investments which require funding decisions in the coming years.
- A separate appendix on the Performance Analysis is needed to provide more data relating to the analyses and results summarized in pages 215-225.

7. Several aspects of the plan update are commendable and we look forward to these continuing in further TPB work and informing member agencies

- The Voices of the Region survey and focus groups were very impressive.
- Incorporating quotes by the region's residents and workers in the plan was a powerful way to communicate their mobility needs and the real world impact of transportation plans and projects.
- The new equity analysis on exposure to heavy traffic volumes contributes important information. We are looking forward to the new analyses that TPB staff proposed to the Technical Committee and Board this spring that will be incorporated in plan updates.
- The long narrative and discussion of climate and equity issues among others is well-illustrated, but it is unfortunate that the TPB and COG goals expressed in this section did not lead to a reshaping of the project list.

8. There are important lessons learned that TPB staff need to start applying *now* to prepare for a successful update to the plan starting this Fall

- Agencies ignored the submission guide requirements and new regional policies, and submitted the projects they would have anyway. More accountability needs to be built into the process.
- Performance data on this plan and public engagement results need to be broken down and shared in workshops with member agencies *before* the project submission process.
- TPB members need to be informed about induced demand and its impact on increased GHG emissions, as the TPB climate change study did not address this topic in detail.

9. Comments on specific projects. See attachment on the following pages.

Attachment: CSG Comments on Projects in Visualize 2045 Plan, April 2022 draft

Proposed Major Highway Projects (includes HOT, HOV and Toll Lane Projects)

Location	Project Description (Map #, project #, description)	CSG Comments
DC	1. I-295 (T5723) - reconstruct interchange at Malcolm X Blvd, 2022 ($215M)	Keep in LRTP - because it replaces existing infrastructure and will include improvements for bike/ped
DC	2. South Capitol St (T3423) - 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	11. US-301 (Governor Harry Nice 'Mac' Middleton Memorial Bridge) (T5527): replace with new 4-lane bridge, 2023 *($636M)*	Modify project in LRTP - Current program needs to include protected 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	8. US-15 (Frederick Fwy and Catoctin Mtn Hwy) (CE3566, CE3567) - widen to 6 lanes with interchange at Biggs Ford Rd, 2030, 2040 ($840M)	Remove from LRTP
Frederick	16. MD-85 (Buckeystown Pke) (CE1210, T6483) - widen to 4, 6 lanes, 2035 ($230M)	Remove from LRTP

Montgomery/ Prince George's/Frederick	6. I-270 (T6432, T11582, T11583): So called "Traffic Relief Plan," construct 1 managed lane and convert HOV to managed lane in each direction, 2025 ($3.97B)	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	9. US-29 (Columbia Pike) (CE1197, T3641) - improve interchanges at Stewart Ln, Tech Rd/Industrial Pkwy, Musgrove Rd/Fairland Rd, Greencastle Rd, and Blackburn Rd, 2030, 2025, 2045 ($738M)	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	15. MD-28 (Norbeck Rd) / MD-198 (Spencerville Rd) (T3476) - reconstruct, widen portions to 4 lanes, 2045 ($287M)	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	17. MD-97 (Georgia Ave) (CE2618) - widen to 8 lanes, 2030 ($104M)	Remove from LRTP
Montgomery	18. MD-97 (Brookeville Bypass) (T3106) - construct 2 lane bypass, 2021 ($44M)	Bypasses open up new land to sprawling development and undermine downtowns; should use roundabouts as alternative.
Montgomery	19. MD-117 (Clopper Rd) (CE1203) - widen to 3, 4 lanes, 2030, 2035 ($69M)	(No comment)
Montgomery	20. MD-124 (Woodfield Rd) (CE3057) - widen to 6 lanes, 2035 ($120M)	(No comment)
Montgomery	25. Middlebrook Rd Extended (CE1229) - widen to 4 lanes, 2045 ($16M)	Remove from LRTP

Montgomery	26. Montrose Pkwy East (T3703) - construct 4 lanes, 2045 ($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 (T2894) - interchange at Greenbelt Metro Sta, 2030 ($124M)	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	7. US-1 (Baltimore Ave) (CE1202, T3108) - reconstruct 4 lanes, 2023, 2035 ($169M)	Keep in LRTP - it includes much safer bike/ped facilities and crossings.
Prince George's/ Charles	10. US-301 (Crain Hwy)(CE1004) - 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	12. MD-3 (Robert Crain Hwy) (T6394) - widen to 6 lanes, 2035 ($906M)	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-4 (Pennsylvania Ave) (CE1194, T3547) - widen to 6 lanes with interchanges at Dowerhouse Rd, Westphalia Rd, and Suitland Pkwy, 2040 ($750M)	Remove from LRTP, Replace with Alternative - Better local street grid, bus.
Prince George's	14. MD-5 (Branch Ave) (CE1196, T3469) - upgrade, widen to 6 lanes including interchanges, 2030, 2035 ($804M)	Remove from LRTP, Replace with Alternative - Enhanced commuter bus service, bus lanes, and TDM investments
Prince George's	21. 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	22. 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	23. MD-210 (Indian Head Hwy) (CT6524, T4879) - upgrade to 6 lanes and interchange improvement, 2040 ($585M)	Remove from LRTP - This will induce more traffic and sprawl.
Prince George's	24. MD-450 (Annapolis Rd) (CE1207) - widen to 4 lanes, 2030 ($67M)	Remove from LRTP - This will induce more traffic and sprawl.
Arlington/ Fairfax	27. I-66 HOT (Inside Beltway) (CE3484, CE2096), 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	29. I-66 (CE3484): Extend existing westbound acceleration/deceleration lane and add additional lane eastbound 2022, 2040 *($59M)*	(No comment, project completed)
Fairfax/ Prince William	28. 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	30. I-95/Fairfax County Parkway (CE2668) - enhanced interchanges for BRAC, 2025 ($57M)	(No comment, project likely a done deal necessitated by BRAC decisions)
Fairfax/ Alexandria	32. 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	35. I-495 (CE2069, CE3186, CE3208): construct 4 HOT lanes with northbound shoulder lane and new ramps and interchanges at VA 267, 2025, 2030, 2045 *($570M)*	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	36. 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	37. Dulles Toll Rd (VA-267) (CE3151, CE3154) - East- bound and west-bound Collector-Distributor Roads, 2035, 2036, 2037 *($186M)*	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	38. 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	39. 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	41. US-1 (Richmond Hwy) (CE1942) - widen to 6 lanes, 2028 ($415M)	Modify project in LRTP - Refine cross section as two lanes in each direction for cars and one in each direction for bus rapid transit. Incorporate design changes to reduce the width and for a design speed of 35mph instead of 45mph.
Fairfax	42. 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	50. 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	51. US-29 (Lee Hwy) (CE3474) - widen to 6 lanes, 2024 ($86M)	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	53. 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	55. VA-7 (Leesburg Pike) - (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	56. 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. Portion of project is under construction but should 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	57. 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	58. 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	60. 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	61. 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	62. 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	63. VA-286 (Fairfax County Pkwy) (CE2106, T6694) - widen to 6 lanes, 2030, 2035, 2040 ($198M)	Remove from LRTP - Promotes more driving and will be followed by pressure to expand development in areas without good transit.
Loudoun	48. US-15 (James Madison Hwy) (CE3738) - widen to 4 lanes, 2026 ($111M)	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	52. 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	54. VA-7/US-15 Bypass (Harry Byrd Hwy) (CE1870) - upgrade and widen to 6 lanes, 2040 ($55M)	(No comment)
Prince William/ Fairfax	31. I-95 (T6682) - add southbound auxiliary lane, 2022 ($32M), under construction	Keep in LRTP - To be complete in 2022
Prince William	33. I-95 (T11510) - 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	34. 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	43. 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	44. 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	45. 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	46. US-15 (James Madison Hwy) (T6693) - widen to 4 lanes, 2030 ($45M)	No comment
Prince William	48. US-15 (James Madison Hwy) (CE3738)- widen to 4 lanes, 2026 ($111M)	No comment
Prince William	49. US-29 (Lee Hwy) (T4794) - widen to 5 lanes, completed ($212M)	No comment, as status is completed
Prince William	59. 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	64. VA-294 (Prince William Pkwy) (CE2718): widen to 6 lanes, 2040 ($263M)	Remove from LRTP - Innovative Intersections changes should be sufficient through 2045.
Prince William	65. 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	66. 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	67. VA 28 Manassas Bypass (CE1865) - construct 4 lanes, 2025 ($228M)	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.

Proposed Major Transit-Rail Projects

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.

Map ID	Project Description	CSG Comments
1	DC Streetcar (CE3081,5754) , 2026, 2040 ($545M)	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 ($2M)	Keep in LRTP
4	DDOT H and I Street Bus-Only Lanes (part of T3212)($1.1M)	Keep in LRTP
5	Corridor Cities Transitway BRT (CE1649) - from Shady Grove to COMSAT, 2035 ($545M)	Keep in LRTP
6	North Bethesda Transitway BRT (CE3663) - from Montgomery Mall to White Flint Metro, 2030 ($115)	Keep in LRTP
7	Veirs Mill Rd BRT (CE3103) - from Wheaton Metro to Rockville Metro, 2030 ($82M)	Keep in LRTP

8	Randolph Rd BRT (CE3662) - from US-29 to MD-355, 2040 ($102M)	Keep in LRTP
9	New Hampshire Ave. BRT (CE3672) - from Takoma Metro to Colesville P&R, 2045 ($285M)	Keep in LRTP
10	MD-355 BRT (T6396) - from Bethesda Metro to Clarksburg, 2030 ($1B)	Keep in LRTP
11	MARC (CE3427) - Increase trip capacity and frequency along all commuter rail lines, 2029 ($1B)	Keep in LRTP
12	Purple Line (CE2795) - Bethesda to New Carrollton, 2023 ($2.7B)	Keep in LRTP. 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 ($52M)	Keep in LRTP
14	Metro Silver Line (Dulles Corridor Metrorail Project) (CE1981) - Phase 2, 2022 ($2.9B)	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 ($19M)	Keep in LRTP
16	Potomac Shores VRE Station, (CE2831) 2022 ($26M)	Keep in LRTP
17	Potomac Yard Metro Station, (CE3013) 2022 ($268M)	Project is in the final phase of construction. Support related projects that will improve station access.
18	US-1 BRT from Huntington Metro Station to Woodbridge, (T6680): 2030 ($504M)	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 ($37M)	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 ($420M)	Keep in LRTP
21	VRE (CE2832, CE2420): 3rd and 4th track projects to reduce headways along the Manassas and Fredericksburg Lines, 2025, 2028, 2035 ($105M)	Keep in LRTP
22	I-495 HOT Lane Express Bus Service, 2030 ($254M)	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 ($375M)	As HOT lanes is a done deal, keep in LRTP. In addition to transit, we support a transit-oriented development focus for the region to reduce driving demand.
24	Additional Long Bridge (T6727): railroad crossing with two-tracks and pedestrian/bike access, 2027 ($1.9B)	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, 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.