



Megan Gallagher, Director

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June 22, 2008

Jennifer Hibbert  
Transportation Planner  
Central Shenandoah PDC  
112 MacTanly PI  
Staunton, VA 24401

**RE: Rural Long Range Transportation Plan  
Draft Phase II Summary Report**

By Fax and Mail

Dear Ms. Hibbert:

The Shenandoah Valley Network (SVN) and its member group, Rockingham Community Alliance for Preservation (CAP), offer the following comments on the draft Phase II Summary Report for VDOT's Rural Long Range Transportation Plan.

SVN links citizens groups working on transportation, land use and land protection issues in seven Valley counties: Augusta, Highland, Rockingham, Shenandoah, Page, Warren and Frederick. CAP works to increase citizen involvement in Rockingham County and the City of Harrisonburg in land use, land protection and road planning to retain our rural heritage and build and sustain liveable communities.

In the Phase II Regional Rural Long-Range Transportation Plan, we understand that localities and the Central Shenandoah Planning District Commission are determining what "Study Corridors" and intersections will be selected for more in depth planning and study in Phase III. Both the methodologies used to select the corridors and intersections for future planning and some of the sites selected are of concern to SVN and CAP.

Even though traffic counts are declining on a statewide level due to high fuel prices, the Phase II planning projections are based on historic traffic counts.

"Each locality representative is to examine the 2035 traffic forecasts for the roadways in their areas and indicate if these forecasts are reasonable. The forecasts are derived from historic traffic numbers. Growth rates are calculated from historic traffic volumes and then applied to project traffic volumes in future years. Because the

forecasts are *solely* based on historic volumes, they will likely underestimate traffic volumes in high growth areas in the localities. When reviewing the numbers, if the locality does not think the 2035 traffic forecasts are reasonable, please indicate next to the traffic volume and provide some sort of justification. The justification can simply be one sentence in length; it does not need to be an elaborate explanation. The results of this review will be used to edit the VDOT traffic database and if a forecast is edited in the VDOT database, there must be a justification provided.” *Minutes, Meeting 2/27/08*

The Phase II document does not reveal the years the historic data is drawn from, but unless it is from the last 18 months, the data is unlikely to capture the decline in traffic volumes that has occurred as the price of gas has escalated past \$4.00 per gallon. Traffic counts will continue to decline as the price of gas continues to increase.

The plan should be revised to divulge the traffic data used. If data from the last 18 months is not included, the projections should be revised on the basis of the most recent data that reflects the impact of higher fuel prices on traffic patterns.

Decisions in Phase II about what to study in greater depth in Phase III are based upon “anecdotal information.”

“Discussion followed from the group concerning the prioritization of intersections and corridors. Jennifer reported that, as of yet, only anecdotal information is needed to judge whether an intersection or corridor is problematic.” *Minutes, Meeting 4/18/08*

The high cost of road safety and congestion improvements and the prolonged shortage of road improvement funds demands a much more rigorous analysis than conjecture with, seemingly, no timely traffic, congestion or accident report data. Phase II should be revised to reflect a concrete analysis based on this kind of data with sites ranked by objective measures.

There is no analysis of the potential impacts of improvements to rural road sites with significant natural, historic or cultural resources nor any recommendations for addressing those impacts in Phase III planning.

Three of the areas identified for further study in *Table 1: Recommended Corridors for Phase III* are of concern to the SVN and CAP.

Locality	Type	Roadway Name	Starting Point	Ending Point	Comments
Highland County	Designated Study Corridor	Highland Tpke. (US 250)	Ramsey's Draft Fire Rd	Highland Turnpike (US 250) - Approx. 0.75 miles south east of Lower Fork Rd. (SC 616)	Safety Improvements - widening of pavement and passing lanes
Rockingham County	Bad intersection	Route 340 & Port Republic Rd. (SR 253)			
Rockingham County	Designated Study Corridor	Port Republic Rd. (SR 253)	Cross Keys Rd. (SR 276) - HRMPO SE Boundary	East Side Hwy. (US 340)	

*Table 1: Recommended Corridors for Phase III*

The “Designated Study Corridor” in Highland County is on Shenandoah Mountain, adjacent to the Ramsey’s Draft Wilderness Area within the George Washington National Forest, and within the study and core areas of the McDowell Battlefield, part of the Shenandoah Valley Battlefields National Historic District.

The “Designated Study Corridor” in Rockingham County includes the Cross Keys and Port Republic Battlefield core areas, within the Shenandoah Valley Battlefields National Historic District and extensive acreage within Rockingham County’s Agricultural Reserve zoning area, including at least one ag and forestall district.

The “Bad Intersection” in Rockingham County is on the Port Republic Battlefield, part of the Shenandoah Valley Battlefields National Historic District.

Due to the highly sensitive resources at sites selected for further study, we recommend that the Phase III study employ all of the tools of the Context Sensitive Solutions approach to road planning.

Context Sensitive Solutions (CSS) is a program of the Federal Highway Administration that has been endorsed by the Commonwealth Transportation Board and VDPT. CSS is a collaborative, team approach.

In CSS, all stakeholders are identified at the inception of a project, and may include local residents, citizens groups, economic groups (farmers, small and large businesses), historic preservation professionals, county planners, landscape architects, and environmental engineers. Representatives of each stakeholder group are then brought together to work as a team with transportation engineers.

Stakeholders have an equal voice and their expertise is used from the beginning of the planning process. For example, civil engineers have primary say on road safety issues, while a historian could modify the design to protect important cultural resources and an environmental engineer would have the power to protect ecologically fragile areas.

Through a process of give and take, the resulting solution balances transportation safety and mobility with the preservation of scenic aesthetic, historic and environmental resources.

As a result of this proactive involvement, transportation projects move ahead more smoothly with fewer delays, critical resources are preserved and communities have a sense of ownership and pride in the projects.

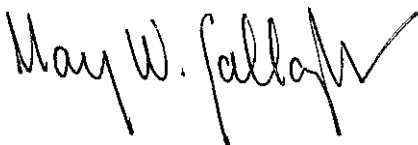
Due to the significant impact of rising fuel costs, the Rural Roads Study should also consider additional options beyond road improvements to meet future transportation needs.

Other than a brief review of the two existing transit systems in the Central Shenandoah Planning District, the Phase II report offers no analysis of alternative methods to move people and goods within the region. The dramatic increase in the cost of fuel offers the opportunity to consider innovative options to move people and goods around. A good start would be a more rigorous analysis of the interconnections among local roads and consideration of targeted transit or ride sharing to get people from home to work and back again.

Thank you for the opportunity to comment.

Please will you add CAP to your mail/email list as the primary contact for information on the Rural Long Range Transportation Plan: Kim Sandum, Executive Director, Community Alliance for Preservation, 2879 Rawley Pike, Harrisonburg, VA 22801, 540-209-2552, ksandum1@gmail.com

Sincerely,

A handwritten signature in black ink that reads "Megan W. Gallagher". The signature is written in a cursive, flowing style with a long, sweeping tail on the final letter.

Megan Gallagher  
Executive Director

cc. Kim Sandum