



September 30, 2018

Address: VA81CorridorPlan@OPI.Virginia.gov

To Mr. Ben Mannell
Study Manager
1401 East Broad Street
Richmond, VA

BY EMAIL

Thank you for the opportunity to comment on the Interstate 81 Corridor Improvement Plan (I-81 CIP). These comments are jointly offered by the Alliance for the Shenandoah Valley and the Shenandoah Valley Battlefields Foundation. Our organizations have been working together to promote sensible improvements on the I-81 corridor for nearly two decades.

Alliance for the Shenandoah Valley is a regional nonprofit, working to conserve the natural resources, cultural heritage and rural character of our region. We were formed in 2018 from a merger of four long-standing conservation groups: Rockingham's Community Alliance for Preservation, Shenandoah Forum, Shenandoah Valley Network and Augusta County Alliance.

The Shenandoah Valley Battlefields Foundation was established in 2000, pursuant to the Shenandoah Valley Battlefields National Historic District and Commission Act of 1996. The Act established the eight-county Shenandoah Valley Battlefields National Historic District as a national heritage area. Through the District's management plan, approved in 2000 by the Secretary of the Interior, Congress designated the Battlefields Foundation as the management entity for the national heritage area.

As you know well, the Shenandoah Valley is world famous for its beauty, history, and farming culture. Important economic sectors, including agriculture, tourism, and outdoor recreation, rely on these resources. Projects on I-81 have significant consequences for the Valley. Among the most important and vulnerable resources are eight Civil War Battlefields along the corridor that have been determined by the Secretary of the Interior in the Civil War Sites Advisory Commission's 1993 *Civil War Sites Advisory Commission Report on the Nation's Civil War Battlefields* to be some of the most significant battle grounds in the nation. Six of these, including Cedar Creek, straddle I-81.

In other words, we have a lot to lose if we get these transportation decisions wrong. Therefore we applaud your thoughtful approach to this study.

Overall, we are encouraged by the direction of the I-81 CIP. In contrast to previous proposals, like the Star Solutions proposal and the 2007 I-81 Corridor Improvement Study which focused almost exclusively on wholesale widening through the corridor, the current study takes a targeted approach based on identified problem areas. But, we are still concerned to see the heavy emphasis on highway expansion in the initial list of

potential improvements – approximately 58 miles of new lanes in the Staunton District alone, in addition to expansion of shoulders and on/off ramps.

We support the effort to identify targeted safety and congestion problem areas. A closer look at crash data and heat maps illuminate these areas and allow for targeted solutions that stretch scarce transportation dollars further.

In our service areas, the I-81 CIP identifies two areas that experience especially high traffic volumes and safety issues:

- between mile markers 220 and 225 in the Staunton area and
- between mile markers 296 and 302 in the Strasburg area.

We agree that these areas need attention and improvement but maintain that planning for these improvements will require creativity and particular regard for natural and cultural resources. This is particularly true for the mile marker 296 and mile marker 302 segment which is in the Cedar Creek and Belle Grove National Historical Park, on the Cedar Creek battlefield and the Cedar Creek and Belle Grove National Landmark, and buffered by lands acquired by the Battlefields Foundation and others using Land and Water Conservation Fund monies.

In addition, we support the emphasis on operational solutions. Accidents with a significant clearance time regularly occur and severely impact travelers. This not only causes problems for motorists on the interstate, it is terribly disruptive for communities and neighborhoods on US Route 11, Route 42, and other local roads where traffic is diverted. Solutions which speed the clearing of accidents will considerably improve the corridor. Similarly, enforcement of speed limit is proven to improve the safety of interstates. We support stepped up enforcement of the speed limit.

As the I-81 CIP enters phase three, we urge you to include adequate protection of the corridor's important natural and community resources as part of the prioritization process in addition to congestion, safety, and accessibility benefits relative to cost. The careful analysis of safety data in phase one and proposed solutions and funding of phase two will give important information to inform improving the function of transportation in the I-81 corridor, but they will not give the full picture. Context sensitive projects that include protection of resources valued by citizens in the corridor will be an important part of successful solutions.

Finally, we are disappointed there is not a greater emphasis on finding ways to divert freight traffic to rail. The disproportionately high volume of freight trucks using this corridor, the alarming number of crashes involving trucks, and the long accident clearance rate of freight loads point toward a need for a separation of freight from passenger cars. In the long-term, moving the long-haul truck traffic off of the interstate and onto the parallel rail line is clearly the best approach.

*John D. Hutchinson V, AICP
Director of Conservation
Shenandoah Valley Battlefields Foundation*

*Kim Sandum
Rockingham Coordinator and Transportation Lead
Alliance for the Shenandoah Valley*