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January 5, 2017

Bonnie Riedesel
Executive Director,
Central Shenandoah Planning District Commission
Sent via email to bonnie@cspdc.org

Dear Ms. Riedesel,

Thank you for the opportunity to comment on the Harrisonburg-Rockingham Metropolitan Planning Organization's Constrained Long Range Plan (CLRP) for 2040. Community Alliance for Preservation (CAP) is a citizens' group based in Rockingham County that works with the public, elected leaders and local and state government agencies to enhance Rockingham County's rural character, urban spaces and natural and cultural resources.

CAP has several concerns with the process used to develop the CLRP as well as both concerns and support for specific projects in the Vision Plan and CLRP.

Process

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Executive Director

- CAP thanks the MPO staff for revising its approval schedule for the CLRP to allow for a few more days for public input over the holidays. **We hope the MPO will in the future involve the public early in its transportation planning and provide opportunities to participate at a time and location convenient for the public.** Starting assumptions, transportation shortcomings, identified safety concerns, and sensitive historical and environmental areas can all be better identified if public participation is allowed earlier in the planning process.
- In the past, when citizens raised concerns about the excessive number of possible road projects in the Vision Plan, the Plan was described as simply a compilation of each MPO member locality's "pie-in-the-sky" wish lists of transportation projects. Perhaps that is how it is viewed by MPO officials. Unfortunately, however, outside of the MPO the Vision Plan becomes a more authoritative document, influencing the transportation sections of the City and County Comprehensive Land Use Plans and ultimately VDOT planning documents. This is particularly concerning, as there has been little meaningful evaluation or study or public input to the Vision Plan projects. In addition, members tend to politely defer to others on projects outside of their jurisdiction, so there is very little scrutiny of unnecessary or even damaging projects. CAP would like to see this circular planning dilemma reformed. At a minimum, however, **language should be added to the final CLRP document to clarify that the Vision Plan projects have not been vetted and that weight not be given to projects contained within unless further evaluation and public involvement are given.**
- As described above, localities and the MPO seek consistency among their transportation planning documents. This is reasonable, to an extent. However, the

non synchronous process of developing local comprehensive plans and MPO CLRP documents make it inevitable that some documents will be more up to date. We urge you to critically evaluate the merits of specific projects when revising the CLRP, not simply “staple” together old plans from various jurisdictions and VDOT. **Needed changes should be made in whatever document is currently being evaluated. Waiting for each jurisdiction to make its own changes provides no benefit to the public or local governments.**

CAP Supports the following projects

- I-81 safety spot improvements such as work done at interchange 247 to eliminate the merge weave pattern and guard rails to prevent crossover head-on collisions.
- Increased transportation mode options that will result from expanding network of sidewalks and bike lanes.

CAP Opposes the following projects

From the CLRP

- Project ID# 129 Switchboard section of NW Connector. CAP’s long standing opposition to the various segments of a loop road around Harrisonburg apply to this project. Much of the intended connector would eventually be built on new location through farmland in an area of the County without infrastructure to support development that follows a major road construction project. This expensive project would undermine County comprehensive plan goals to support the agriculture economy and concentrate development around towns and the City of Harrisonburg. A 4-lane divided major arterial roadway would be an extreme change to the scenic country road through cornfields and is not needed now or in the foreseeable future as there is no water or sewer infrastructure planned in Rockingham’s comprehensive plan to support future development in the area.
- Project ID # 39 connector in Dayton between Eberly and Route 11. This short segment is part of a significant string of projects that would dramatically alter Old Order Mennonite farmland and agricultural forestal districts in the Dayton area. These road projects are not supported by Dayton citizens or officials.
- Project ID# 27 Bridgewater Bypass. VDOT’s own traffic data shows that this project will make traffic worse on Dinkel Avenue and Main Street in Bridgewater. The Harrisonburg-Rockingham region cannot afford an expensive bypass that does not solve, but rather exacerbates traffic problems.

From the Vision Plan

- After 17 long years of sustained public opposition to a Harrisonburg loop road or bypass through Rockingham County’s prime farmlands and historic battlefields, it is time to **eliminate all segments (130, 129, 22B, and 26)**. The loop road is an extraordinarily expensive project that would encourage sprawl and undermine the agriculture economy, scenic and historic resources, and community identity of the area. A Harrisonburg bypass is not needed to serve the rural areas that make Rockingham Virginia’s top agricultural producer. In fact, a bypass through the county’s prime farm land would increase rural development pressure in direct conflict with the county Comprehensive Plan. Project #26, for example, is in a region that does not show growth on Rockingham County’s **2050** land use map. A Harrisonburg bypass on long-range plans hurts our region’s ability to plan for and fund the sensible road projects we really need.
- Cross Keys Battlefield is not given meaningful protection since several large-scale road **projects (26, 30, 33B, 81A/81B)** dead end into the Battlefield. The majority of Cross Keys Battlefield is not within the MPO boundary, but it is immediately adjacent and therefore deserves significant consideration to protect this

important historic resource. This lack of consideration of the Battlefield points to problems with the method for developing the Vision Plan. **One step that could help would be to include Civil War battlefields and agricultural/forestal districts on MPO maps. Conflicts between proposed road projects and these important resources would be immediately obvious.**

- The “Dayton Connector” will increase pressure on the Old Order Mennonite community and ag/forestal districts near Dayton. The small town character of the Dayton area and safety of horse and buggy traffic will irrevocably change if a major connector is built. Major new highways inevitably bring pressure for new housing subdivisions, commercial development and eventually the need for expensive public services. This, in some of the most rural and productive farmland in the county. **CAP urges elimination of segments 39, 77B, 137 and 138 which also conflict with town greenway plans and projects currently being developed.**

Other

- It appears the project description and the map label for project #43 do not match in the document.

Submitted by:

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cc: Ann Cundy, Transportation Planner, CSPDC
Rockingham Board of Supervisors