



May 9, 2018

Bonnie Riedesel  
Executive Director,  
Central Shenandoah Planning District Commission  
Sent via email to [bonnie@cspdc.org](mailto:bonnie@cspdc.org)

Dear Ms. Riedesel,

Thank you for the opportunity to comment on the **amended** Harrisonburg-Rockingham Metropolitan Planning Organization's Long Range Transportation Plan (LRTP) 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 comments on the process used to develop the LRTP as well as both concerns and support for specific projects in the Vision Plan and LRTP.

### **Process**

- CAP thanks the MPO staff for hosting a public information meeting on the amendments as well as offering a training session on the transportation model being used to evaluate projects in the Vision List. **We hope the MPO will continue these public outreach efforts to 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.
- The culling and the new ranking criteria applied to the Vision List were much needed changes to the LRTP. While developing the ranking criteria tools was necessarily technical and required expertise beyond what most of the public has, **we wish the discussions of the working group were transparent.** Google groups, conference calls, and email are more efficient ways to get work done, but they are not very transparent. The discussion of which projects to remove completely from the LRTP would have been illuminating, especially since several loop road segments have been requested to be removed from the plan for more than a decade.
- Unfortunately, the public did not participate in the development of either the Vision Plan list or the Projects for Future Consideration list. For that reason, projects with sustained public opposition continue to be included on the two lists. Including these long lists of projects allows proponents of unneeded projects to say "it's in the plan" even though the project might be poorly ranked on the Vision List or on the unevaluated Projects for Future Consideration list. The entire LRTP document, including appendices are considered authoritative, influencing the transportation sections of the City and County Comprehensive Land Use Plans and ultimately VDOT planning documents. We ask that you, please, remove these unneeded, unpopular projects from the lists. (Specific projects to be removed are named below.) If the MPO insists upon continuing to include these projects, they must clarify in the final LRTP document **that the Projects for Future Consideration in Appendix E have not been vetted and that weight should not be given to projects contained within unless further evaluation and public involvement are given.**

- We thank the MPO Policy Board for including Civil War battlefields on MPO maps **and encourage them to do the same with agricultural/forestal districts**. Conflicts between proposed road projects and these important resources would be immediately obvious.
- 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. **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 1-work done at interchange 247 to eliminate the merge weave pattern, 2- realignment of ramp at exit 245 to eliminate a dogleg intersection that leads to merging difficulties and delays at the exit traffic signal, and 3- 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# 130 and 130B, Switchboard section of NW Connector. CAP's long-standing opposition to the various segments of a loop road around Harrisonburg applies 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 four-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# 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. Scarce transportation dollars should not be spent on Preliminary Engineering of this project, which does not score well using the new ranking criteria (ranks 31 out of 36).

#### **From the Vision Plan and Projects for Future Consideration lists**

- After 18 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 (130B ranked 26th, 22A ranked 33rd, 81A ranked 32nd, 82B ranked 34th, 26, 22B, and 22C)**. 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. Project #26, for example, is in a region that does not show growth on Rockingham County's **2050** land use map. In fact, a bypass through the county's prime farm land would increase rural development

pressure in direct conflict with the county Comprehensive Plan. 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. Large scale projects that increase development pressure on Battlefield lands would be in direct conflict with Rockingham County's comprehensive plan, which includes the Cross Keys and Port Republic Historic Preservation Area. **The scale of these projects should be downgraded to match the rural character of the historic area in order to preserve it.**
- The "Dayton Connector" and the Meigs/Kaylor connection 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 is a particularly concerning prospect in some of the most rural and productive farmland in the county. **CAP urges elimination of segments 21 ranked 22<sup>nd</sup>, 39, 77B, 137, 138, 43B, and 139 ranked 19<sup>th</sup>, which also conflict with town greenway plans, planned bike/buggy lanes, and the newly adopted Dayton Comprehensive Plan.**
- Project 123 calls for a new I-81 interchange at Smithland Road. This project is at a historic working farm, and it is excessively expensive. In addition, it does not meet federal requirements for separation between interchanges on the interstate. The project should be removed from the list.

Submitted by:  
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