



December 16, 2009

The Honorable Raymond LaHood  
Secretary  
U.S. Department of Transportation  
1200 New Jersey Ave., SE  
Washington, DC 20590

**RE: Crescent Corridor Intermodal Freight Project**

SENT VIA EMAIL

Dear Secretary LaHood:

Shenandoah Valley Network and Shenandoah Valley Battlefields Foundation strongly support increased rail capacity within the I-81 corridor as a favorable alternative to excessive highway widening.

Shenandoah Valley Network (SVN) is a nonprofit program that provides support to local community groups working on land protection, land use and transportation issues in six Virginia counties: Frederick, Warren, Shenandoah, Page, Rockingham and Augusta.

The Shenandoah Valley Battlefields Foundation (SVBF) was established in 2000, pursuant to the Shenandoah Valley Battlefields National Historic District and Commission Act. The Act, passed by Congress in 1996, established the eight-county Shenandoah Valley Battlefields National Historic District in order to preserve ten battlefields in the Shenandoah Valley, including seven that are bisected by Interstate 81.

Our organizations have been engaged for many years in efforts to promote cost-effective solutions for improving I-81 that are sensitive to the historic, scenic, and environmental values of the I-81 corridor.

Despite these efforts, the Virginia Department of Transportation (VDOT) in 2007 issued a Record of Decision to widen Interstate 81 to eight or more lanes through the majority of the corridor in Virginia at a cost of \$11 billion. This highway widening project was approved despite an unprecedented level of public comment in opposition to the preferred alternative in the draft EIS. *VDOT reports that 78% of public comments favored rail alternatives to highway widening.*

The impacts of this plan on the historic, rural character of the Shenandoah Valley would be severe. The footprint of the expanded highway would take thousands of acres of prime farmland, Civil War battlefield land, and already developed lands, including

thousands of residences and businesses. Projected negative impacts on air quality, floodplains, streams, and wildlife habitat are considerable. Finally, the widening would severely diminish the distinctive rural character of the historic Shenandoah Valley.

Transporting freight by rail is a pragmatic, less costly alternative to the excessive highway widening proposed by the VDOT plan. It is not only cost-effective—it moves more freight using less gas and with lower carbon emissions.

The Shenandoah Valley’s state legislators and county supervisors, along with business groups and citizens organizations have endorsed a rail alternative as part of an approach that is less costly, more targeted to specific safety and congestion issues, and more effective at moving goods and people throughout the corridor.

This low-cost, low-impact approach for I-81, known as “Reasonable Solutions,” is below. It was endorsed by localities throughout the region, including Augusta, Rockingham, Shenandoah, Clarke, and Albemarle counties, the City of Roanoke, the towns of Front Royal, Toms Brook, New Market, Edinburg, and Mt. Jackson, and 22 civic groups. The full list of groups is enclosed.

#### **REASONABLE SOLUTIONS FOR I-81: A SIX POINT PLAN FOR THE FUTURE**

- Complete spot improvements to I-81, such as climbing lanes and redesigned exits, which will improve safety and relieve congestion. Data should support the need and type of each improvement, many of which are identified in earlier VDOT studies.
- Use the highway's median for improvements to limit the encroachment of the road on private property and to avoid further impacts on adjacent landowners, communities, farmland, battlefields and tourism.
- Significantly step up law enforcement to improve safety.
- Incorporate meaningful transit options for both urban and rural areas in road improvement plans. Coordinate with cities, local governments, major employers and universities.
- ***Pursue implementation of a rail component for a balanced transportation system that would increase options for freight capacity, maintain economic competitiveness and avoid air quality and congestion problems as road use grows.***
- Provide funding for land acquisition to mitigate impacts of I-81 on cultural resources in the corridor, most notably battlefields.

A critical component of the six-points in Reasonable Solutions is increasing rail capacity to divert freight traffic from the interstate (see the fifth point above).

We understand that the requested TIGER grant funds in Virginia are proposed to make much-needed track improvements that will increase rail’s competitiveness with long-haul trucks. We encourage such federal support while requesting that public expenditures in

Virginia and beyond be sensitive to impacts on protected lands, communities, and historic and natural features. Similarly, proper land use planning and community involvement is critical for the responsible siting of intermodal facilities.

The Crescent Corridor is an important step forward for the near future of freight rail diversion in the I-81 corridor. We look forward to working with private and public partners to continue to study rail potential and plan for additional rail expansion for the long-term.

Thank you for the opportunity to comment in support of stimulus funding for the Crescent Corridor Intermodal Freight Project in Virginia. Please do not hesitate to contact us with questions or for more information.

Sincerely,



Kate G. Wofford  
Executive Director  
Shenandoah Valley Network



W. Denman Zirkle  
Executive Director  
Shenandoah Valley Battlefields Foundation