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Shenandoah Valley Network (SVN) links community groups working on issues of land use, land protection and transportation in the six counties of Frederick, Shenandoah, Warren, Page, Rockingham and Augusta.

February 10, 2010

Public Information Office
Department of Rail and Public Transportation
600 E. Main St., Suite 2102
Richmond, VA 23219

Re: Draft Final Report: Feasibility Plan for Maximum Truck to Rail Diversion in Virginia's I-81 Corridor

SENT VIA EMAIL

Dear Sir/Madam:

Thank you for the opportunity to comment on the draft final report of the Feasibility Plan for Maximum Truck to Rail Diversion in the I-81 Corridor (Rail Diversion Study). The Shenandoah Valley Network (SVN) has long encouraged a serious analysis of the potential for and cost of substantially increased freight rail diversion, which offers a valuable alternative to costly, excessive and destructive widening of the highway.

The draft Rail Diversion Study does offer a useful compilation of existing data and planned rail improvements in the corridor. It also briefly describes additional possibilities for freight rail diversion.

However, the study fails to deliver a thorough analysis of any option beyond Norfolk Southern's Crescent Corridor improvement plans, now underway. It does not meet the mandate, unanimously adopted by the General Assembly in 2006 (HB 1581), to determine the costs and potential to divert a majority of through truck freight on I-81 from the highway to rail.

SVN strongly supports Norfolk Southern's Crescent Corridor project. In December 2009, we joined the Shenandoah Valley Battlefields Foundation in endorsing Norfolk Southern's TIGER grant application for federal stimulus funds to complete near-term upgrades to freight rail service in the I-81 corridor.

The Rail Diversion Study reports that the Crescent Corridor project alone could shift up to 750,000 trucks annually from the interstate by 2012, about 22 percent of the current number of long-haul trucks. This is a good diversion rate and, at a construction cost of \$3 billion throughout the entire multi-state project, it offers substantial savings over VDOT's

plans for an \$11 billion highway widening in Virginia. However, the focus on the Crescent Corridor project does not provide the depth of analysis mandated by the General Assembly in 2006. The draft Rail Diversion Study states that the alternatives beyond the Crescent Corridor project, labeled Strategies 2 through 5, are of “potential feasibility” or “unknown feasibility” because the study does not undertake the requisite evaluation to determine feasibility.

Determining the feasibility of all rail freight diversion strategies is precisely the comprehensive analysis our policy makers need to choose I-81 improvement options that are affordable, efficient and offer the lowest possible impact to the communities in western Virginia.

Freight rail improvements, as part of a suite of enhancements in the I-81 corridor, have wide ranging benefits that include protecting natural and historic resources, improving air quality, enhancing local economies and preserving the rural character of the Shenandoah Valley. Given the critical importance of a true analysis of the potential of rail freight diversion to remove truck traffic from I-81, the study must go further.

SVN strongly encourages DRPT to finish the important work that has been started in the Rail Diversion Study and determine the feasibility of maximum truck to rail diversion, as mandated by the General Assembly in 2006.

Again, thank you for the opportunity to comment and please contact SVN if we can provide further information.

Sincerely,

A handwritten signature in black ink that reads "Kate A. Wofford". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Kate Wofford
Executive Director