

COORDINATION AND COMMENTS

In accordance with 40 CFR 1501.7, an early and open process was implemented for determining the scope of issues to be addressed in the study and for identifying the key issues and concerns related to the study. Throughout the study, the Virginia Department of Transportation (VDOT) has coordinated extensively with local, state, and federal agencies, and conducted an inclusive public involvement program. A Notice of Intent to Prepare an Environmental Impact Statement was published by the Federal Highway Administration (FHWA) in the Federal Register on May 7, 2004 (Vol. 69 No. 89 page 25655). Local, state, and federal agencies were contacted early in the study and asked to identify issues of concern and to provide information about environmental resources within the study area. The public was notified about the study and given opportunities to provide comments about transportation needs, potential alternatives, and environmental concerns. The agency and public comments received in response to these coordination efforts were instrumental in defining the scope of the Environmental Impact Statement (EIS).

7.1 AGENCY COORDINATION

7.1.1 State Environmental Review Process

VDOT uses the State Environmental Review Process (SERP) to provide other state agencies the opportunity to comment and provide information on environmental issues at the beginning of project development. This feedback helps VDOT identify key environmental concerns within the study area and initiates coordination with the other state agencies in avoiding and minimizing adverse environmental impacts.

The following agencies were contacted during SERP:

- Virginia Department of Conservation and Recreation
- Virginia Department of Environmental Quality – Air Division
- Virginia Department of Environmental Quality – Waste Division
- Virginia Department of Environmental Quality – Water Division
- Virginia Department of Forestry
- Virginia Department of Game and Inland Fisheries
- Virginia Department of Health
- Virginia Department of Historic Resources
- Virginia Department of Mines, Minerals, and Energy
- Virginia Marine Resources Commission
- Virginia Outdoors Foundation

The following key issues were mentioned in the responses from these agencies (see table of contents and index for locations in the EIS where these issues are discussed):

- The project study area is in a faulted karst area.
- Potential presence of endangered or threatened species and their subterranean habitats within the study area.
- The presence of wetlands within the study area.
- The presence of hazardous material sites within the study area.

7.1.2 Agency Scoping Meeting

VDOT and FHWA held a formal agency scoping meeting on June 10, 2004 at the VDOT Materials Division office at Elko in Henrico County. The purpose of the meeting was to help identify substantive issues related to the study and determine the scope of issues to be addressed in the EIS. The following agencies were invited to participate:

Advisory Council on Historic Preservation
Federal Emergency Management Agency
National Marine Fisheries Service
U.S. Department of the Interior, Office of Environmental Policy and Compliance
U.S. Army Corps of Engineers
U.S. Environmental Protection Agency
U.S. Fish and Wildlife Service
U.S. Department of Agriculture, Natural Resources Conservation Service
Virginia Department of Agriculture and Consumer Services
Virginia Department of Conservation and Recreation
Virginia Department of Forestry
Virginia Department of Environmental Quality
Virginia Department of Game and Inland Fisheries
Virginia Department of Health
Virginia Department of Historic Resources
Virginia Department of Rail and Public Transportation
Virginia Marine Resources Commission
Virginia Department of Emergency Services
Virginia Outdoors Foundation
Virginia Department of Mines, Minerals, and Energy

The Virginia Department of Historic Resources (VDHR) and the Virginia Department of Conservation and Recreation's Division of Natural Heritage (VDCR-DNH) were the only agencies represented at the meeting.

The following suggestions and comments were received:

- VDHR suggested ensuring that all historic properties potentially affected by the alternatives be identified and taken into account and that VDHR's regional representative in Winchester be contacted for thoughts on which individuals or organizations might serve as consulting parties for purposes of Section 106 of the National Historic Preservation Act.
- VDCR-DNH indicated that karst features may harbor endangered species such as the Madison Cave isopod, a federally listed threatened species. Surveys may be recommended

later in the study process. VDCR-DNH also had concerns about potential stormwater discharges into sinkholes and filling of sinkholes and recommended VDOT avoid these activities and continue coordination with VDCR's Karst Program Coordinator.

The U.S. Fish and Wildlife Service, the U.S.D.A. Natural Resources Conservation Service, and the Federal Emergency Management Agency (FEMA) responded in writing to the scoping meeting invitation. Those agencies made the following suggestions and comments:

- FEMA noted the possibility that portions of the project will be within FEMA-designated 100-year floodplains, requested that the study team coordinate with the Floodplain Management Officer of Rockingham County, and noted the need to comply with Executive Order 11988, *Floodplain Management*.
- The U.S.D.A. Natural Resources Conservation Service noted the potential for losses of prime farmland and requested consideration of the presence, location, and effect on any prime farmlands, as listed in the Rockingham County Soil Survey.
- The U.S. Fish and Wildlife Service:
 - Provided a list of federally listed endangered and threatened species that occur or may occur in Rockingham County and suggested coordination with the Virginia Department of Game and Inland Fisheries and VDCR concerning endangered and threatened species.
 - Provided information concerning the Service's Mitigation Policy for potential wetland impacts. According to the Service's Mitigation Policy (FR Part III, Vol. 46, No. 15, January 23, 1981, p. 7660), wetland impacts should be avoided or minimized to the maximum extent practicable. If wetland losses are unavoidable, low-habitat-value upland sites should be used to provide compensation on a 1.5 to 1 areal basis for emergent wetlands and 2 to 1 for scrub/shrub and forested wetlands.
 - Provided information concerning Executive Order 11988, *Floodplain Management*, and recommended that mitigation of floodplain impacts follow the recommendations for wetland mitigation.
 - Requested the following information be included in each alternative:
 1. Maps showing location and acreage of all habitats to be impacted including streams, wetlands, and uplands.
 2. Maps showing impacts within the 100-year floodplain.
 3. Sequence and timing of project construction.
 - Suggested that information be included on the potential indirect and cumulative impacts to upland and wetland habitat types predicted to result from each project alternative and the anticipated acreage to be impacted.
 - Suggested consideration of potential impacts to forested habitat in the study area and recommended that some type of restoration/enhancement of forested habitat be implemented to offset such impacts (e.g., riparian or floodplain reforestation).

7.1.3 Letters to Agencies and Organizations

Letters requesting information and comments for use in the study were sent to the following agencies and organizations (those denoted with an asterisk responded):

- * Harrisonburg City Manager
- * Harrisonburg Department of Planning and Community Development
- * Harrisonburg Department of Parks and Recreation
- Harrisonburg Public Works Department
- * Harrisonburg Economic Development Department
- * Harrisonburg Department of Transportation
- * Harrisonburg City Public Schools
- Harrisonburg/Rockingham Social Services District
- * Harrisonburg/Rockingham Joint Local Emergency Planning Coordinator (LEPC)
- Rockingham County Administrator
- Rockingham County Planning and Community Development Department
- Rockingham County Recreation and Facilities Department
- Rockingham County Public Works Department
- Rockingham County Health Department
- * Rockingham County Public Schools
- * Bridgewater Town Manager
- Dayton Town Manager
- Mount Crawford Zoning Administrator
- Central Shenandoah Planning District Commission
- * Virginia Department of Forestry
- * Virginia Department of Conservation and Recreation, Karst Protection Coordinator
- * Shenandoah Valley Battlefields Foundation
- Harrisonburg-Rockingham Historical Society

In their responses, these agencies mentioned the following key issues:

- The karst terrain and subterranean habitat of the Madison Cave isopod and Madison Cave amphipod.
- Emergency response delays during construction.
- Potential loss of prime farmlands.
- Access from any new connector road to Harrisonburg.
- Bike facilities.
- Level of access control to be imposed.
- Accommodating travel needs arising from continuing population growth and development.
- Minimizing impacts to Cross Keys Battlefield.

7.1.4 Agency Partnering

VDOT and FHWA use an agency coordination process referred to as “Partnering,” which provides the U.S. Army Corps of Engineers, the U.S. Fish and Wildlife Service, and the U.S. Environmental Protection Agency multiple opportunities to participate in studies of complex transportation projects, beginning in the earliest stages of project development. During this study, there have been three partnering meetings as outlined below. In addition, preliminary drafts of chapters of this EIS were provided to the agencies for review and comment.

November 21, 2003 Meeting. The agencies were informed of the study and that the scoping process would begin in the near future. The discussion included the following:

- Purpose of the study.
- The relationship with the I-81 Corridor Improvement Study.
- Logical termini for alternatives.
- Potential use of existing highway corridors.

April 5, 2005 Meeting. The agencies received the results of the scoping process and a draft purpose and need memorandum. The following issues were discussed during the meeting:

- Forecasted travel patterns and capacity deficiencies.
- Types of access control.
- Potential impacts to migratory bird habitat and karst features.
- Protection of Cross Keys Battlefield.
- Preliminary conceptual alternatives.

May 5, 2005 Meeting. The agencies were presented with the conceptual alternatives, the screening process that was being used to identify Candidate Build Alternatives (CBAs) to carry forward into the Draft EIS, and VDOT's preliminary conclusions on these alternatives. Preliminary traffic numbers and impacts were provided for the proposed CBAs. The following issues also were discussed during the meeting:

- Stream crossings (parallel versus perpendicular crossings).
- The use of planning and design corridors (i.e., a wide generalized planning corridor and a narrower, more realistic design, or "footprint," corridor to estimate environmental impacts, see Section 4.1 of Chapter 4, Environmental Consequences).
- Endangered species issues within study area.

7.1.5 Metropolitan Planning Organization Coordination

The Harrisonburg-Rockingham Metropolitan Planning Organization (HRMPO) was developing its *2030 Transportation Plan* during the same time as this location study process. Coordination with HRMPO's director and HRMPO's consultant was conducted during the study to ensure consistency of traffic modeling and alternative development issues.

7.1.6 Other Agency Coordination

Several of the agencies listed in preceding sections were consulted throughout the environmental review process. For example, VDOT met with City of Harrisonburg and Rockingham County officials on several occasions to gather additional information about specific locations, to review alternatives, to review local plans and policies, and to discuss specific technical issues. A presentation was made to the Rockingham County Board of Supervisors to review alternatives and preliminary study findings. Other local agencies were consulted to obtain technical information, GIS mapping and databases, or details about facilities and services within the study area. These agencies include the City of Harrisonburg, Rockingham County, the Virginia Department of Conservation and Recreation, and the Shenandoah Valley Battlefields Foundation. Additional input was received from the U.S. Fish and Wildlife Service indicating that no impacts were expected on federally listed endangered or threatened species. Detailed reports and data regarding historic properties were submitted to the Virginia Department of Historic Resources for review and concurrence on National Register of Historic Places eligibility determinations.

7.2 PUBLIC INVOLVEMENT

7.2.1 Public Scoping Meeting

VDOT held a Public Scoping Meeting on July 22, 2004 to obtain citizen input for use in defining the scope of the study. At the meeting, the study team presented maps and displays describing the location study process, environmental constraints, and other study information. Key issues revealed by comments submitted by citizens included:

- The need to accommodate east west travel movements.
- Concern for historic properties, farmlands, scenic attributes, water resources, and air quality.
- Considerable anti-growth sentiment exists; with many comments reflecting a fear that new roadway construction would induce or speed development.
- Substantial support exists for improving existing roads.

7.2.2 Citizen Information Meeting

As a follow-up to the Public Scoping Meeting, VDOT held a Citizen Information Meeting on March 24, 2005 to solicit public input on transportation needs identified and a range of conceptual alternatives to meet those needs. The comments generally confirmed the principal elements of purpose and need that the study had identified, but also reflected an opinion that these needs not be met with an alternative that would have excessive impacts to the human and natural environments. Also, the comments indicated continued and strong support for the improvement of existing roads. There was general opposition to any alternative that would take too much farmland, destroy historic properties, or not address the transportation problems.

7.2.3 Input from Interest Groups

Several interest groups, community organizations, and individual property owners provided additional input through meetings, telephone conversations, or other correspondence with study team representatives. Topics of discussion included potential alternatives, the environmental review process, and specific questions about the study and potential environmental impacts. These groups included:

- Shenandoah Valley Battlefields Foundation (principal concern - potential effects on Cross Keys Battlefield).
- Civil War Trails (principal concern - potential effects on Cross Keys Battlefield).
- Massanetta Springs Camp and Conference Center (principal concerns - potential effects on Massanetta Springs property, a Presbyterian-affiliated retreat and conference center, portions of which have been determined eligible for the National Register of Historic Places.
- Community Alliance for Preservation (principal concerns – potential impacts to rural community, historic properties, the viewshed of the Shenandoah National Park, and potential for urban sprawl).

7.3 OTHER COORDINATION EFFORTS

This Draft EIS is being made available to the public for review and comment and distributed to agencies and individuals with jurisdiction, expertise, or interest in the issues involved in the study. This document will be available for review at the Location Public Hearing. All substantive review comments received on the Draft EIS or at the Hearing will be considered during preparation of the Final EIS and in reaching a decision on the study.