

**ROANOKE APPALACHIAN TRAIL CLUB  
POST OFFICE BOX 12282  
ROANOKE, VIRGINIA 24024**

MEMBER APPALACHIAN TRAIL CONFERENCE

Mr. Earl T. Robb  
State Environmental Administrator  
Virginia Department of Transportation  
1201 East Broad Street  
Richmond, Virginia 23219

January 10, 2001

Dear Mr. Robb:

As president of the Roanoke Appalachian Trail Club, I have been involved in a number of presentations, meetings and discussions involving Interstate 73. In particular, I have familiarized myself with the Draft Environmental Impact Statement as it relates to the Appalachian Trail in Options 1 and 1A. Most of the pertinent material can be found in Sections 3.5, 4.4, 4.5 and 4.13 of the Location Study.

In addition to our stewardship of the physical trail, this club (and every maintaining club from Maine to Georgia) is also charged with protecting what we call the "Appalachian Trail Experience". This can be thought of as the cumulative result of interacting with wild, scenic, pastoral, cultural and natural elements provided by the trail while being unimpeded by competing sights or sounds to the greatest extent possible.

As far as scenic values are concerned, the highway, as envisioned in either Option 1 or 1A, would be visible from the Appalachian Trail at a number of points between Route 11 and Fulhardt Knob. While it is true that I-81 is also visible from certain points along the trail, this should not be taken to mean that the degradation of the Trail Experience by I-81 should somehow mask that of I-73. Rather, the existence of two interstates in the same general area would simply compound the problem.

Our objection to your approach to noise impact is similar: the traffic sounds from I-73 would impact parts of the Appalachian Trail in the Fulhardt Knob area which are currently unaffected. Where I-81 is also a factor, the distractive noise level would be exacerbated. We believe that any deviation from natural quiet degrades the Trail Experience.

In summary, we cannot accept the thrust of your conclusion in Subsection 4.13.3.3 which suggests that the effect of Option 1 or 1A on the Appalachian Trail would be minimal. In order to discuss these issues more fully in advance of the Final Environmental Impact Statement, an on-site meeting with members of your department would appear to be useful. I would suggest inviting representatives from each of the following organizations: the Appalachian National Scenic Trail, the Appalachian Trail Conference, the Blue Ridge Parkway, the Jefferson and George Washington National Forests, and the Roanoke Appalachian Trail Club.

**Response:** *The Draft EIS did identify the Appalachian Trail as a special visual concern area. It was noted that Segment 372 would enter the visual experience of the southbound Appalachian Trail hiker at the Fullhardt Knob Shelter, in the middleground distance, as the segment moves east of Coyner Mountain and aligns to cross the BRP in the Mountain Pass Road area. Project Team members took photos along the portion of the Appalachian Trail from Fulhardt's Knob to U.S. Route 220 during summer*

*when foliage was heavy and during winter when foliage was non-existent. Segment 372 would be potentially visible to trail hikers for the three-mile (five-kilometer) hike from Fullhardt's Knob Shelter to U.S. Route 11. Toward the top of Tinker Mountain, another two miles (three kilometers) would be exposed to background views and displace farmland scenes, which are the primary subject of view from this part of the Appalachian Trail. These views are often currently impeded however, by trees and foliage that line the trail.*

*The Appalachian Trail was also evaluated as an Activity Category A for noise impacts at three different locations. Activity Category A represents lands on which serenity and quiet are of extraordinary significance and serve an important public need, and where the preservation of those qualities is essential if the area is to continue to serve its intended purposes. The FHWA Noise Abatement Criteria applicable to Activity Category "A" sites is 57 dBA Leq (1 hour). There is no other activity category with a lower dB(A) threshold available to FHWA in regulation. To establish a new one would be arbitrary and capricious. Existing ambient noise levels were recorded along the trail at the three sites as being 45, 47 and 46 decibels. The noise impact analysis using STAMINA 2.0 determined that the noise levels at these three sites under the future no-build condition would be 49, 47, and 46 decibels, respectively. Under the future build condition, the future noise build levels will be 51, 47, and 47 decibels, respectively. Under normal environmental conditions, a 3 decibel increase is barely perceptible to the human ear. Therefore, the only site that would be of concern is the site where existing noise levels of 45 decibels would increase to 51 decibels under the build scenario (even though this noise level only represents a 2 decibel increase over the future no-build noise level). However, as documented in the draft EIS, "noise from I-73 would dissipate to ambient or existing levels [since it is located over 3,000 feet away] and not represent an impact to the Appalachian Trail under [federal] regulations. Instead, noise levels at the Trail will continue to be dominated by existing traffic from I-81."*

*Since the circulation of the DEIS, the CTB has approved a location corridor that would utilize existing I-581 and U.S. Route 220, instead of Segment 372 east of the City. We appreciate your willingness to work with us but it appears that will not be necessary given the CTB decision.*

I look forward to hearing from you.

Very truly yours,

Richard L. Clark  
President RATC

cc:

Don Owen - Appalachian National Scenic Trail

Mike Dawson - Appalachian Trail Conference

Gary Johnson - Blue Ridge Parkway

Ken Landgraf- Jefferson and George Washington National Forests

Roanoke ATC  
P.O. Box 12282  
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## **I-73 Location Study Comments**

I would like to raise several issues and questions regarding I-73:

- (1) I question the underlying assumption that the economic prospects of the Roanoke area are poor. Compared to what or where? I have seen an awful lot of development in the area in the last 10 years. What is our goal? More development than we already have? The fact that a larger city like Winston/Salem is modeling its downtown revitalization plan on the success that Roanoke has had should tell us something. It tells us that economic development should start with maintaining what we already have. It should also tell us that prosperity doesn't necessarily come along with being on at least one major highway.

**Response:** *The DEIS does not assume that the economic prospects of the Roanoke area are poor. As documented in Table 1.4-1 of the draft EIS, the City of Roanoke experienced a 4.4% growth in employment in the five years leading up to the draft EIS. It is further stated in the purpose and need (page 1-5 section 1.2 number 2) that " Provisions for economic growth, economic vitality and maintenance of existing economic competitiveness in the corridor" are collectively a second I-73 purpose. Therefore, the selected alternative will be designed to connect economic centers and improve access to them, not by-pass them.*

*In March of 1994, after VDOT completed a feasibility study to determine the general location of Interstate 73 in the state, the Commonwealth Transportation Board selected a proposed location for the I-73 corridor that entered Virginia from West Virginia on Route 460 west of Narrows, and which generally followed Routes 460 and 220 to the North Carolina State line. However, in late 1994, the cities of Roanoke and Salem and the County of Roanoke expressed a desire that the location of I-73 be improved by routing it along I-581 and I-81 because they saw its benefit as a tool to facilitate economic development. In December of 1994, VDOT prepared a supplemental report for I-73 that determined it feasible to refine the location of I-73 using I-581 and I-81. The CTB approved the revised location and with the passage of the NHS Designation Act of 1995, Congress included the CTB-approved corridor for Interstate 73 in legislation which was the impetus for the draft EIS*

- (2) Projects like I-64 from Sam Black Church to the intersection with I-77 or the Coalfields expressway brought an Interstate to areas where there was no interstate. For Roanoke, this is not the case. Please explain why Roanoke's transportation system with a major interstate, several dual lane highways, a major airport, and a rail system second to none - is not an adequate transportation system.

**Response:** *The purpose and need for the I-73 project is not to improve the transportation system in the City of Roanoke. The purpose and need for Interstate 73 is stated in Section 1.2 of the document. There, it is stated that I-73 project is intended to: 1) provide safety improvements along the U.S. Route 220 study area, 2) support economic development both locally and regionally, 3) improve access and capacity, 4) enhance mobility, and 5) address the Congressional intent to establish I-73 as a high priority highway to link the nation's regions and support economic growth. Several of these objectives are accomplished with an alternative through the Roanoke area. The context of the project relative to Roanoke needs to be maintained. The proposed project covered by this study is over 70 miles in length*

and approximately 9 miles of it lie in the City of Roanoke. This context is further refined when one takes into account the length of the project in Roanoke relative the entire length of I-73 located in Virginia. Finally, this context is refined still further when one considers the length of the project in Roanoke relative to the entire I-73 high priority corridor designated by Congress, which stretches from Michigan to South Carolina. Therefore, the purpose and need wasn't defined just to address the City of Roanoke but the entire study area.

- (3) Please quantify the displacement of economic benefits that will result from I-73 bypassing areas along secondary highways such as 220, 460, & 311. Much of what is being included as "economic growth" is really displacement of economic benefit from one place to another. Some of the areas along the old Route 60 in West Virginia that was replaced by Route 64 are perfect examples.

**Response:** *The economic effects expected from the Build option include a trade off between the loss of fewer existing businesses with the proximity of a proposed option to existing and planned industrial and commercial growth areas. The build option is expected to improve travel times and provide enhanced access to industrial and commercial areas within the study area.*

*A straw man comment often received on projects that bypass towns or business districts is that the project will destroy the economic base of the downtown area or business district by diverting through-traffic away from those areas. In anticipation of this comment, a NCHRP study was cited in the EIS to illustrate the amount of scientific research that has been done in this area and the potential positive economic impacts associated with the construction of a highway in a rural environment. While the study focused on population centers smaller than those found in the I-73 corridor, the results found that the construction of these highways did not, generally speaking, have a negative impact on the economy of those areas bypassed or had a very limited impact. The study "summarized" economic survey results from 47 state DOT's and six Canadian DOT's as well as the published results of 190 research articles in arriving at its conclusion.*

- (4) The assumption that 220 is less safe than the proposed I-73 is debatable. Perhaps by accidents per vehicle mile traveled this is statistically true. But it appears to me that this statistic is skewed by the number of vehicles and number of miles traveled on the interstates being much higher than a road like 220. I have traveled both 220 and I-81 many, many times. I-81 strikes me as significantly more dangerous. Either way, highways, whether interstates or dual lane secondary roads, result in accidents and death. To say that I-73 will be "safe" is highly debatable.

**Response:** *"Safe" is used in the context of accidents per vehicle mile traveled, which is a standard measurement of safety for roadways. A detailed investigation of accident rates was conducted as part of the preparation of the DEIS and in subsequent analysis and investigations for both US 220 and I-81. Across the State, accident rates for four-lane divided roadways without access control, such as US 220, have accident rates that are generally twice the amount as compared to four and six-lane controlled access facilities, such as the proposed I-73. Accident rates are determined using the number of vehicles traveling along a roadway to identify crash rates comparable between different facilities regardless of the amount of vehicles using the roadway and length of the roadway.*

*A detailed comparison of accidents and accident rates was conducted in response to the question for I-81 and US 220 for the year 1995. Using DEIS referenced VDOT information for the referenced year, 253 accidents and five (5) fatalities occurred along US 220 from the Roanoke county line south to the North Carolina State Line (approximately 58 miles). Interstate 81 experienced 1635 accidents and 20 fatalities during the same period along the entire length of roadway in Virginia (approximately 325 miles). Accident rates based on these numbers and daily traffic volumes are around 65 accidents per million*

vehicle miles (Acc/MVM) along US 220 and 41 Acc/MVM northbound and 46 Acc/MVM southbound along I-81. Thus, the overall accident rates on I-81 are almost 1/3 less than the corresponding accident rates on U.S. 220. While the number of fatalities is four times as great on I-81 as compared to U.S. 220, the roadway length of I-81 is more than six times greater indicating less fatal accidents occur per mile along I-81 than U.S. 220. In addition, as detailed in the purpose and need section of the DEIS, some sections of US 220 experience considerably higher accident rates than this average. This would also indicate that an interstate type facility would be safer to travel on as compared to sections of US 220. The comment on the interstate highway being safer was made in regards to these issues and with regard to the overall State highway statistics.

- (5) There is no question that building I-73 will be expensive (over \$1 billion for just the Virginia section and \$20 to \$50 billion for the national highway). The money could be better spent. After all, it is our tax money!
- (6) I have read that there are over 3,000 bridges in the state of Virginia alone that need repair. Schools need to be renovated. Roads need to be improved. Water and wastewater infrastructures need to be repaired. Everyone wants new projects. But for every new project, there are long term operation and maintenance costs. Given that our society is having trouble keeping up with the operation and maintenance of our existing infrastructure, does it make sense to just build more and more new structures? I suggest that we focus on maintaining the infrastructure that we do have. We have raw sewage going into creeks and rivers because we do not have the money (in the range of hundreds of thousands or millions as opposed to billions) to upgrade and prevent combined sewer overflows. And yet we have billions for new highways. What does this say about our priorities?

**Response:** *VDOT maintains the third largest transportation network in the United States with 57,712 miles of roadway. Approximately 37% of VDOT's annual \$4+ billion budget is dedicated to maintenance of existing facilities. Major roadway network deficiencies, maintenance and operational improvements in Virginia are addressed in the VDOT six-year improvement program. Routine operational and maintenance items are also addressed in the annual budget. However, Virginia must not only maintain their existing infrastructure, they must also plan for and address anticipated growth.*

*VDOT currently maintains 11,855 bridges in the state. 1,321 are rated structurally deficient, while 2,446 are rated functionally obsolete. Structurally deficient implies replacement is needed. Functionally obsolete refers to standards or capacity and not the structural integrity of the bridge. For example an otherwise structurally sound bridge may have no shoulders, which, by today's standards would render it functionally obsolete. Using federal standards for federally eligible structures, VDOT structural deficiencies are less than the national average.*

*While needs exist all over, whether they be school-related or water/waste water-related, money set-aside for transportation cannot merely be shifted to non-transportation uses. The decision on Interstate 73 rests with the Commonwealth Transportation Board, a board of elected officials appointed by the Governor. If they choose a new location alternative, they will do so with full knowledge of the cost. Likewise, the overall budget for VDOT is set by elected officials through the General Assembly. The amount of money to be spent on transportation each year is a decision that they make while weighing needs elsewhere in the state. It is these elected officials that establish Virginia's priorities as well as Virginia's transportation priorities. The EIS developed pursuant to NEPA is intended to be a document that allows these decision makers to make an informed decision. In contrast, NEPA does not force decision makers to make a particular decision such as the least expensive or least environmentally damaging alternative. The full success of I-73 as a high priority corridor will depend not only on decisions made in Virginia but also on decisions made in every other state effected by I-73 as well as decisions made by the U.S. Congress.*

- (6) With the supply of fossil fuel diminishing and the price of fuel increasing, I believe it is a questionable economic decision to invest our money in more highways.

**Response:** *As stated in the DEIS, page 4.1-12 section 4.1.9 Travel Time Analysis, the inclusion of I-73 in the interstate highway network could produce significant travel time savings for interstate highway trips originating in Roanoke and Martinsville, and for those trips passing through the study area. Therefore, it can logically be assumed that a reduction of travel time will result in the reduction of fuel consumption.*

*A review of Internet literature regarding oil reserves reveals a wide range of opinions regarding future oil supplies. Recent scientific evidence (within the last five years) referenced on the Internet is optimistic about the world's oil reserves bringing into question earlier doomsday predictions. For example, for the last 100 years, the U.S. Geological Survey has consistently reported that America had only about 10 years worth of oil left. Not all known oil reserves can be extracted economically but economists recognize that if oil prices do increase, those higher prices can then make it profitable to expand production into areas where it is not currently cost-effective to tap known reserves. Although we have experienced record levels in gas prices, history has shown that these price spikes are cyclical and demand driven.*

- (7) The conclusion that I-73 will actually reduce air pollution is weakly supported, if at all, and is contrary to common sense.

**Response:** *The amount of air pollution emitted from mobile sources is a function of several factors including traffic volume, vehicle mix, average speed, VMT, and distance traveled. Section 4.1 of the DEIS states that the construction of I-73 will result in a reduction of the Vehicle Hours Traveled (VHT) and Vehicle Miles Traveled (VMT) when compared to the existing roadway network. Therefore, based on VHT and VMT, the construction of I-73 will result in a reduction of pollution from mobile sources. In addition, generally speaking (without going into detail about EPA's speed-emission curves upon which emissions modeling is based), congested travel conditions produce more emissions than free-flowing conditions when a vehicles engine burns fuel more efficiently. As average speed increases (which is expected with an Interstate facility), emissions decrease. For example, between idling and 55 mph, the emissions produced by a vehicle drop off significantly before bottoming out and gradually increasing. Even though emissions begin to gradually increase above 55 mph, they are still less than the emissions produced at 45mph, 35 mph, 25 mph, etc. Therefore, the conclusion is not contrary to common sense.*

- (8) The quality of life in the Roanoke Valley is our best economic aspect. No, I cannot economically quantify the quality of life. But I can tell you this, many people like me would not trade our quality of life for any amount of money.

**Response:** *Comment noted.*

- (9) We saw a severe water shortage in 1998 and 1999. How can we support more development without more water? What happens the next time the City of Roanoke has a severe water shortage? The cost of Roanoke County's Spring Hollow reservoir was certainly less than I-73 by hundreds of millions of dollars.

The City of Roanoke's wastewater treatment plant has recently been upgraded but is still having trouble handling the wastewater load that it is presently treating and discharging to the Roanoke River. The Roanoke River is a polluted and troubled waterway. It is also of limited size.

Ignoring the real limiting factors of water and wastewater treatment is not smart.

**Response:** *The City of Roanoke and the County of Roanoke have partnered to help the City with water in times of shortages. The City of Roanoke is also trying to get a waiver from the State of Virginia to reopen the Crystal Spring treatment plant. The plant was closed because the state had enacted stricter standards and it required that Crystal Spring close down until the higher standards could be met. Both governments are also exploring alternate options for water supply such as a regional water authority.*

*Your comment on the relationship between development and water is a relationship alluded to in the DEIS. The DEIS acknowledges that the construction of I-73 does not guarantee economic development, it just increases the economic development potential. An improved transportation system is a tool to be used by local governments to foster economic development, but it is just one of many factors that will the location, timing, and intensity of development. Among the other factors effecting development cited in the DEIS is whether there is access to sewer and water. Therefore, we agree that water and sewer issues are issues that can effect economic development potential and they are issues that need to be considered by localities because of it.*

(10) People talk a lot about property rights. And yet, construction of I-73 will see many people's homes and farms taken from them by eminent domain laws. I fail to understand why it is acceptable to take people's property, particularly when the planned use is not proven to be in the public's interest. In one situation in the state of Texas, people's land was taken for the public project of building a shopping mall. This should not be allowed. Taking land to improve the prospects of some businesses at the expense of agrarian business, neighborhoods, the environment, and tourism potential may prove a net loss to the public good.

True capitalism would react to the decreasing supply of open land and come into balance with the population of the country, instead of forcing more and more public projects down people's throats. It must be particularly galling to know that your own tax money (including local personal property and real estate taxes) are going for a project that will take your own property (or worse yet, put an interstate highway close enough to your property to lower your property value without actually being bought out, leaving you with negative economic and aesthetic impacts).

**Response:** *Comment noted. It is pointed out that many highway projects do not originate with VDOT but originate with elected officials or through a local planning process. Concerned citizens need to be more involved in their local governments and their planning processes to address many of the concerns that you raise.*

(11) The environmental impacts of constructing I-73 are undeniable. It is easy to separate out each river crossing and say that the impact is minimal. But the overall impact on our area's streams and rivers of massive erosion and degradation of water quality in the big picture is a severe problem. There is no doubt in my mind that cleaning up the Roanoke River would be more economically beneficial in the long run. No, I cannot quantify the positive economic benefit. I can tell you this, taking water quality for granted is a formula for failure.

**Response:** *Erosion and sediment control measures and stormwater management measures that will be implemented during construction are discussed in Chapter 4 of the DEIS. Specific performance standards that will be applied to the project are set forth in the Virginia Sediment and Erosion Control Handbook, which is referenced in these sections of the DEIS. Project-specific erosion and sediment control measures are developed as part of erosion and sediment control plans, which comprise a mandatory component of all VDOT roadway construction documents. Erosion and sediment control measures to be implemented during operation and maintenance of the selected alternative will be*

*covered under VDOT's annual projects maintenance program for each of the counties affected. With implementation and proper management of appropriate mitigation measures and best management practices, none of the alternatives are expected to result in a permanent degradation of water quality.*

- (12) Suppose we build I-73. What then? Will this be enough? Will we have enough transportation options to ensure a strong economy? Or will we just need to build more public projects to keep the dollars flowing? When I-73 is finished, will we then say that Roanoke needs a third major interstate?
- (13) People are fond of saying that they are in favor of capitalism, a free market economy, and states' rights. If this is so, why do we keep relying on federal tax money to fund roads and airports? If we want states' rights, local autonomy, and lower federal taxes - don't we have to sacrifice some federal money?

**Response:** *These comments/questions are more appropriately directed toward elected officials. When it comes to federal transportation dollars, the money that each state receives under the Federal-aid highway program represents a share of the federal taxes that are paid every time a gallon of gas is purchased. Further, when Congress sets aside "demonstration funds" for a particular project, it is usually a result of efforts at the local level, not the state level.*

- (14) Suppose we took the billion dollars for I-73 and built a rail system. I guarantee you that for a billion dollars, I can build you an excellent rail system that will bring more economic opportunities, use less energy, be a longer term solution, save lives, and cost less tax dollars. Please explain to me why a rail system is not preferable.

**Response:** *Please provide documentation supporting your statement because it goes against the experience of other rail projects. Generally speaking, population density in the project corridor and ridership would not justify or support a rail system.*

- (15) What about the western end of I-73? Will it go along the existing route 460? If it doesn't follow 460, it will plow through national forest, Mountain Lake, and areas that are extremely mountainous. The area north of the New River is one of our nation's least developed and most productive agricultural and outdoors areas. Or will I-73 wind down I-77, up 81 and then down 220 back towards I-40 and I-77? These questions should really be answered before we make this decision. The New River already has Route 460, railroad tracks on either side, the Radford Arsenal, and the Celanese Plant. At some point, industrial development and preservation of our agricultural and wilderness areas become incompatible and counterproductive.

**Response:** *This document only evaluates the location of I-73 from the Virginia-North Carolina state line to I-81 in the vicinity of Roanoke. A separate study to determine the location of I-73 from I-81 to the West Virginia State line will be conducted at a future date when funding becomes available. Notwithstanding, Congress identified the study area for Interstate 73 from its terminus with Interstate 81 in the vicinity of Roanoke as generally following "I-81 to the proposed "smart highway" in the vicinity of Ironto. The study area follows the "smart highway" to U.S. Route 460 in the vicinity of Blacksburg and continues along U.S. Route 460 to the West Virginia state line."*

- (16) The economic assumptions and eminent domain laws do not take into account the agricultural community. The agricultural community does not have a lot of political power or cash flow. I think the way family run farmers get treated in our economy is awful. How will we feed an ever-growing population, when we keep paving over farmland?

**Response:** *Comment noted. The DEIS addressed the economic impact of the project on agriculture. Although the amount of farmland has been decreasing nationally, the agricultural community has continued to address the needs of a growing population.*

In conclusion, it is clear that as a private citizen, I favor the "no build" option for I-73. Improvement of 220 and I-81 may be reasonable and certainly more cost effective. At least the Coal Fields Expressway will serve an area where there is no existing interstate highway. We already have the smart road and various road improvement projects plus millions of federal money for the airport and other development projects. Roanoke is one of the greatest places on earth. Creating more cash flow (if this happens at all) will not make Roanoke better. Relying on federal tax money for economic development is not being independent. I fail to understand how some of us can state that we are for states' rights, independence, freedom from the federal government, freedom from taxes, and property rights - and then turn around and support federal projects that affect our property rights. To me, this is contradictory. I do agree that taxes should be reduced. But it appears to me that what will happen is that taxes will be cut, while keeping billions of dollars for projects like I-73. The result is that something will have to give resulting in deep cuts in educational and environmental programs.

Building this highway will only make Roanoke more like other places that many of us have purposefully left behind (Northern Virginia, Charlotte, New York City, etc.). I suggest that we should have the courage to invest in a different, more interesting future.

Sincerely,

Dawna Clephas



**Coopers Cove Community Club  
3095 Cooper's Cove Road  
Hardy, VA 24101**

January 9, 2001

Mr. Earl T. Robb  
State Environmental Administration  
Virginia Department of Transportation  
1201 East Broad Street  
Richmond, VA 23219

Dear Mr. Robb:

Coopers Cove Community Club, a civic organization representing the greater Cooper's Cove community in Franklin and Roanoke Counties, submits the following comments in response to the Draft Environmental Impact Statement for I-73. We, the club officers, sign this document full support from our membership after a nearly unanimous vote.

Our rural community was founded in the late 18<sup>th</sup> century. Many descendents of the original pioneer families still reside in Cooper's Cove alongside newer residents who have moved here to enjoy the beauty and high quality of life. Our community is well defined, encompassing an area bordered by Back Creek, the Roanoke River, and the top ridge of Lynville Mountain. I-73 threatens our heritage, our environment, our property, and our way of life.

We are opposed to any I-73 construction involving segments 372 or 287a. These segments are part of options 1, 1a and 2a which bisect Cooper's Cove. There are several issues involving these routes that were not addressed in the DEIS. We are also opposed to any new construction for I-73 and support the TSM option as the most fiscally and socially responsible choice.

Many important issues regarding impacts of segments 372 and 287a should be brought to your attention.

1. The DEIS fails to recognize the historical significance of the Cooper's Cove community and its potential eligibility as a rural historic district under criteria A, B, C, and D of National Register Bulletin 30.

Many community members assisted with a thorough independent survey of the community during the summer and fall of 2000. Conducted by historic preservation consultant Harold R. Reem, the study concluded that a 3,200-acre segment of Cooper's Cove is potentially eligible as a rural historic district. I-73 study segments 372 and 287a bisect the potential district. Construction of either segment would violate section 303(c) (former Section 4[f]) of the Department of Transportation Act and have a devastatingly adverse impact on the historic integrity of our 220 year-old community.

Please see the attached copy of the draft report that documents 153 contributing historic resources and explains why Coopers Cove is eligible as an historic district under multiple criteria.

**Response:** *Mr. Reem contended that Cooper's Cove was potentially eligible for the National Register of Historic Places as a rural historic district under Criteria A, B, C, and D and that the applicable "single 2-century-long unifying context is the Settlement and Development of a Continually Evolving Blue Ridge and Piedmont Agricultural Community (ca. 1770-1951). "*

*Local histories do not support his claim. Coopers Cove does not have a strongly documented history, either in local histories or in historic gazetteers. John and Emily Salmon's highly regarded Franklin County, Virginia, 1786-1986 does not mention Cooper's Cove or the Atkins, Bandy, Cooper, Horn, Patsel, Prather/Prater, or Richardson families/family members in relation to Cooper's Cove. Nor do the more community-oriented publications Bicentennial Reflections: County of Franklin- 1786-1986, Franklin County: Life and Culture, or Franklin County, 1785-1979: Yesterday and Today mention the community or the seven families listed above.*

*Early gazetteers suggest the existence of a community called Coopers or Cooper's Cove, which apparently faded by the late 19<sup>th</sup> century. Martin's 1836 gazetteer mentions a post office at "Coopers" in Franklin County; no other information is given. Boyd's Virginia State Business Directory, 1871-72, mentions a "Cooper's" post office in Franklin County, one of 15 at the time. None of the late 19<sup>th</sup>/early 20<sup>th</sup> century gazetteers, however, mentions the area:*

- *Chataigne's Virginia Gazetteer, 1884-85 has approximately 5 pages of listings for Franklin County, including 42 POs, and 28 farming communities. There is no mention of Coopers/Coopers Cove.*
- *Chataigne's Virginia Gazetteer, 1893-94 has 12-1/2 pages of information on Franklin County, and lists 53 post offices and 41 farming communities. There is no mention of Coopers/Coopers Cove.*
- *Hill's Virginia State Gazetteer and Business Directory, 1897-'98 contains 6-1/2 pages on Franklin County, including 65 post offices and 50 farming communities. There is no mention of Coopers/Coopers Cove.*
- *Hill's Business Directory and Gazetteer, 1917 contains 8 pages on Franklin County, including businesses such as dairies and livestock dealers. There is no mention of Coopers/Coopers Cove.*

*Given the limited amount of information about Cooper's Cove in standard sources, developing a context was more of a challenge than is typical for a rural historic district. Cooper's Cove would not be eligible under Criterion B; also, the cumulative contributions of a family or the continuing operation of a farm over several generations did not qualify the property under Criterion A. (National Register Bulletin 15:15) More importantly, the Virginia Department of Historic Resources has recognized a large number of well-defined contexts, but not the all-encompassing one that Mr. Reem created.*

*National Register Bulletin 30 provides guidance on significance for agriculture. "Eligibility for significance in agriculture on a local level depends on several factors. First, the characteristics must have served or resulted from an important event, act, or theme in agriculture development as recognized by the historic contexts for the area. Second, the property must have had a direct involvement in the significant events or activities by contributing to the area's economy, productivity, or identity as an agricultural community. Third, through historic landscape characteristics, the property must cogently reflect the period of time in which the important events took place." (National Register Bulletin 30:13)*

*Most rural areas, if researched intensively, can establish who grew what, when, and in what quantities in relation to the region around them, fulfilling the first two steps described above. The higher test, however, is the third step: establishing integrity-- that what physically remains substantiates and "cogently reflects" that past. Cooper's Cove did not meet this test.*

*Cooper's Cove, like many areas in the region, has some memory of its past, chiefly through family names associated with properties. This connection, however, is weakened by the rapidly declining number and condition of the physical links to that past and by the on-going subdivision of land in the area. Development, mostly residential, has spread from the north from Roanoke City and County and from the Roanoke River and Smith Mountain Lake. On-going development has spread from Rt. 116 to the west and from Rt. 635 to the south and east. Logging is active in the area; a number of parcel records contain notes about the practice, and logging companies and housing contractors own a number of parcels.*

*Mr. Reem failed to mention the number of abandoned, deteriorated buildings that he counted as contributing. Tax records indicate that a large number of older dwellings are not occupied; a number have been replaced as housing stock by mobile homes, trailers, and conventional modern homes. Mr.*

Reem's photographs of buildings identified as CC59A, 18, 34A, 86, 88, and 53 all showed vacant/overgrown/deteriorating structures. The Cooper Bandy House, described as separated from the core potential district by intervening development, has long since been replaced by a modern dwelling. Vacant, deteriorating buildings did not indicate a high level of community commitment to their preservation.

The boundaries Mr. Reem has described and those shown on his map are not in agreement. Carrying a district north of Rt. 681 onto Rt. 617 at Cooper's Cove Church relies on a tenuous connection at a point where so many modern dwellings now exist. Also, although Mr. Reem said that the Whispering Heights subdivision was excluded from his district, his map included the extensive limits of Section 1 of the subdivision.

National Register Bulletin 30, *Guidelines for Evaluating and Documenting Rural Historic Landscapes*; 23) gives some direction in assessing the integrity of rural landscapes. The following changes, when occurring after the period of significance may reduce the historic integrity of a rural landscape:

- Abandonment and realignment of roadways
- Widening and resurfacing of historic roadways
- Replacement of structures
- Changes in land use and management that alter vegetation, change the size and shape of fields, erase boundary demarcations, and flatten the contours of the land
- Introduction of non-historic land uses, including subdivision for residential, commercial, or industrial development; it is assumed that modern logging would be included as a non-historic land use
- Deterioration, abandonment of historic buildings
- Substantial alteration of buildings and structures
- Construction of new buildings and structures

The area labeled by Mr. Reem as Cooper's Cove has experienced all of the changes listed above, in varying degrees.

National Register Bulletin 15 provides the most succinct and germane guidance on integrity. The bulletin says that "ultimately, the question of integrity is answered by whether or not the property retains the identity for which it is significant" and suggests that a basic integrity test for a property "is whether a historical contemporary would recognize the property as it exists today." (National Register Bulletin 15: 45,48) Given the number and degree of changes over the years, an historical contemporary would have difficulty finding his way around Cooper's Cove as it exists today.

Using the above information, the eligibility of Coopers Cove was coordinated with the Virginia Department of Historic Resources. On August 8, 2002, the Virginia State Historic Preservation Officer (SHPO) concurred that Cooper's Cove was not eligible for the National Register of Historic Places. Despite agreement between the SHPO and the FHWA over the districts eligibility, the matter was referred to the Keeper of the National Register. On October 18, 2002, the Keeper reaffirmed that Cooper's Cove was not eligible.

2. Any road construction through Cooper's Cove would violate VDOT promises made at early public meetings that they "don't cut communities in half." I-73 would do just that.

The Federal Highway Administration's Community Impact Assessment (Publication No.FHWA-PD-96-036 WEP-30/8-98(10M) P) states, "In the evaluation and selection of a preferred alternative, the community impact assessment should be considered at least equal to other environmental studies..." Not only was no community impact assessment made, Cooper's Cove was never considered by the DEIS as a distinct community. This despite FHWA statements in the same manual that community impact assessments are, "legally required and supported by major Federal regulations, statues, policies, technical advisories, and Executive orders..."

**Response:** Components of a community impact assessment, according to the Federal Highway Administration's Community Impact Assessment (Publication No.FHWA-PD-96-036 WEP-30/8-98(10M)

*P), include development of a community profile (neighborhood boundaries, locations of residences and businesses, demographic information, economic data, social history of communities, and land use plans), analysis of community impacts, and identification of potential solutions. These components have been included in the I-73 DEIS as part of the Land Use section and are also developed in more detail in the Land Use, Socioeconomic, and Farmlands Technical Memorandum. Information on residence and business locations is also included in the Right-of-Way and Relocations Technical Memorandum. While federal regulations, statutes, policies, technical advisories, and Executive Orders require the consideration of impacts of highway projects on the human environment, they do not require or prescribe a particular method for conducting the assessment. Therefore, the publication referenced above was published by the Federal Highway Administration as guidance to assist state highway agencies in assessing impacts to the human environment. The document provides a methodology for assessing this impact, which consists of community interviews, but interviews themselves are not a regulatory requirement. While a specific document entitled "Community Impact Assessment" was not produced, impacts to the human environment were addressed in the draft Environmental Impact Statement.*

*Early in the study process, neighborhood descriptions were collected through phone interviews with county and agency staff that work with the neighborhoods and from local comprehensive plans. In this early data collection phase, Cooper's Cove was not identified as a distinct community by the County. Efforts were made during the analysis of alternatives to avoid residences and businesses to the maximum extent possible. In this section of Franklin County, topographic constraints limit the degree to which the alignment could be shifted to the east or west of Cooper's Cove. Efforts will be made during final design to further limit impacts to communities to every extent practicable. Since the circulation of the draft EIS, the CTB has approved a location corridor that would utilize existing I-581 and U.S. Route 220, thereby, avoiding segments 372 and 278A.*

3. Segment 372's crossing of Smith Mountain Lake as it enters Cooper's Cove is not fully addressed in the DEIS. Segment 372 crosses the Roanoke River channel at a point where landowners were paid by APCO for property that was flooded by the lake's construction. This point is one mile from Bay Rock Marina and a busy public boat landing. Boaters, skiers, and fishermen frequently use the waters around the proposed crossing, clearly illustrating that Smith Mountain Lake is a public recreation facility. As such, it requires special consideration not given in the DEIS.

Furthermore, proposed future use of SML as a public water source raises additional concerns about segment 372's (Option 1 and 1a) impact on water quality.

Segment 287A (Option 2a) also crosses the lower portion of Back Creek a major tributary to Smith Mountain Lake.

**Response:** *Based on other comments received on the draft EIS, FHWA has reviewed the applicability of Section 4(f) to Smith Mountain Lake and concluded that Smith Mountain Lake, in its entirety, is not a resource eligible for protection under Section 4(f). Rather, Smith Mountain Lake is considered a multi-use resource, and Section 4(f) only applies to those portions of the lake which function for or are designated in the plans of the administering agency as being for significant park or recreational purposes. For example, Smith Mountain Lake Park, which borders the lake, is considered a Section 4(f) resource because the administering agency, the Virginia Department of Conservation and Recreation, has identified and administers it as a significant park and recreational resource. Likewise, boat access ramps managed by the VDGIF are significant for meeting the region's boating needs. In contrast, AEP, the administering "agency" of the lake, has indicated that the primary purpose of the lake is the generation of energy. Although AEP doesn't have a management plan in place at this time, they consider recreation, which is dispersed about the lake, to be a secondary purpose.*

*This interpretation is also consistent with FHWA's Section 4(f) Policy Paper. Regarding "bodies of waters", the FHWA policy paper states that "when lakes function for park, recreation, or refuge activities, Section 4(f) would only apply to those portions of water which function primarily for those purposes. Section 4(f) does not apply to areas which function primarily for other purposes." As indicated above, the primary function of the lake is for the generation of energy; recreation is a secondary function. Regarding "public multiple-use land holdings," the FHWA policy paper provides similar guidance. This paper*

*states, "Section 4(f) applies...only to those portions of lands which are designated by statute or identified in the management plans of the administering agency as being for park, recreation, or wildlife or waterfowl refuge purposes and which are determined to be significant for such purposes. For public land holdings which do not have management plans, Section 4(f) applies to those areas which function primarily for Section 4(f) purposes; Section 4(f) does not apply to areas of multiple-use lands which function primarily for purposes not protected by Section 4(f)."*

*It is important to note that even though we do not consider Smith Mountain Lake in its entirety to be subject to the requirements of Section 4(f), Options 1 and 1a would not use land encompassed by the lake's boundaries (which includes the tributary crossed by segment 372). Based on conceptual designs, the bridge at this location would be 800 feet long and 135 feet high. The span length would be approximately 200 feet long precluding the need to place piers in the river (the width of the river at this location is approximately 160 feet). Therefore, there would be no "use" of the river and any dispersed recreational activity that takes place on the water would be unaffected. In addition, based on this conceptual design, air rights would not be an issue invoking Section 4(f) per FHWA's Section 4(f) Policy Paper.*

*Certain components of the TSM Alternative and the Build Alternative would be located near enough to public surface water supply withdrawals as to require special mitigation measures, both during and following construction. Such measures would include pollution prevention plans implemented during critical phases of construction and the design of stormwater drainage systems to provide additional protective measures. Measures developed to protect nearby surface water supplies will include stormwater management facilities developed during later design phases and development of SPCC plans. To mitigate temporary construction impacts, an erosion and sediment control plan developed in accordance with the Virginia Sediment and Erosion Handbook will also be implemented. The use and implementation of these types of mitigation measures will be evaluated during the permitting stages of the project and during final design.*

*When VDOT initiated development of the draft Environmental Impact Statement (EIS) for the proposed project, Smith Mountain Lake had been considered a fatal flaw in the development of a reasonable range of alternatives. Therefore, all alternatives that impacted the lake were eliminated from further consideration. As depicted in the draft Environmental Impact Statement (EIS), the eastern most build alternative (Options 1 and 1a, Segment 372) would avoid Smith Mountain Lake but would bridge the Roanoke River, a tributary to the lake. During the I-73 public hearings, a member of the public provided documentation showing that the boundaries of the lake encompassed the section of the Roanoke River bridged by Options 1 and 1a. This was the reason FHWA was asked to provide a position regarding the applicability of Section 4(f) to this portion of Smith Mountain Lake. Even though Back Creek is a tributary to Smith Mountain Lake, the section crossed by segment 287A is too far to the west of the lake to be included in the boundaries of the lake.*

4. Decreasing property values as a result of interstate proximity were also ignored by the DEIS. FHWA's Community Impact assessment lists tax and property value loss as one type of adverse social and economic impact that must be investigated under 23USC 109(h).

Cooper's Cove residents are opposed to Options 1, 1a, and 2a due to the unfair financial burden we would suffer from decreased property values.

**Response:** *Loss of tax revenue was considered in the DEIS and is included on pages 4.2-15 and 4.2-16. Due to the uncertain and speculative nature of property value changes resulting from proximity to the new interstate and from secondary development, loss or gain of property value was not calculated for the DEIS. However, a blanket statement that property values will decrease isn't true under all circumstances. The value of some land, depending upon its land use, would increase as access to the transportation system is improved.*

5. Windy Gap is frequently a high-fog area. Safety concerns resulting from interstate traffic traveling through a fog-blanketed mountain pass were not addressed in the DEIS. Windy Gap's frequent fog would pose a risk to motorists and the surrounding community, as the risk of chemical spills due to wrecks would increase.

**Response:** *Generally speaking, weather-related issues don't necessarily effect the location decision of a roadway but rather, the design of the facility. If an alternative is selected that passes through a mountainous area with frequent fog, VDOT will evaluate measures to improve safety in these locations. Safety measures can include improved lighting, fog detection systems used in conjunction with variable message signs, reflectors, and rumble strips. All roadway design procedures will be conducted in accordance with the American Association of State Highway and Transportation Officials (AASHTO) guidelines. These guidelines incorporate methods to design for safety in mountainous terrain and areas with low visibility.*

6. Wildlife habitat will be fragmented by I-73. This issue and its impact on games species and rare or endangered species is not addressed in the DEIS. Recent sightings of black bears have been made in the Windy Gap/Lynville Mountain area. Fragmentation of remaining habitat could doom remaining populations and disrupt many other species.

**Response:** *Page 4.7-2 of the I-73 DEIS describes impacts related to wildlife habitat fragmentation. Since the endangered species identified as potentially affected by this project did not include any mobile terrestrial wildlife, the issue of habitat fragmentation resulting from construction of an interstate highway is not relevant to any endangered species. Generally speaking, the draft EIS addresses those issues (in this case, specific wildlife species) identified during the scoping process by the public and state and federal resource agencies as being critical issues in the study area. The reason these species were identified as critical issues is because they are protected by federal law and the protection afforded them would likely affect project decision-making. In addition, impacts to migrating bird, in general, was identified as a critical issue requiring further attention and is addressed in the final EIS. In contrast, other wildlife species not protected under federal law and impacts to them are not likely to affect project decision-making. Notwithstanding, species like the Orangefin madtom and Piratebush, which have been listed as threatened and endangered respectively under the Virginia Endangered Species Act, were addressed in the draft EIS by identifying their approximate location and potential impacts to them based upon information provided by the Virginia Department of Game and Inland Fisheries and the Virginia Division of Natural Heritage. Even then, the Virginia ESA only requires the Virginia Department of Transportation to cooperate with the Virginia Department of Game and Inland Fisheries regarding endangered species; the act places no restrictions on VDOT in carrying out construction activities.*

7. The Franklin County Comprehensive Plan, although supportive of the I-73 concept, suggest future land use in much of the Cooper's Cove/Lynville Mountain area as conservation and forestry. An interstate highway would not be compatible with these goals.

**Response:** *Your comment is noted. The presence of an interchange generally has the greatest potential to influence changes in the surrounding land use resulting from an interstate. There are no interchanges planned near the Cooper's Cove Community or the Lynville Mountain Area.*

8. Crime often follows interstates. Its impact on surrounding communities is again listed as an issue to address in Community Impact Assessment. Again, it is an issue ignored by the DEIS but one that concerns Cooper's Cove.

**Response:** *We are not aware of any statistics showing a link between crime and interstate facilities. Notwithstanding, no interchanges are planned near the Cooper's Cove Community, therefore, it is unlikely the interstate will cause changes in land use in the Cooper's Cove Community or provide direct access to the Community for potential criminals.*

In addition to issues not fully addressed by the DEIS, there is ample information within the document to reject options 1, 1a, and 2a. Some highlights follow.

1. These are the longest routes, which would consume more fuel and add needless travel time.
2. Option 1a is the second most expensive of all options.
3. Option 2a displaces more homes than any option other than 3a

4. Option 2a has the most adverse impact on wetlands.
5. Options 2a, 1, and 1a have some of the most adverse impacts on prime farmlands.

**Response:** *Comments noted. It is acknowledged that while each alternative has its advantages and disadvantages, some more prominent than others, the National Environmental Policy Act requires that federal agencies consider a range of reasonable alternatives to address the need that has been identified. This information is presented to the decision makers so that they can then make an informed decision while considering a broad range of factors and issues. An eastern alternative was not initially considered by VDOT for this project but because of feedback from the public at the Citizen Information Meetings, one was included.*

We feel that I-73's many direct and indirect negative impacts outweigh any possible benefits. We believe that the case for a new interstate highway has, been poorly made. We think that public monies would be foolishly spent on a new-terrain I-73.

Again, we express our staunch opposition to options 1, 1a, and 2a. In support of other communities that face similar impacts, we also oppose any new-terrain route for I-73 and support TSM as the only acceptable option for I-73. If Options 1, 1a, or 2a are selected, we will support any litigation or political action necessary to preserve our community against the devastation I-73 would bring.

Respectfully yours,

Doris LeGault, President

Joan Foster, Secretary

Peggy Wright, Vice President

Louise Truman, Treasurer

cc:

Fred Altizer, VDOT Salem District Manager  
Chip Nottingham, VDOT Commissioner  
Lorinda Lionberger, Salem District CTB Representative  
David Gehr, CTB Chair  
Peter Stokely, EPA/EIPIC  
Bruce Blanchard, U. S. Dept. of Interior  
Supervisor John Helms, Boone District (Franklin County)  
Franklin County Board of Supervisors  
Supervisor Harry Nickens, Roanoke County  
Roanoke County Board of Supervisors  
Rep. Virgil H. Goode Jr.  
Rep. Robert W. Goodlatte  
Senator John Edwards  
Senator Roscoe Reynolds  
Del. Dick Cranwell  
Del. Allen Dudley  
Richmond Times Dispatch  
Roanoke Times  
Franklin News Post  
Smith Mountain Lake Eagle  
Virginians for Appropriate Roads  
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Fred Altizer  
Virginia Department of Transportation  
1201 East Broad Street  
Richmond, VA 23219

January 11, 2001

Dear ~~Mr. Altizer~~ Fred

The Appalachian Trail Conference is concerned about deficiencies that we see in the draft environmental impact statement issued on the 1-73 proposal east of I-81. We have been involved in a series of meetings with the Salem office led by Pete Sensabaugh and Rob Cary over the past two years to coordinate the analysis of impacts to the Trail. We have been in the field with VDOT personnel to discuss impacts and needed data. Despite this effort, discussions with VDOT personnel and your contractors at the recent public meeting reveal that the area of the Trail where we believe impacts are the highest were not analyzed in the DEIS. We had a clear agreement with VDOT personnel in the field, that simulations were required from views along along the ridge top between Fulhardt's Knob Shelter and Salt Pond Road which look to the east to the - J Blue Ridge. We believe that these views will prominently feature the massive road cut proposed across the face and over the top of the Blue Ridge if the eastern alternatives are chosen. The section of highway in question is segment 372 from point 800 toward point 900. It is clear from my discussions at the recent public hearing that this ball has been dropped and the lack of this analysis has led to a number of erroneous statements in the DEIS concerning the extent of the impacts on the Trail. We feel that these problems result in the understatement of impacts and consequent lack of consideration of those impacts on the Appalachian National Scenic Trail, a unit of the National Park System, where it lies on U.S. Forest Service lands east of the eastern build alternatives analyzed in the document. We would like to work with VDOT to remedy these problems and analyze the extent of impacts.

As always we stand ready to assist VDOT in any analysis concerning impacts on the Appalachian Trail. Thank you for this opportunity for input.

Sincerely

Mike Dawson  
Regional Representative

National Offices: 799 Washington Street, P.O. Box 807, Harpers Ferry, West Virginia 23425 (304) 535-6331

**Response:** *The Draft EIS did identify the Appalachian Trail as a special visual concern area. It was noted that Segment 372 would enter the visual experience of the southbound Appalachian Trail hiker at the Fullhardt Knob Shelter, in the middleground distance, as the segment moves east of Coyner Mountain and aligns to cross the BRP in the Mountain Pass Road area. Project Team members took photos along the portion of the Appalachian Trail from Fulhardt's Knob to U.S. Route 220 during summer when foliage was heavy and during winter when foliage was non-existent. Segment 372 would be potentially visible to trail hikers for the three-mile (five-kilometer) hike from Fullhardt's Knob Shelter to U.S. Route 11. Toward the top of Tinker Mountain, another two miles (three kilometers) would be exposed to background views and displace farmland scenes, which are the primary subject of view from this part of the Appalachian Trail. These views are often currently impeded however, by trees and foliage that line the trail.*

*The Appalachian Trail was also evaluated as an Activity Category A for noise impacts at three different locations. Activity Category A represents lands on which serenity and quiet are of extraordinary significance and serve an important public need, and where the preservation of those qualities is essential if the area is to continue to serve its intended purposes. The FHWA Noise Abatement Criteria applicable to Activity Category "A" sites is 57 dBA Leq (1 hour). Existing ambient noise levels were recorded along the trail at the three sites as being 45, 47 and 46 decibels. The noise impact analysis using STAMINA 2.0 determined that the noise levels at these three sites under the future no-build condition would be 49, 47, and 46 decibels, respectively. Under the future build condition, the future noise build levels will be 51, 47, and 47 decibels, respectively. Under normal environmental conditions, a 3 decibel increase is barely perceptible to the human ear. Therefore, the only site that would be of concern is the site where existing noise levels of 45 decibels would increase to 51 decibels under the build scenario (even though this noise level only represents a 2 decibel increase over the future no-build noise level). However, as documented in the draft EIS, "noise from I-73 would dissipate to ambient or existing levels [since it is located over 3,000 feet away] and not represent an impact to the Appalachian Trail under [federal] regulations. Instead, noise levels at the Trail will continue to be dominated by existing traffic from I-81."*

*Since the circulation of the DEIS, the CTB has approved a location corridor that would utilize existing I-581 and U.S. Route 220, instead of Segment 372 east of the City. We appreciate your willingness to assist us regarding the analysis of impacts to the Appalachian Trail, but it appears that your assistance will not be necessary given the CTB decision.*

Alan Denekas, MSE, MD.  
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1/8/2001

Mr. Earl T. Robb  
State Environmental Administrator  
Virginia Department of Transportation  
1401 E. Broad St.  
Richmond, VA 23219-2000

Dear Mr. Robb:

I am a resident of southwest Roanoke County and I am speaking in opposition to the I-73 Western Corridor.

First, apparently the shortest and most sensible geographic route for I-73 does not even involve the Roanoke area. The proposed routes through the Roanoke area seem to interject a large "dog leg" into the route. I understand the purpose of this is to bring more traffic, and the resulting commerce, through Roanoke. While this might increase business in Roanoke, it would only increase congestion and accidents on I-81, in precisely the section of that route that is already one of the most dangerous stretches of highway in the country. Also, since traffic engineers are concerned about driving miles and traffic congestion in relation to fuel costs and air pollution, it makes no sense to route the traffic so far out of the shortest route.

**Response:** *VDOT conducted a feasibility study that looked at a number of corridors for the proposed I-73 in southwestern Virginia before selecting the current corridor through the City of Roanoke. These proposed corridors are shown on Figure 2.2-1 of the DEIS and are discussed in detail in Section 2.2, Alternatives Development and Alternatives Eliminated From Study. The feasibility study evaluated five criteria: environmental impacts, economic impacts, traffic service, capital support, and public support. In March of 1994, based on the results of this study, the Commonwealth Transportation Board selected a proposed location for the I-73 corridor that entered Virginia from West Virginia on Route 460 west of Narrows, and which generally followed Routes 460 and 220 to the North Carolina State line. In late 1994, the cities of Roanoke and Salem and the County of Roanoke expressed a desire that the location of I-73 be improved by routing it along I-581 and I-81. In December of 1994, VDOT prepared a supplemental report for I-73 that determined it feasible to refine the location of I-73 using I-581 and I-81. With the passage of the NHS Designation Act of 1995, Congress included the CTB-approved corridor for Interstate 73 in legislation which was the impetus for the draft EIS.*

*A Tier I EIS has been initiated for Interstate 81 for the entire 325 mile corridor in Virginia that will look at improvements to that facility to increase capacity and safety.*

Second, speaking as someone with a Master's degree in engineering and much experience in mathematical modeling, I submit that, although there are some quantitative advantages to the construction of the western corridor, many of the benefits are marginal or small. And, given the length of time over which these projections are made and the vagueness of some of the parameters, these figures should definitely not be the only factors taken into consideration in the construction of this highway. This is not to assert that the DEIS figures are incorrect, or that there are figures to the contrary, only that there

are limits on the precision of mathematical modeling, and that these figures need to be regarded as less than the absolute last word in the undertaking of this formidable project.

**Response:** *Your comment on the limitation of models and the accuracy of the results is noted.*

One significant quantitative factor in the western corridor is the very mountainous topography of the area. Similar topography apparently tripled the estimated cost of another stretch of highway constructed in this region. There have also been no soil/substrate studies done in the western corridor area to see whether construction is even feasible here. I understand that, from a civil engineering perspective, cost estimates are much more reliable in areas like the I-581 - 220 corridor than in the relatively uncharted areas of the eastern and western corridors, where less is known about the topography, the soil and the substrates. Enlarging route 221 from I-73 back into Roanoke would further substantially increase the cost of this route and would greatly increase the number of homes and businesses affected that appear not to have been included in the present analysis.

**Response:** *The construction costs were developed in part by utilizing VDOT's database of project costs. The unit costs for roadway construction items were obtained from VDOT computerized cost estimating system. Quantities from bid tabulations from similar roadway projects along with approximate quantities developed specifically for this project were input into VDOT cost estimating system. The unit costs were then compiled to develop per mile costs for the various elements and roadway typical sections. Generally speaking, cost estimates are only as accurate as the design information supporting them. Since VDOT is limited in conducting final design activities during the environmental process, the cost estimates are based on limited design, geological, and topographical information.*

Third, the DEIS does not take into account the phenomenon of interstate related crime. The western corridor would require a massive cloverleaf entrance and exit interchange near Poage's Mill Farm, where I-73 crosses 221. Although the area is currently zoned agricultural and residential, no doubt the zoning would change, and businesses would spring up around the interchange. These would mostly be low-income businesses, such as fast-food restaurants, gas stations and cheap motels. These in turn could become places where alcohol and drugs are prevalent, particularly since this highway runs from Charleston a port city, to Detroit, on the Canadian border. Hence, it could well become a major drug thoroughfare. Further, areas near interstate entrances and exits are targets for robbery and burglary, since the perpetrators can get off the highway, commit their crimes and be back on the interstate with their loot before law enforcement personnel can even get to the scene. The relatively high-income homes in this area would be ideal targets for this type of crime. Additionally, this would all take place within very close proximity to six schools: Back Creek Elementary, Cave Spring Elementary, Penn Forest Elementary, Cave Spring Junior High, North Cross School (K-12) and the new Roanoke County high school. Besides the human cost to the area and the students at these schools, there would be major increases in law enforcement costs in an area where these costs are now quite low.

**Response:** *Comment noted.*

Fourth, this interchange would cause huge increases in traffic in an area where there is currently little problem. As it would be the only exit into Roanoke off of I-73, it would massively increase traffic, especially on 221 (Brambleton/Bent Mountain Rd.). This presents a number of problems. All the above schools are either directly on or in very close proximity to 221. This would create traffic congestion problems during the morning drop-off and afternoon pick-up times, with the attendant risk of accidents involving students. Additionally, this exit would also be some distance from downtown Roanoke, which would make access to the city very awkward. It would either require the routing of traffic along 221 through residential areas, with the attendant costs of enlarging that route, or to the already busy route 419 and back up to 220 for access to the central city. Therefore, why not just build up I-581- 220 to begin with? If the whole reason for routing I-73 through Roanoke in the first place was to bring commerce to the city, it does not make much sense to build in a corridor that would actually shunt most traffic around the city and would provide only very awkward access to the commercial center of the city.

Further, locating this exit south of town would cause some businesses to locate in the county. Both routing traffic around the city and causing businesses to locate in the county would lessen the income the interstate could bring to Roanoke City.

**Response:** *Section 2.6.11, Build Alternative – Option 4, states that the northern portion of I-73 will be served by a full cloverleaf interchange located at U.S. Route 221, and a diamond interchange located at U.S. Route 220. In addition, the Virginia Statewide Transportation Improvement Program (STIP) identifies committed and funded improvements to U.S. Route 221. These improvements involve the reconstruction of the roadway from 2 to 4 lanes and would thereby, improve safety and ease congestion for motorist traveling to and from Roanoke. Some of the issues that you have raised regarding the movement of traffic around the City and access to the commercial center of the City were reinforced by the results of the traffic study, which shows the centrally located alternatives carrying the most traffic and as a result, are some of the benefits that those alternatives offer. The CTB has since approved a location corridor that would utilize existing I-581 and U.S. Route 220.*

Fifth, the reason many people move to Roanoke is the opportunity to live in a quiet, scenic, semi-rural area but to still be close to town. The western corridor would completely destroy this attractive feature in a large section of Roanoke County. The people who live in this area are largely upper-income, professional people, whom Roanoke would hopefully like to attract. They also pay a significant amount in real estate taxes, as the property values in this part of the county are quite high. The western corridor, therefore, could well alienate a number of professional people from the area and weaken the tax base in Roanoke County.

**Response:** *Comment noted. Based on the public hearing, the southern alternative received a lot of opposition. The CTB has since approved a location corridor that would utilize existing I-581 and U.S. Route 220.*

Sixth, the interstate, the interchange at 221 and the attendant businesses that would come into the area would completely devastate the natural beauty of this picturesque and quiet part of the county. It would also have the largest impact on the Blue Ridge Parkway and the Parkway's viewshed, as it would irreparably scar the hillsides of Mt. Chestnut and Twelve-O'Clock Knob as well as a square-mile area of the valley around Poage's Mill.

**Response:** *Visual impacts associated with the northern portion of Option 4 were addressed in Section 4.5, Visual Quality, of the document. The impacts to the Blue Ridge Parkway at this location are reasons the National Park Service do not favor this alternative either. The CTB has since approved a location corridor that would utilize existing I-581 and U.S. Route 220, which includes the NPS's preferred crossing of the Blue Ridge Parkway.*

In short, the western corridor is not desirable because 1) the quantitative advantages to this route are questionable, 2) there would be hidden costs in the form of increased costs for enlarging 221 back into Roanoke, increased law enforcement costs for traffic and crime and decreases in the tax base, and 3) it would qualitatively transform a quiet, aesthetically beautiful area with little or no traffic, air- or noise pollution and crime into an area with all of those, especially with increased danger from traffic, drugs and other crime to the students at six schools.

**Response:** *Comment noted. It is acknowledged that while each alternative has its advantages and disadvantages, some more prominent than others, the National Environmental Policy Act requires that federal agencies consider a range of reasonable alternatives to address the need that has been identified. This information is presented to the decision makers so that they can then make an informed decision while considering a broad range of factors and issues.*

It would seem to make much more sense to either route I-73 more directly towards North Carolina, or, if it must come through Roanoke, to use the already built-up I-581 - 220 corridor, where the

qualitative impact would be much less than either the eastern or the western corridors. The other attractive course of action would be the "no build" (TSM) option, to make improvements to the existing I-581-220 but otherwise leave the area alone. This would be by far the cheapest and would have the greatest return on investment. One study at Virginia Tech apparently determined that this approach would return approximately \$3.00 for every dollar invested, while building an interstate through the same corridor would only break even.

**Response:** *Cost is just one issue that decision-makers must take into consideration before arriving at a decision. The TSM alternative is not the same as the No-Build alternative although there are many similarities in terms of the impact that they will have on the environment. TSM improvements are designed to enhance safety on existing US Route 220. TSM will not however bring all of US Route 220 up to current VDOT or AASHTO design standards for roadways currently classified as urban or rural principal arterials. Implicit in that standard is the improved safety features that accrue with the horizontal and vertical geometry of a principal arterial. TSM improvements would not assure that US Route 220 could achieve the safety level of a divided arterial highway design*

*In the long run true safety benefits, which include fatalities, bodily injury and property damage, are enhanced with the proposed interstate alternative. An interstate facility provides significant accident rate reductions over the conventional urban and rural arterial. According to statistics compiled for the year 2000, the National Highway Traffic Safety Administration indicates Virginia's interstate system has a fatality rate of 66 deaths per 100 million vehicle miles traveled in rural areas whereas principal arterials have a fatality rate of 102 deaths per 100 million vehicle miles traveled. In terms of saving lives, an interstate facility reduces fatalities by 35.3%.*

*The TSM ranges from 10.76% to 13.19% of the cost for the full build options, but the TSM alternative would not rebuild many miles of US Route 220. The TSM improvements affect approximately 86,600 LF of US Route 220 from Roanoke to the North Carolina line. This represents 30.8% of the 281,000 LF of US Route 220 from Roanoke to the North Carolina state line. The 86,600 LF of TSM improvements to US Route 220 include an array of minor and major improvements ranging from additional left turn lanes, the closing of median crossovers, signal improvements, shoulder widening to major grade and pavement replacement. TSM is a series of spot improvements that address immediate safety needs along 16.4 miles of roadway*

*The TSM alternative lacks convincing components of the I-73 purpose and need such as:*

- *TSM will not enhance the functional classification of US Route 220,*
- *TSM will not increase capacity of the entire US Route 220 corridor, nor will it improve the level of service,*
- *TSM will not improve mobility and access between Virginia and other regions,*
- *TSM will not attract the economic activity of an Interstate facility,*
- *TSM does not address the Congressional mandate in the TEA 21 highway reauthorization act.*

*As a \$146 million alternative TSM is not a low cost alternative for scattered improvements to 16.4 miles of rural principal arterial highway. TSM is lacking in terms of its operating benefits and characteristics when compared to the more aggressive interstate alternatives.*

*As for the return on investment, the development of public infrastructure has historically been questioned both in regards to the role of government in these type of decisions and the engineering economy of the investment decision. Transportation capital investment decisions are often made under the rationale of both. The role of government is often championed as the provider of services that privately can not be established under the criteria of return on investment. Thus, it is commonly accepted that in matters of defense, public works and education, the state and federal government have a primary role. In general, the private sector has neither the capital nor the patience to realize the slow rate of return that public infrastructure entails. One of the first acts of the US Congress was to appropriate funds to construct a*

*lighthouse in Virginia to aid in the safety of shipping and to promote commerce. The capital cost and the on-going maintenance of the lighthouse were secondary to the contribution of the lighthouse to the general welfare of the population.*

*The benefits and costs of transportation investment are both direct and indirect and have been extensively studied since the mid-nineteenth century. The sub-discipline has been known as engineering economics and has been in place institutionally long before MBA and business economic programs. This literature can be traced back to the mid-nineteenth century with the classic texts of W. M. Gillespie in 1848 and A. M. Wellington in 1887. Growing academic interests in the 1920's increased the body of literature on the economics of roadway investment. The American Association of State Highway and Transportation Officials (AASHTO) published the first discounted present value approach in 1952 and 1960. In 1977 AASHTO published A Manual on User Benefit Analysis of Highway and Bus Transit Improvements. The 1977 Manual is the seminal treatment of benefit cost ratio analysis for transportation projects. The DEIS, in section 4.12 (Secondary and Cumulative Impacts), references several large scale economic research endeavors that clearly and statistically link economic growth with highway transportation investment.*

*A recent VDOT/FHWA feasibility study for the TransAmerica corridor across the state, which would have an alignment that coincides with I-73 west of Blacksburg, clearly illustrated the economic and user benefit of transforming substandard rural arterial facilities to a higher standard. A benefit cost ratio analysis for the TransAmerica project resulted in robust B/C ratios and job growth impacts of approximately 69,000 full time equivalent jobs.*

*The conclusion that transportation investment in Interstate and other high end highways has less utility in terms of rate of return now than during the early 1960's should be no surprise to anyone. The same can be said of investment in computers, cell phones or cancer treatment technology. Declining rates of return on investment are expected as markets become saturated. Incremental increases under that scenario naturally exhibit a declining rate of return.*

*What is important is there is still a rate of return on highway capital investment. This is illustrated in Figure 3.2.1 as taken from the FHWA article "Contribution of Highway Capital to Output and Productivity Growth in the US Economy and Industries", by I. Nadiri, August, 1998. This figure compares rate of return on highway capital in ten year increments from 1960 to 1991. The fact that highway capital in 1991 realized just under a 10% return is remarkable. By definition, a public project that provides a positive return on investment not only adds value to public welfare but also exceeds the benefit cost ratio of unity, where the long term monetized benefit of the project exceeds the long term capital and maintenance cost of the project.*

*While capacity expansion of highway investment has slowed over the last decade the growth in demand has not. That trend, if not countered, has serious consequences on mobility, air quality and quality of life. It is important to note that VMT has historically increased in the last three decades at rates in excess of population or employment growth. This is a national trend and manifests itself statewide and locally and has no correlation with growth in roadway capacity. Nationally, VMT has increase 37% from 1984 to 1994. During the same period in Virginia, VMT increased 52%. During that same period, new construction adding roadway capacity has increased only 9% to 10%.*

*Nationally, VMT has increased 259% from 1960 to 1997, a pace that outstrips growth in fuel consumption, vehicle registration, population, and roadway capacity. The growth in VMT has occurred far ahead of roadway network capacity. From 1993 to 1999 in the Southeast, the 14 largest metropolitan areas exhibited an annual average growth rate in new roadway mileage of 1.3%. During that same period VMT grew at an annual average rate 3.4%.*

*Information acknowledged by EPA reinforces these trends. According to statistics referenced by EPA in Indicators of Environmental Impacts of Transportation, the U.S. population has grown by 30% the past*

*30 years, the number of licensed vehicles is up 87 percent and the number of vehicle miles driven has increased more than 125 percent. In contrast, new highway capacity has only increased 6 percent in that timeframe.*

*Addressing the decline in highway capacity to handle the growth in travel demand cannot be accomplished with maintenance measures. This was measured in the I-73 Draft EIS during the evaluation of the No-Build and TSM alternatives, neither of which were responsive to the project purpose and need. Congress realized this in the passage of the Intermodal Surface Transportation Efficiency Act of 1991 and the Transportation Equity Act for the 21<sup>st</sup> Century in 1998 where I-73 was identified as a high priority corridor.*

*Notwithstanding, FHWA requested a benefit-cost analysis for the alternative approved by the CTB in response to public comment. This information is included in the appendices to the final EIS. Basically, the results of this analysis demonstrate that the benefit-cost of the facility in rural areas will be much lower than the benefit-cost of the facility in developed areas. This follows logically because traffic is greater in developed areas and it has the supporting infrastructure and population to more readily accommodate economic development than rural areas do. Therefore, the benefits are greater. Specifically, the benefit-cost analysis evaluated the direct user and non-user benefits and compared these benefits to the capital and operating costs of I-73 over 30 years. Direct user and non-user benefits include travel time savings, reductions in crashes, decline in vehicle operating costs, agency cost reductions and a diminishing of pollution costs. Capital costs include engineering, construction, environmental mitigation, and right-of-way elements. Operating costs include the cost of maintenance and minor repairs to the facility over time. The benefit-cost analysis indicates that the alternative selected by the CTB exhibits a positive net present value with benefits that exceed cost for all discount rates less than 6.6%. The 30-year Treasury bond yield on bonds sold in November 2004 by comparison was 4.84%.*

Respectfully submitted,

Alan Denekas, MD

January 7, 2001

Shirley Y. Ybarra  
Commonwealth Transportation Board  
Chair  
1401 E. Broad St.  
Richmond VA 23219

Dear Ms. Ybarra.

I urge you to reconsider your support for routing I73 through the Roanoke area. I appreciate your intent of providing economic benefit to the Roanoke area. But if I73 runs through Roanoke it will do one of two things: following the central corridor. I73 would create gridlock throughout the central parts of Roanoke or following the eastern or western routes. I73 would bypass Roanoke while ruining the current desirability of these areas.

**Response:** *In urbanized areas, Interstate facilities must be designed to meet a minimum level of service (LOS D) that has been developed to ensure that gridlock does not occur.*

Instead I73 (if it is required at all) should be routed directly from Christiansburg to Martinsville bypassing the I81/220 corridor. The direct route would have several benefits. It would facilitate the movement of people and goods by making eliminating the unnecessary 30 or so miles required for the dogleg through Roanoke (saving the taxpayers millions of dollars). It would reduce the burden on US220 between Roanoke and Martinsville making the TSM upgrades to 220 adequate to improve safety and efficiency. The direct route would create a direct link between Martinsville and VPI that would offer significant long-term economic opportunities to Martinsville. Finally, the direct route would create a triad of Roanoke-Blacksburg-Martinsville that has much greater potential to advance economic development for southeastern VA than just routing I73 along a largely existing I81-US220 corridor.

Routing I73 from Christiansburg to Roanoke to Martinsville along I81 and 220 is ill conceived for a number of reasons. It would dump a large volume of additional traffic on an already overburdened I81 between 460 and Roanoke. It would force an interstate intersection onto a community that largely does not want it (based on the majority of public opinion at the public meetings) because of the anticipated detriment to the quality of life in Roanoke (reduced air quality, safety, increased traffic and a spoiled viewshed). The pristine mountains surrounding Roanoke are major assets, but this also makes it ill suited to become the next Charlotte. Trying to force Roanoke to grow beyond its means will destroy the very things that make Roanoke desirable and distinguish it from its sprawling neighbors. Destroying the reasons many people choose to move here and live here does not serve the long-term interest of Roanoke. We can do much more for the economic development of Roanoke by giving our full support to projects like the Carillion Biomedical Center and urban renew than an interstate interchange will ever do. As a land locked city, Roanoke must be very selective about its economic development and not be misled into pursuing low quality economic development an interstate tends to bring.

I urge you again to do everything in your power to route I73 directly from Christiansburg to Martinsville without detouring to Roanoke. This is the only sensible route for efficient transportation regional economic development and taxpayer accountability.

**Response:** *VDOT conducted a feasibility study that looked at a number of corridors for the proposed I-73 in southwestern Virginia before selecting the current corridor through the City of Roanoke. These proposed corridors are shown on Figure 2.2-1 of the DEIS and are discussed in detail in Section 2.2, Alternatives Development and Alternatives Eliminated From Study. The feasibility study evaluated five criteria: environmental impacts, economic impacts, traffic service, capital support, and public support. In March of 1994, based on the results of this study, the Commonwealth Transportation Board selected a proposed location for the I-73 corridor that entered Virginia from West Virginia on Route 460 west of Narrows, and which generally followed Routes 460 and 220 to the North Carolina State line. In late 1994, the cities of Roanoke and Salem and the County of Roanoke expressed a desire that the location of I-73 be improved by routing it along I-581 and I-81. In December of 1994, VDOT prepared a supplemental report for I-73 that determined it feasible to refine the location of I-73 using I-581 and I-81. With the passage of the NHS Designation Act of 1995, Congress included the CTB-approved corridor for Interstate 73 in legislation which was the impetus for the draft EIS.*

*Initially, VDOT did not propose to look at an alternative east of the City of Roanoke in Botetourt County. However, in response to public comment at the Citizen Information Meetings, VDOT included as eastern alignment in the draft EIS for consideration.*

Regards,

Roger Dickenson, Ph.D.  
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January 12, 2001  
Mr. Fred Altizer  
VDOT  
P.O. Box 3071  
Salem, VA 24153

Dear Mr. Altizer,

I want the following comments regarding the DEIS to be included in the public comment. I have spent some time reviewing the DEIS and my comments are as follows:

**Traffic and Transportation (page S-35)**

- The projected ADT for the Western corridor was the highest. Is this because it is the shortest route? If ADT were projected for the original corridor of I-73, down I-77, the ADT would be higher because more people would use the road if it were not such a detour from a direct route for I-73.

**Response:** *The western alignment, Option 4, is forecast to carry a higher amount of traffic in the southern sections as compared to the three other I-73 options. In the northern section of the study area, Option 4 actually carries the lowest volume of traffic as compared to the other three options. The larger overall traffic volume use in the southern sections of I-73 in Option 4 is due in part to the western alignment of Option 4, which provides a shorter connection to I-73 north of the study area. The shorter connection on the northern part of the alignment to I-73 increases the attractiveness of the route for some motorists. In addition, the western alignment provides for a bypass of the more heavily traveled highway sections of I-81 and I-581 in the Roanoke area, decreasing the travel times associated with travel through the I-73 corridor, but attracting little local traffic. The location of I-73 along the I-77 corridor would be redundant to an area already served by a limited access facility and would not serve the trips within this study area, including those currently using I-581 and US 220, and those originating or destined to points specifically located within the overall state to state I-73 corridor.*

- It is also stated that there are slight differences in traffic volume. What about the big draw of traffic due to the "large projected economic development in the region?" What about the tourist traffic, which would be more likely to enter downtown, Roanoke, in the central corridor or Explore park in the eastern route? The Western route provides the most traffic relief to I-58 I because people wouldn't be coming into Roanoke if they did not have to. They do not need to travel any further east out of the way.

**Response:** *The traffic analysis takes into account existing and future land uses as well as major traffic generators like tourist attractions. In addition, overall planned economic growth is included as part of the future condition traffic projections. Traffic projections for a future year condition take into account roadway and transportation projects identified in the regional and any local transportation improvement plan (TIP) and also planned and forecast land development based on available land and planned initiatives. Large-scale development proposals, such as the proposed Bio-Technology Park in Roanoke, would be required to detail their impacts on the existing and proposed roadway system as it is developed. Additional analysis, however, has been conducted for the I-73 project with the information currently available concerning the Bio-Technology Park development to ensure an adequate design of the new roadway facility with planned interchanges and junctions in the development area, for Options 2 and 3. A more thorough analysis of the highway and interchanges along the facility, including the heavily traveled sections of I-581 through downtown Roanoke, would occur during the final design stages to determine the final design features of the roadway.*

*Tourist traffic, and traffic destined to points in and near the downtown sections of Roanoke, would be best served by an improved facility through the core of the City as proposed in Options 2 and 3.*

- It is disturbing that the study does not include any accounting of the accident rate increase on I-81 between Blacksburg and Roanoke. This increase could far outweigh any supposed reductions in other areas.

**Response:** *The detailed accident and safety analysis conducted as part of the DEIS focused on the sections of US 220 and proposed I-73 within the study area which stretched from I-81 to the North*

Carolina state line. A separate EIS would be prepared for the I-73 corridor between Roanoke and the Virginia/West Virginia state line at a future date when funding allows. This EIS would address the accident rate on I-81 between Roanoke and Blacksburg. Notwithstanding, the EIS considered the influence of I-73 traffic on I-81 in the vicinity of Roanoke and determined that it would not force improvements on I-81 above and beyond what was already programmed for the area. Therefore, I-73 will not create an unsafe condition on I-81.

A detailed comparison of accident rates was conducted in response to the question for I-81 and US 220 for the year 1995. Using DEIS referenced VDOT information for the referenced year, overall accident rates based on the number of accidents and daily traffic volumes are around 70 accidents per million vehicle miles (Acc/MVM) along US 220 and 41 Acc/MVM northbound and 46 Acc/MVM southbound along I-81. This indicates a substantial difference in the overall accident rates, with I-81 being the safer of the two facilities. In addition, the difference in the number of fatal accidents is substantial, with the US 220 highway having a death rate almost 55% greater than I-81. While these are overall values, this would indicate that an interstate type facility, such as I-81, would be safer to travel on as compared to sections of US 220.

In addition, a Tier I EIS is being prepared for I-81 covering the 325-mile corridor in Virginia to address the needs associated with that route and to determine how those needs will be addressed.

## **Land Use**

The "land use" section points toward a few different conclusions:

- On page "S-8", the DEIS states that "All of the local governments' comprehensive plans identified needs for improved safety and a transportation system that compliments the planned growth in the area. Improvements associated with either the No-Build Alternative or the TSM Alternative will be compatible with the locally approved comprehensive plans and those of the regional planning agencies. Each of the elements in the No build and TSM Alternatives would improve a localized traffic condition or improve safety on the local road system." These statements support the No Build or TSM options.
- The Henry County organizations seem to be in favor of a road east of the city such as Options 1,1a, 2,2a, 2b, or 2c.
- The DEIS needs to be updated with the fact that the Roanoke County Board of Supervisors recently passed a resolution against Option 4.

**Response:** *The most recent Roanoke County Board of Supervisors resolution regarding a "preferred" alignment for the I-73 project makes no mention of Option 4. Resolution No. 090898-1 neither accepts or rejects Option 4 as described in the DEIS, but rather the I-73 corridor, as proposed in the Corridor Feasibility Study which routes the proposed roadway through the City of Roanoke. It is important to point out that the corridor was originally proposed to be located south of the Cities of Roanoke and Salem and was only re-routed through the City of Roanoke based on feedback from the localities in 1994.*

*As for the comment on page S-8, the question is what alternative best addresses the purpose and need for the project when taking into consideration its impacts to the natural and social environment. While the No-build and TSM Alternatives have limited benefit in terms of localized traffic, consideration must be given to the variety of other factors that were evaluated in the draft EIS before arriving at a final decision.*

## **In Table S-1, the "Comparative Summary of Environmental Impacts":**

- The data on air and noise are misleading as they include the total impact on air and noise rather than the change in air quality and noise pollution as a result of the option being considered. It may lead to some incorrect conclusions regarding the options in question.

**Response:** *The information contained in the summary table is meant to provide a quick quantitative comparison of the alternatives under consideration. The reader should refer to Sections 4.3 and 4.4 of*

the draft EIS for detailed information on the change in noise and air quality that would result from the implementation of each alternative under consideration.

## **Economic Development**

The DEIS does not make a convincing case for a growth in high quality and sustainable economic development following the construction of I-73. This is disturbing since I-73 is being SOLD to the public based upon the precept of economic development.

- Economic development is listed in section S.5 "Unresolved issues and areas of controversy" section as not being "quantified [or having] been [quantified] into a dollar figure for comparison to the cost."
- A cost-benefit analysis has also not been done. The report brushes it off as too complicated, but is worth the effort since there is so much at stake.

**Response:** *In Section 4.12, Secondary and Cumulative Impacts, the document discusses the economic impacts associated with the construction of I-73 by examining the potential for economic development based on information from studies performed specifically for the project as well as studies performed for similar transportation improvement projects. Since the draft EIS was completed, a cost-benefit analysis was prepared for the location corridor approved by the CTB and the results are included in the final EIS.*

*Further, the EIS acknowledges that an interstate facility is no guarantee of economic development; instead, it creates the potential. As stated in the draft EIS, an interstate facility is a tool that a locality could use to attract development, and the localities and business community in the study area have generally supported an interstate facility because of the potential associated with it. There are many factors that will ultimately influence where and when development will take place, its nature and its intensity. These factors not only include an adequate transportation system but also include issues such as water and sewer lines, quality of schools and other public services, undevelopable land (e.g. wetlands, floodplains, parks, slope conditions, etc.), land acquisition and development costs, distance to residential development, impact fees and zoning ordinances, etc.*

- Section 2.3.1.2 states that "The TransAmerica study concluded that improvements to the U.S. Route 460 and U.S. Route 220 corridor would provide statewide user benefits that exceeded the project's cost by a factor of 4.1 to 2.6 depending upon the alternative selected." The implication in this statement is that improvements to 460 and 220 and not a HIGHWAY are required to gain benefits. If one assumes that a new build highway is a prerequisite, does this basically take into account the increase in demand for construction, engineering and related services to build the road? The employment figures are similarly in question.

**Response:** *A component of the purpose and need for this project is to foster economic development. Whether or not this development will occur is not the question. Numerous parallel studies support this basic premise. The analysis conducted for the Trans America Corridor concluded that there was a magnitude of difference in economic development that could be realized by the corridors under consideration. Partially, the basis for this determination was the impact of travel time savings, operational economies in fuel and maintenance and the economic benefit of reductions in fatalities, personal injury and property damages that accrue to a safer transportation corridor. Secondly, employers and developers will concentrate their investment around interchanges that link to such facilities all other things being equal such as educational base, quality of life and cultural features of the area. The Trans America Corridor Study also concluded that there is a substantive difference in terms of economic development for a roadway constructed to an Interstate design standard versus a roadway conducted to a lesser design standard.*

*Therefore, it is implied that the construction of a new build highway on new location and not TSM improvements to U.S. Route 220 and U.S. Route 460 would generate the greatest economic benefits. Finally, the benefits did take into account the cost of construction of the selected alternative.*

- Section 2.3.1.2 also references a report by the City of Roanoke, "Economic Impact of I-73 Alignments On the City of Roanoke, February 2000". No findings from the study are presented.

The study apparently did not look into reasonable forecasts of economic development such as employment, tax revenue or spending only traffic, travel time and the like.

**Response:** *The findings and conclusions for the independent economic impact study conducted for the City of Roanoke are discussed in Section 4.12.2 of the DEIS (Traffic, Transportation and Economic Related Cumulative Impacts). The study findings identified five principal factors related to transportation investment that influenced the city's economic base. These factors include access to activity sites/centers within the city, travel time reduction, shifting of traffic behavior/volumes, reductions in congestion delay and minimization of business relocations. The study concerned itself with three base build alternatives and a no-build alternative. The build alternatives assumed an Interstate design standard. The build alternatives included an East Alternative (Option 1) a Central Alternative (Options 2 & 3) and a West Alternative (Option 4). The alternatives were evaluated on how well each addressed the five factors influencing the city's economic base. Conclusions drawn from the study indicated the Central Alternative did the best job of maximizing access to sites, reducing travel times, shifting travel behavior toward the city's CBD and reducing congestion and delay. The No Build Alternative did the best job of minimizing the relocations of businesses but failed to address any of the other four factors. The Western Alternative was a distant second in addressing the five factors influencing the city's economic base. The Eastern Alternative was the least preferred build alternative from an economic impact perspective. The study was cited for informational purposes because it had been conducted by the City relative to the I-73 alternatives under consideration.*

- Section 2.3.1.2 references an assessment of highway bypasses by the NCHRP. The gist of the study was that increased employment followed the construction of a bypass. The increase was not quantified or qualified. Were these the people employed by service businesses at the interchanges, as well as, service people to maintain and patrol the road? Similarly, the study cited "increases in commercial and industrial land uses". Was this also directly attributable to interchange and highway "services"? In addition, the study was an invalid comparison as it was of urban areas smaller than the Roanoke, Salem, and Vinton community.

**Response:** *A straw man comment often received on projects that bypass towns or business districts is that the project will destroy the economic base of the downtown area or business district by diverting through-traffic away from those areas. In anticipation of this comment, the NCHRP study was cited in the EIS to illustrate the amount of scientific research that has been done in this area and the potential positive economic impacts associated with the construction of a highway in a rural environment. While the study focused on population centers smaller than those found in the I-73 corridor, the results found that the construction of these highways did not, generally speaking, have a negative impact on the economy of those areas bypassed or had a very limited impact. The study "summarized" economic survey results from 47 state DOT's and six Canadian DOT's as well as the published results of 190 research articles in arriving at its conclusion. The study did not quantify specific impacts associated with business sales, employment, land use, and land value; instead, it summarized the findings of those research efforts.*

- Economic development in the DEIS study area has to do with the people and organizations themselves, not the need for a new highway. In the Roanoke, Salem, Vinton area, in excess of five economic development organizations are vying for the same companies. If the economic development organizations and the many government entities could cooperate instead of compete, economic development and growth would come to the region.

**Response:** *Comment noted.*

### **Miscellaneous**

- Many VDOT officials have been quoted in miscellaneous sources as saying that TSM is not a viable option and that it was only included because it was required by law. Why was the TSM option not fully thought out? Why did VDOT focus on making it a viable option? The law requiring its inclusion did not intend for it to be given lip service, but a real effort.

**Response:** *As stated in Section 2.5 (TSM Alternative), there is no law or regulatory basis for considering the TSM alternative. The impetus to consider a TSM alternative goes back approximately 20 years when significant advances were being made in computers and communication. Planners saw*

*TSM as an inexpensive solution for addressing congestion in urbanized areas while minimizing environmental impacts. Information on the purpose and intent of the TSM alternative is limited, with the only source being FHWA's Technical Advisory T6640.8A. The TSM alternative was intended to be a stand-alone alternative that completely addresses the purpose and need for the project by maximizing the efficiency of the existing transportation system. Consequently, it only consists of minor improvements with little work outside the right-of-way. Major improvements such as the addition of lanes, the wholesale correction of geometric deficiencies, or the reconstruction of an entire route would be considered a separate build alternative and not a TSM alternative. Therefore, the TSM alternative is a viable option in keeping with FHWA guidance. Comments by VDOT officials regarding the viability of the TSM alternative were likely made in the context of its ability to address the purpose and need of the project.*

- I have recently heard of a law that requires a bike path to be constructed in conjunction with any new highway in Virginia. Since every other state is rejecting I-73, it may become a Virginia highway anyway. I did not see a reference to such a path in the DEIS. In addition, VDOT needs to take Interstate Bicycle Route 76 into consideration in planning I-73. (I understand that when I-81 is widened that it will cross this route at least three times.)

**Response:** *Every other state is not rejecting I-73; an updated status of I-73 in other states is provided in the FEIS. In the states bordering Virginia – North Carolina and West Virginia- they are proceeding with the development of the roadway in their state. State law restricts the use of interstate facilities by pedestrians and bicyclists. On other functionally classified roadways, the inclusion of pedestrian and bicycle facilities is controlled by VDOT's Policy for Integrating Bicycle and Pedestrian Accommodations. Typically, on non-Interstate controlled access facilities, bicycle and pedestrians are not permitted where the speed and/or volume of traffic create unsafe conditions. As for Bicycle Route 76, this facility is located along existing roads in the project area. Because I-73 will either bridge existing roadways or provide an overpass for existing roadways, it will not bisect or cut off access to Bicycle Route 76.*

- I am in the path of the Western Corridor. I understand that pileated woodpeckers are on the endangered species list. We have pileated woodpeckers living in the wooded area in our neighborhood.

**Response:** *The pileated woodpecker (*Dryocopus pileatus*) is not a federally listed or state listed threatened or endangered species.*

- The public comment time was inadequate due to the following factors:
  - It began a week before Christmas.
  - VDOT was closed for several days during the public comment time that it would have been open under normal circumstances, i.e. Jan. 1,2 and Jan. 12, as well as, all of the holiday days off. This made it difficult for people to add comments and get questions answered along the way.
  - It is very unreasonable that the public comment time was not been extended to the degree that the DEIS was delayed in being released.

**Response:** *Documents were available for review on November 9, 2000. The comment period was open until January 12, 2001, giving interested parties over 60 days to review and comment on the document. This is 30 days above and beyond the 30-day regulation comment period.*

I appreciate the opportunity to comment.

Sincerely,

Sharon Dickenson  
6672 Christopher Dr.  
Roanoke, Virginia 24018  
sddicken@roanoke.infi.net



**WARREN  
TRUCKING COMPANY, INC.**

P.O. BOX 5224, MARTINSVILLE, VIRGINIA 24115, (540) 956-3181

January 12, 2001

Fred C Altizer, Jr.  
District Administrator  
Virginia Department of Transportation  
P O Box 3071  
Salem, VA 24153

Dear Mr. Altizer,

Since attending the Virginia Department of Transportation's public hearing on the Interstate 73 Location Study in Martinsville, on December 11, 2000, we have spent a great deal of time reviewing the various options contained on the Draft Environmental Impact Statement (DEIS). We have attempted to review these options from the perspective of transportation executives with over fifty years combined experience in the trucking industry, from the perspective of a Job Way steering committee member which I, Richard have had the honor of serving on and as citizens of Martinsville and Henry County. For all of the reasons that I, Richard, stated in my letter of August 13, 2000 to Lorinda Lionberger, (copy enclosed), I-73 is crucial to the future economic survival of Martinsville and Henry County, VA. Therefore, the "No Build" alternative is not an option and neither is the TSM option.

In an effort to fully capitalize on the economic development potential for our community a route on the eastern side of Henry County must be selected. As we understand it the promotion and expansion of economic development is federally mandated for the funding of interstate highways. There is an abundance of undeveloped land on the east side of Henry County, fewer residents and business would be displaced with an eastern route, and even further economic development would be fostered between Henry and Pittsylvania counties if a segment was routed through the eastern most portion of our county.

**Response:** *Comment noted. Expansion of economic development is not federally mandated for the funding of interstate highways. Instead, in identifying high priority corridors like Interstate 73, Congress found that those cities and locations that are not currently served by an interstate or comparable type facility do not experience a comparable level of economic development and prosperity as those that are served. Therefore, their finding related to economic development was one of their main reasons in designating I-73 a high priority corridor.*

In reviewing the various "DEIS" Build Alternatives that would route I-73 to the east side of Henry County it quickly becomes apparent that options 2, 2a, 2b, and 2c create a number of complications. Segments 398, 393, 349 and 390 which are included in all of options 2, 2a, 2b, and 2c would appear to disrupt and or displace a great number of residences and businesses from the North Carolina state line through Ridgeway, VA to the existing intersection of US 220 business and US 58 Bypass, including one of the oldest subdivisions in Henry County, "English Village". Additionally, the increase of interstate traffic on these segments would greatly congest and impede the flow of local transportation. Further, segment 391 would destroy US 58 Bypass as a "local bypass" which is critical to local industry and citizens as it currently provides for the efficient flow of "intra-county" traffic. If the current US 58 Bypass were to become part of I-73 as illustrated by segment 391 in Build Alternatives 2, 2a, 2b, and 2c two times each year the traffic on this interstate highway would come to a "screeching halt" as race fans arrived and departed the Martinsville Speedway. Current capacity is 81,000 at the speedway and it is growing every year. Easy access to the speedway must be maintained for race fans from the current US 58 Bypass so fans will continue to support our community's race events which infuse millions of dollars

annually into our local economy. Obviously this would cause chaos with the traffic flow on a major interstate highway.

**Response:** *All the build alternatives will displace residential and commercial facilities. However, the majority of these impacts are expected to occur where these alternatives pass through the City of Roanoke and its suburban area where development is more concentrated.*

*According to Section 4.1.11, VMT Comparison, Options 2 and 3 will have the advantage of absorbing more local travel due to their centralized location in the travel network. In addition, travel times for motorists within the study area is expected to decrease if the I-73 facility is constructed, Section 4.1.12.*

*Activities at the Martinsville Speedway typically fall outside of "peak" commuter periods. These events usually occur during weekends when background traffic volumes are typically lower than those experienced during weekday peak commuter periods. The addition of I-73 to the existing roadway network will serve to reduce traffic congestion currently experienced during these events. As a major interstate highway, the capacity will be greater than existing U.S. Route 58 or U.S. Route 220. However, the selected alternative will reflect a capacity less than that needed for these events. Typically, roadways are not designed for the highest traffic volumes experienced over a year or event traffic like that associated with NASCAR racing that occurs on a limited basis. "It would be wasteful to design on the maximum peak hour traffic of the year, yet the use of the average hourly traffic volume (50%) would result in inadequate design" (AASHTO). In urban areas, the standard design hour is the 30th highest hour. In recreational areas, a 100th highest hour is the standard design hour. Neither of these would reflect the highest hours experienced due to the Speedway activities.*

Additionally, segment 391 would destroy an upper end residential development, A Place in the Country, at the point at which it departs US 58 Bypass and heads northeast towards US 58 business. Property values in this neighborhood alone would exceed \$10,000,000, a cost factor that may not be accurately reflected in the DEIS as aerial photos appear to be dated and consequently do not accurately depict in detail the current situation. Additionally, options 2, 2a, 2b and 2c simply do not allow for the amount of economic development in Henry County that a corridor further to the east would provide.

**Response:** *Based on additional review, it does not appear the proposed alignment of Segment 391 will result in the displacements of any residences associated with the "A Place in the Country" subdivision.*

In summary, options 2, 2a, 2b and 2c would result in the "unnecessary" disruption and displacement of many residences and businesses, which are vital to our community. These options would eliminate our local bypass which we must preserve. They would be detrimental to the flow of local traffic and commerce within our county. And finally, these "Build Alternatives" simply would not allow Martinsville and Henry County to fully capitalize on the availability of land necessary to stimulate economic development.

Therefore, the only Build Alternative options that truly make sense for Martinsville and Henry County, VA are options 1 or 1a with minor modifications to both options. By shifting segment 333 on options 1 and 1a southeast towards the Pittsylvania county line the opportunity for collaborative efforts in economic development between Henry County and Pittsylvania County would be greatly enhanced. Also, the shifting of segment 333 southeast towards the county line would create access to more available undeveloped land. Additionally, there have been many environmental concerns expressed regarding the reduction of water shed into Leatherwood Creek and Tanyard Branch. It has been suggested that by shifting segment 333 a minimum of one mile southeast between route 650 and US 58 business a further reduction of water shed into these creeks would be minimized as a result of the interstate construction. It is also imperative that an interchange be included in both options near the intersection of I-73 and Barrows Mill Road near the Patriot Centre, the areas largest industrial park.

**Response:** Section 2.6, Build Alternative, states that Segment 333 will be served by four diamond interchanges located at U.S. Route 58, Henry County Route 650, Virginia Route 87, and U.S. Route 220. At this time, the location and type of interchange is tentative and based on preliminary information that is subject to change during final design as traffic data is updated.

All build alternatives require a general Virginia Pollutant Discharge Elimination System (VPDES) permit for construction activities affecting greater than 5 acres and an approved erosion and sediment control plan. With implementation of appropriate mitigation measures and BMP's, the long-term operation and maintenance of the build alternative options is not expected to result in adverse impacts to public water supplies, water-related recreational opportunities, or aquatic habitat values due to degradation of water quality

In conclusion, we respectfully request that the Virginia Department of Transportation recommend to the Commonwealth Transportation Board either Build Alternative Option 1 or Option 1a along with the above modifications to segment 333 and the Barrows Mill Road interchange. These options properly modified will provide the greatest opportunity for economic development for Martinsville and Henry County while protecting our current local infrastructure. They also will provide the best balance and flow of ground transportation for both interstate commerce as well as intra-county commerce. And last but certainly not least, Options 1 and 1a would prove to be less disruptive and injurious to the lives and businesses in Henry County than the other Build 1 Alternatives in Henry County.

**Response:** Comment noted.

Sincerely,

WARREN TRUCKING COMPANY, INC.

Richard H. Eanes  
Executive Vice President

E. R "Buddy" Eanes, Jr.  
President

RHE/ERE/dk

Cc:  
Lorinda G. Lionberger  
Commonwealth Transportation Board  
P O Box 20209  
Roanoke, VA 24018-0507



**PREPARED STATEMENT**  
**of**  
**David and Joyce Foster**  
**342 High Street**  
**Salem, VA 24153**  
**to**  
**Virginia Department of Transportation**  
**Public Hearing on 1-73**  
**Hotel Roanoke**  
**Roanoke, Virginia**  
  
**December 13, 2000**

**Introduction and Summary**

These are the prepared remarks of David and Joyce Foster, 342 High Street, Salem, Virginia and are submitted at the Public Hearing advertised for Hotel Roanoke, Roanoke, Virginia, on December 13, 2000.

The format of these comments follows the outline below:

- I. The Flawed Process for Public Involvement
- II. A Legacy of Unwanted Projects
- III. Inadequate Evaluation of Alternatives and Project Justification
- IV. 1-73 Proposal Follows Familiar Pattern
- V. TSM in the U.S. 220 Corridor

We are highly critical of the flawed process in Virginia for determining which highway projects are needed and should go forward. This process is dominated by the Commonwealth Transportation Board, in turn dominated by development, real estate and business interests. True opportunities for citizen

input to this process are non-existent, and the lack of real vision and assessment of alternatives has resulted in a parade of unwanted, poorly-conceived, hugely expensive highway proposals being inflicted on this part of Virginia in recent years. In addition to being required to support all this with our taxes, we are

further required, at great time and expense, to organize and lobby continually to defeat unrealistic, unenlightened, politically inspired highway proposals, which further sap the limited funds all towns and counties need so badly to pursue legitimate local and regional road improvement projects.

1-73 is no different. It is what we have come to expect from VDOT. There is no justified need for the road. Its impact on our environment, on our homes or businesses, and on our way of life threatens to be severely negative, with no concurrent benefit.

We recognize the legitimate need for transportation improvements in the Roanoke - Greensboro corridor. Accordingly, we support the Transportation System Management (TSM) concept as applicable to U.S. 220. Many other routes in Virginia, such as U.S. 460, have undergone great improvement with

minimal cost and disruption employing this approach. Over the near term, we recognize the 1-581 link between and improved U.S. 220 and 1-81 as adequate, but planning should proceed concurrently with U.S. 220 improvements on a future non-urban, four-lane connector, most plausibly on the east side of the Roanoke metropolitan area to accommodate north-south traffic growth.

**Response:** *Comments noted. Transportation projects often originate at the local level through the comprehensive planning process or through needs identified by local governments who then work with their state and federal representatives to advance the projects. In urbanized areas, Metropolitan Planning Organizations also play a role in the decision of what projects get programmed and funded when they develop Transportation Improvement Programs and Long Range Transportation Plans. When VDOT develops its Six-Year Allocation Program, which is a listing of projects that they intend to develop and fund over that time period, public hearings are held in each of VDOT's nine districts. Recently, when the allocation hearings were held in the Salem District, several people spoke on I-73. As for the role of the CTB in the transportation decision-making process, their role is codified in state law. While VDOT is often blamed for highway projects, projects like I-73 are not conceived by them. It was the U.S. Congress that designated I-73 as a high priority corridor through the passage of law and made the tax payers money available to states like Virginia to study the project further.*

### **The Flawed Process for Public Involvement.**

The current process in Virginia for public involvement in future highway decisions is badly flawed.

Workshops and public hearings are held, of course, many of them required by law. But real opportunities for public influence over highway decisions in the state are nonexistent. Long before the public is invited to comment, all pivotal decisions have already been made. Citizens arrive to find exhibits showing proposed routes, lands required for new right-of way, the number of lanes, interchange locations, and similar details.

These are mere engineering details. Once a decision is made to build a major new road, or enlarge an existing road, there is little doubt that engineers can devise the steps necessary to make the construction a reality. Public comment during such steps can be useful, but is hardly determinative.

We need ways for broad public "visioning" input, *before road-building decisions are made*. What are our future transportation needs? How can they best be met? If additional highway capacity is justified, should new roads be built or existing roads modified? Are decisions being driven by capacity for more trucks? How can car and truck traffic be managed for a shared roadway? Such questions are pivotal to justification and design of new highways, yet the public has no role in such determinations.

The currently flawed process, which precludes meaningful citizen participation in the key decision-making procedures by which road projects are identified and selected, has produced, consistently and predictably, unwelcome consequences.

Virginia Department of Transportation has inflicted, at least on this part of the commonwealth, a legacy of unwanted road projects, which citizens must then organize and commit time and money to defeat. Tragically the same citizens, must often organize and lobby for road projects that they truly want and need, but which are often delayed for years and years due to scarce highway funding.

This flawed process is also characterized by lack of examination of true alternatives and lack of any sense of project justification. The public sees the projects, fully formed, being cast down from on high by VDOT officials with no real sensitivity for what the people want and need, or how they see their future road needs best being achieved.

We examine some of these consequences of the badly flawed process in more detail in the sections that follow, and evaluate the 1-73 dialogue in the context of these shortcomings and limitations.

## **II. A Legacy of Unwanted Projects.**

Failure to consider and involve input from the public at an early formative stage in highway planning has resulted in poorly conceived highway proposals being imposed on our area, which are largely incongruent with the preferences and priorities of residents. These highway proposals issue from the Commonwealth Transportation Board, staffed largely by developers and contractors. Evidently their dream for the future of Virginia is to build new roads everywhere under the mantra of economic growth and development.

The tragic failure of this approach is not only that highway construction is hardly a proxy for prosperity and may even threaten our way of life, but that the pell mell pursuit of new roadbuilding jeopardizes the much more modest yet legitimate highway needs of towns and counties across Virginia.

In recent years we have been forced into protracted campaigns to oppose the Smart Road and the eight-laning of 1-81 through the Roanoke Valley and now the proposed 1-73. These are huge projects, requiring many millions of dollars. At the same time, needs such a new bridge over the river or railroad tracks, or improvements to a congested roadway or intersection, cannot proceed without endless bureaucratic roadblocks and six-year plans, even though the cost by comparison is tiny and its public acceptance is widespread. Citizens are told that we have to wait for funding to become available!

This suggests a chronic disconnection between centralized highway planners and citizens around the state. The process must be restructured to align more effectively the decisions of planners and the needs and priorities of citizens. Reform is paramount and is critical to ensuring reasonable, responsible allocation of highway dollars in Virginia through thorough evaluation of alternatives.

**Response:** *Back in the early 90s, when it became apparent that the Congressional routing of Interstate 73 included in the Intermodal Surface Transportation Efficiency Act would likely impact Virginia, VDOT initiated a feasibility study to define the general location of I-73 in Virginia instead of having it dictated to them by the federal government. As part of this effort, a series of Citizen Information Meetings were held to solicit input. Once a decision was made on the general location of I-73, a draft EIS was initiated. In developing the draft EIS, the broad range of options to be considered was developed through input from several sources: public input received during a series of open house meetings, input from local jurisdictions, stakeholder interviews, and input from the I-73 Study Team (the I-73 Study Team includes VDOT staff and VDOT's consulting staff for this project). Open forum Citizen Information Meetings for the region were held in the City of Martinsville, the Town of Rocky Mount, and the City of Roanoke. Over 1,200 citizens attended these meetings at which attendees were asked to suggest alternatives. For those who had a preference for a Build Alternative, a map was provided and the attendees were asked to draw alternative routes. The Study Team received over 750 Build Alternative suggestions from the public. Other alternatives received from the public included requests that nothing be done at all relative to a new Interstate, known as the No-Build Alternative, or that existing U.S. Route 220 be improved but not to interstate standards, known as the Transportation System Management (TSM) Alternative. In summary, the suggested alternatives included:*

*No-Build Alternative*

*Transportation System Management (TSM) Alternative*

*New Interstate I-73 (Build) Alternative*

*The No-Build Alternative and the TSM Alternative received equal consideration during the environmental analysis and in the DEIS. The Build Alternative, in addition to new location options, includes an option to improve existing U.S. Route 220 to interstate standards.*

*Each of the individual Build Alternative options suggested by the public was transferred to a composite map representing all options received. Due to the number of options received, the scale of the maps used to solicit comments and the similarity of many of them, the options shown on the composite maps are representative of all of the options received.*

*In addition, the Franklin County Comprehensive Plan contained two options and stakeholders identified several more through their interviews. The Study Team options were generated by reviewing topographic mapping and considering elements such as topographic constraints, river crossings, and impacts to development.*

*The different composite maps that were developed as a result of this effort were then combined into a single map and those options that were already represented were eliminated. The resulting map of options represented the broad range of options that were developed through the public involvement process.*

*The options were then broken into segments to allow for elimination of those segments that were unsuitable for further study while retaining portions of the options that merited further consideration. The broad range of options included approximately 370 individual segments. The segments were generally numbered consecutively beginning in Roanoke and moving south towards North Carolina. As additional segments were added from various sources later in the process, they were taken into consideration. Some of the segments were further split where they intersected other segments. Then, using a variety of factors (see Section 2.2.2 of the draft EIS), the pool of segments were reduced to a manageable number which were then combined into the alternatives considered in the draft EIS.*

*Citizen input is just one of many factors that is taken into consideration when making a transportation decision of this magnitude. As mentioned above, local governments and officials also have an influence in decision-making. Environmental issues, impacts, and constraints are other factors that must be balanced with public input when arriving at a decision. Therefore, although a citizen may not feel that their input directly influenced the outcome, their comments were considered. Whenever you have a project where those providing input into the process hold opposing viewpoints, some will inevitably disagree with the decision that is made.*

*Finally, providing input is not the only reason for the public involvement process. The public involvement process is also an effort to get the public involved in the development of the project by providing them information on such issues as: 1) VDOT's project development process; 2) the status of the project; and 3) the project's purpose and need, social/economic/environmental impacts, location alternatives, design features, etc. Public involvement also provides VDOT with the opportunity to assist the public with interpreting project plans and drawings as well as give the public an opportunity to ask questions one-on-one.*

*The fact is that few citizens elect to get involved in the transportation planning process when decisions are made on what projects to advance for further development. Most citizens don't want to get involved in a project until VDOT has drawn a line on a map and can tell them what impact the project will have on their property.*

*At this time, VDOT has not identified funding for the construction of I-73, and the funding that has been spent on I-73 is money that the U.S. Congress set-aside for the corridor. Therefore, other projects are not being delayed in order to study I-73. Projects are delayed because of an overall lack of transportation funding at the state level requiring the CTB to make difficult choices regarding transportation priorities.*

### **III. Inadequate Evaluation of Alternatives and Project Justification.**

Citizens cannot get true answers to important highway questions at workshops and hearings. Oh yes, we can find out exactly where the proposed road will go, alternatives for acquiring needed land, how many homes or businesses will be affected, and details about traffic lanes and interchanges, but answers to more basic salient questions are never available.

"Why do we need the Smart Road?"

"It will cut four minutes off the trip between Roanoke and Blacksburg."

New highways will always cut travel time between end points, so this says nothing to justify this particular segment at this cost in this place at this time.

"Why does I-81 need to be widened to eight lanes?"

"Traffic projections indicate that by 2025 the capacity will be needed."

More traffic always requires greater capacity, so this, too, is unenlightening. It says nothing about why this plan was selected over, for example, diverting trucks to a rail ferry operation, or making use of underutilized capacity on parallel U.S. 11, or other possibilities that likely were never considered.

### **IV. I-73 Proposal Follows Familiar Pattern.**

Now we're told we need I-73. Why? As part of an Interstate Highway route between Detroit and Charleston, SC. Of course there are already various Interstate routes available to complete easily an auto trip between those points, so that, too, says nothing by way of justification.

"Why another road?"

"Whose idea is this anyway?"

"Where is the citizen outcry demanding such a project?"

"Why must it come through the Roanoke Valley, even though it is out of route?"

"What justification can there be for the financial and environmental cost of the extra miles?"

Answers to such questions cannot be found at workshops and hearings, because the I-73 project has no sound justification. It is a political boondoggle. - The whole thing would be laughable *if it were not for the tragically real adverse impact I-73 portends for our quality of life.*

**Response:** *The purpose for the Congressionally designated National Highway System (NHS) "priority corridors" is to link regions and support economic growth in areas that have not traditionally been served by interstate facilities or comparable type highways. Economic growth in the cities, towns and counties along U.S. Route 220 has and continues to be constrained by the limited transportation access to major markets and suppliers. U.S. Route 220 safety issues, (its present geometric configuration, the uncontrolled access and the high percentage of truck traffic on the road) have resulted in transportation deficiencies that require timely consideration and resolution. The I-73 Location Study is intended to identify and evaluate potential solutions to the economic, safety needs and transportation deficiencies of the study area. The location study process provides a basis for selecting an alternative to meet these goals.*

*The purpose and need for the I-73 project is stated in Section 1.2 of the document. The I-73 project is intended to: 1) provide safety improvements along the U.S. Route 220 study area, 2) support economic development both locally and regionally, 3) improve access and capacity, 4) enhance mobility, and 5) address the Congressional intent to establish I-73 as a high priority highway to link the nation's regions and support economic growth.*

#### **V. TSM in the U.S. 220 Corridor.**

Notwithstanding the foregoing negative comments about the I-73 proposals, there emerges a legitimate transportation improvement need in the Roanoke-Greensboro corridor. If the current proposals were to be limited to a focus on improvements in the U.S. 220 corridor, there would, we suspect, be much stronger public buy-in and far less opposition. While I-73 is totally unnecessary, citizens in this area would more readily embrace the goal of improving U.S. 220 between Roanoke and the North Carolina line to tie in with similar improvements made and ongoing in that state. Accordingly, the transportation system management (TSM) alternative makes sense.

Traffic using I-81 today between New York and Pennsylvania points and the South as an alternative to the more congested I-95 Eastern Seaboard route needs to leave I-81 in the Roanoke vicinity, because after that I-81 trends too far westward. North Carolina has already upgraded the U.S. 220 corridor through that state to Rockingham, near the South Carolina border, whence U.S. 74 affords a reasonable connection with I-95 south of Lumberton.

It is sensible that Virginia do its part to upgrade and promote this corridor by improving U.S. 220. This does not require an Interstate caliber highway, but something more akin to the earlier upgrades of U.S. 460, 29, and 58 where travel has been greatly facilitated by gradual elimination of at-grade intersections, development of urban bypasses, and four-laning remaining two-lane portions.

Improvements can be prioritized to provide the greatest improvements and safety enhancements at lowest cost first (e.g., alignment improvements, elimination of steep grades and sharp curves, bottlenecks in towns), continuing with more difficult and expensive improvements such as interchanges as time and funding permit.

Short term the I-581 connection between I-81 and U.S. 220 is adequate, but longer term will require a new east-side bypass of the Roanoke urban area to lead directly to U.S. 220 without passing through downtown. Planning for this eventuality should progress simultaneously with the start of physical improvements to U.S. 220.

VDOT should focus on these projects with real value to Virginia and support by local residents. Abandon the whole notion of I-73. If it has to go through Virginia with that number, let it follow I-77, which, followed between the Akron, OH area and Columbia, SC, *provides the most direct route already.*

**Response:** *TSM improvements will enhance safety on existing US Route 220. TSM will not however bring all of US Route 220 up to current VDOT or AASHTO design standards for roadways currently classified as urban or rural principal arterials. Implicit in that standard is the improved safety features that accrue with the horizontal and vertical geometry of a principal arterial. TSM improvements would not assure that US Route 220 could achieve the safety level of a divided arterial highway design*

*In the long run true safety benefits, which include fatalities, bodily injury and property damage, are enhanced with the proposed interstate alternative. An interstate facility provides significant accident rate reductions over the conventional urban and rural principle arterial. According to statistics compiled for the year 2000, the National Highway Traffic Safety Administration indicates Virginia's interstate system has a fatality rate of 66 deaths per 100 million vehicle miles traveled in rural areas whereas principal arterials have a fatality rate of 102 deaths per 100 million vehicle miles traveled. In terms of saving lives, an interstate facility reduces fatalities by 35.3%.*

*TSM would not rebuild many miles of US Route 220. The TSM ranges from 10.76% to 13.19% of the cost for the full build options. The TSM improvements affect approximately 86,600 LF of US Route 220 from Roanoke to the North Carolina line. This represents 30.8% of the 281,000 LF of US Route 220 from Roanoke to the North Carolina state line. The 86,600 LF of TSM improvements to US Route 220 include an array of minor and major improvements ranging from additional left turn lanes, the closing of median crossovers, signal improvements, shoulder widening to major grade and pavement replacement. TSM is a series of spot improvements that address immediate safety needs along 16.4 miles of roadway*

*The TSM alternative lacks convincing components of the I-73 purpose and need such as:*

*TSM will not enhance the functional classification of US Route 220,  
TSM will not increase capacity of the entire US Route 220 corridor, nor will it improve the level of service,  
TSM will not improve mobility and access between Virginia and other regions,  
TSM will not attract the economic activity of an Interstate facility,  
TSM does not address the Congressional intent in the TEA 21 highway reauthorization act.*

*As a \$146 million alternative TSM is not a low cost alternative for scattered improvements to 16.4 miles of rural principal arterial highway. TSM is questionable in terms of its operating benefits and characteristics when compared to the more aggressive interstate alternatives.*

*In addition, public opinion during the public hearing process was widely dispersed in Franklin County and the remaining study area. During the hearing and post-hearing period, 8,669 citizens from the counties of Roanoke, Bedford, Botetourt, Franklin and Henry and the Cities of Roanoke, Salem, Rocky Mount, Martinsville and Danville responded to the I-73 project through written comments, signed petitions, sent letters, gave oral testimony at the hearing, sent e-mails or comment sheets from December 11, 2000 to January 12, 2001. Petitions represented 46% of the respondents and form letters represented nearly 8% of the respondents. Discounting the petitions and form letters and looking at the remaining 46% of the respondents who took the time to write a letter, send an e-mail, fill out a comment sheet or provide testimony at the hearing, 270 participants supported a No Build Alternative, 1,977 respondents supported the TSM alternative and 1,972 citizens supported a new build alternative. When asked the straightforward question "Do you support the project?" 2,517 respondents logged in a yes and 1,138 logged in a no.*

*In Franklin County, 205 respondents took the time to provide written comments at the public hearing on December 12, 2000. Of those 205 respondents 202 answered the question "Which alternative best fulfills the need?" as follows; 27 responded No Build, 101 responded TSM and 74 responded New Build Alternative. During the formal hearing that same evening, 71 speakers provided their input. Nine of the speakers supported a No Build Alternative, 24 supported TSM and 38 supported a New Build Alternative.*



I-73 REGIONAL IMPACT NETWORK

January 12, 2000

Mr. Earl T. Robb  
State Environmental Administrator  
Virginia Department of Transportation  
1201 East Broad Street  
Richmond, VA 23219

Dear Mr. Robb,

I spoke at the I-73 Public Hearings in Roanoke on December 14. But three minutes does not allow enough time to comment completely. Please add these to my comments concerning the Draft Environmental Impact Statement for I-73.

Purpose and Need for Action

The fifth Purpose in the Purpose and Need section refers to Congress's intent for this to be included in the interstate system. This "purpose" surfaced only in the final months of DEIS process. It was not part of the Purpose and Need drafted in 1998 or the six years of planning prior to November 2000. As a NHS road, I-73 can clearly be constructed to a lower standard than interstate. In fact West Virginia has chosen not to build their section to interstate standards. Why has Virginia determined that Congress has intended I-73 be constructed to interstate standards? And why has this purpose only appeared now?

**Responses:** *The draft EIS speaks to Congressional intent and acknowledges the flexibility provided by Congress by stating, "...[Congress] has not ruled out other design standards such as that for other principle arterials...(draft EIS 2-6)." The context in which this verse appears in the draft EIS is in a context which states that FHWA believes that the designation by Congress of "I-73" indicates the congressional intent that this route would be an Interstate highway. Further reinforcing this intent, Congress has amended existing legislation and passed additional legislation designating the section of I-73 from Charleston, South Carolina to Portsmouth, Ohio as a future part of the Interstate system subject to the conditions that the section to be added meets Interstate design criteria and connects to an existing Interstate segment. Although this does not rule out other design standards which some states are pursuing, those decisions are left to the individual states. Therefore, even though Congress has provided the states with flexibility, they have expressed their intent through legislation as referenced above and have provided states with the legal mechanism to designate the route as part of the Interstate system should they meet the conditions noted. Accordingly, the draft EIS identifies the Interstate design standard as the "preferred design alternative" for I-73 in Virginia in keeping with the documented purpose and need which includes congressional intent. Notwithstanding, the draft EIS further clarifies that the Interstate design is being used to assess impacts and compare alternatives for purposes of selecting a location, a worst-case scenario if you will; the actual design and design related features won't be approved until after final design which cannot be initiated under FHWA regulations until after a Record of Decision is issued. The draft EIS further points out that because the facility would be part of the NHS and would either improve existing Route 220 or effectively replace Route 220 on the NHS system, it would need to be designed to principle arterial standards since Route 220 is functionally classified as a principle arterial route. The draft EIS goes on to compare the design standards for a principle arterial freeway (i.e. interstate facility) and a principle arterial non-freeway demonstrating that there is virtually no difference between the footprint that would be required whether the facility is designed to be added to the interstate or not. As for West Virginia, they are designing Route 73 in their state to interstate standards for mountainous conditions with the exception that they will initially construct*

*at-grade crossings instead of grade-separated crossings. Accordingly, they will not be able to post the interstate shield.*

*The fifth purpose, 'Congressional Intent', was added to the project in response to suggestions provided by agencies in their review of the Pre-Draft EIS. EPA and COE requested that the justification for an interstate facility be clarified in the DEIS. Congressional Intent was an obvious but overlooked purpose for the project when the original purpose and need statement was drafted. Consequently, it was added before the DEIS was made available to the public in November, 2000.*

#### Economic Development Conditions (1.4)

The economic benefits of a new-terrain interstate highway are far from a given. A number of studies indicate that the cost/benefit ratio for new rural highways has been declining significantly since the 1960s. The main study cited in the DEIS looks at economic development in a very limited sense. An Economic Impact Analysis of the Potential Interstate I-73 Corridors performed by the Virginia Employment Commission only addresses interchange jobs. It states: "Predicting the effect of a proposed interstate on economic growth is a difficult task. Economic development is dependent on many other factors. In addition to transportation a firm's location decision is influenced by other factors such as labor availability and cost, skill level, education and training, and physical space. Predicting business and mall development stemming from a proposed interstate is an insurmountable task."

NEPA regulations recommend that a benefit/cost analysis be incorporated into a DEIS if it is relevant to the decision-making process. Since economic development is one of the purposes and needs cited for this highway, a benefit/cost analysis needs to be performed for each of the alternatives proposed, including the TSM alternative

**Response:** *The economic benefit and development potential of interstate or comparable type facilities is not only based on the Congressional finding in designating high priority corridors, it is also based on the basic premise that improved access attracts business. This has been generally verified by the reports cited in the draft EIS. Notwithstanding, the direct capital costs of constructing each alternative have been estimated and are documented in the DEIS as well as indirect costs such as lost tax revenue resulting from business displacements and farmland impacts. In addition, a benefit-cost analysis was performed on the location corridor selected by the CTB, and this information is included in the final EIS. The results of this analysis demonstrate that the benefit-cost of the facility in rural areas will be much lower than the benefit-cost of the facility in developed areas. This follows logically because traffic is greater in developed areas and it has the supporting infrastructure and population to more readily accommodate economic development than rural areas do. Therefore, the benefits of the project are greater compared to cost in the northern end of the project than in the southern end which is more rural. Additionally, qualitative comparisons can be made with the other alternatives that were considered by examining the cost of each alternative, its length, the number of interchanges, and the number of vehicles predicted to use the facility. Generally speaking, the alternatives that carry the greater number of vehicles and has the greater number of interchanges are the alternatives that will have a higher benefit-cost ratio.*

#### Natural Resources and estimates concerning Option 4.

The Piratebush is an endangered species growing in steeply mountainous terrain along Option 4. It is stated in the DEIS (section 4.7.5.2.2) that Segment 371 of Option 4 was aligned to avoid known populations of the Piratebush. It is also acknowledged that a stand of the Piratebush has been discovered since the initial alignments were established and these will have to be taken into account at a later date. Given that this is the case, and the Piratebush only grows on the higher elevations and ridgelines, any change in the proposed alignment to avoid the Piratebush must move the road to lower elevations.

Any change in this corridor will directly affect many of the analyses upon which VDOT is basing its comparisons, especially the number of homes and businesses taken, cost of construction, and energy to construct, as well as length, vehicle miles traveled and vehicle hours traveled. In fact, knowing that Section 371 of Option 4 must be adjusted negates many of the comparisons the DEIS is designed to address.

**Response:** *Piratebush (Buckleya distichophylla) is not a federally listed threatened or endangered species and as such, not protected under federal law. Consequently, no Section 7 consultation is required with FWS under the Endangered Species Act. Although it is a state listed endangered species, the Virginia Endangered Species Act only requires state agencies to cooperate with the Virginia Department of Agriculture and Consumer Services or the Virginia Department of Game and Inland Fisheries as the case may be. The Act does not restrict VDOT in carrying out construction activities nor preclude them from pursuing an alternative that impacts the Piratebush. Therefore, to say that Section 371 "must be adjusted" is not entirely correct. Despite the limited authority of the Act, VDOT will take all practicable steps to avoid or minimize impacts to the species should Option 4 be advanced. This coordination would take place during the Virginia Joint Permit Application process.*

*Further, the impacts in the EIS are based upon 600-foot location or analysis corridors even though the actual construction footprint of the roadway would be much narrower. This was done in part to allow designers to shift the roadway's alignment during final design in an attempt to minimize impacts or avoid environmental resources all together. Therefore, shifting the alignment does not necessarily negate the analyses that VDOT conducted. A shifted alignment could still fall within the 600 foot location corridor considered in the EIS.*

*Finally, the NEPA regulations establish re-evaluation procedures for addressing new information that arises during the course of project development. The consideration of new information does not automatically negate previous decisions or comparisons.*

#### Land Use

Page S-8 of the Executive Summary addresses resolutions adopted by local governments. In August 1998 Salem City Council adopted a resolution condemning the entire location study. The Roanoke County Board of Supervisors passed a number of resolutions in opposition to the Western alignment of I-73 and for the Central alignment. In response to a query from one of our members, Brenda Holt, Secretary to the Roanoke County Board of Supervisors, sent us the following e-mail:

At their meeting on 9/8/98, the Board voted three to two to approve resolution supporting the I-581 and Route 220 South Corridor for I-73 through the Roanoke Valley. Copies of the resolution were sent to the Va Dept of Transp, and the I-73 Communications Committee of the General Assembly. Quoting from the resolution "...strongly reiterates it prior recommendation to build I-73 and that the selected corridor for I-73 immediately follows the existing corridor of Route 220 into the City of Roanoke, and then overlaps Interstate 581, Interstate 81, the proposed "Smart Highway" and Route 460 to the West Virginia state line near Narrows."

Also, sections 3.2.8.1 and 3.2.8.3 address land use, transportation policy, farmlands and forestry preservation policies. Although the Roanoke County Comprehensive Plan does not address an alignment for I-73, it does speak specifically about the area of the County where an interchange is planned. Poage's Mill Farm is named as an important landmark to be preserved. This is the location of the interchange with I-73 and U.S. 221 and would be destroyed by the interchange. In addition, the following is taken from the Roanoke County Comprehensive Plan:

#### Community Values:

##### Key Resources:

- The views of Mount Chestnut, Masons Knob, Bent Mountain and other ridgelines as seen from U.S. Route 221.
- The views from the "Horseshoe Curve" along U.S. Route 221 and the Blue Ridge Parkway.

Natural Resources

- Recognize and respect and work with private property owners in order to preserve the rural lifestyle and protect the rights of property owners.

Land Use

- Design principles should enhance and protect the rural lifestyle of the community.
- Prevent the use of strip linear commercial development along the U.S. 221 corridor. This type of development has large un-screened parking areas, many access points to the main road, numerous detached buildings of varying architecture, and high light poles adding light pollution to the evening sky.

The planned elevated interchange would interfere with the views described here. And certainly an interchange this close to the City of Roanoke will foster commercial development and affect the rural lifestyle of the Back Creek area. These induced impacts run in direct opposition to the intent of the Roanoke County Comprehensive Plan.

**Response:** *Your comment reflecting the views of the City of Salem and Roanoke County are noted.*

Visual Quality, Segment 371, Option 4 (4.5.4.12)

The table for Option 4 Visual Impact Rating (4.5-12) shows segment 371 to have an average score of -5.22 for Visual Impact of the Road, yielding a rating of Medium. When averaged with all the other ratings, Option 4 has a visual impact of 4.72 or Low. In a straightforward numerical analysis, these averages are correct. But in truth, certain areas of high impact will have an exaggerated adverse effect. These mountains dominate the skyline of the Roanoke Valley and much of this segment is visible from most of Roanoke and Salem.

The landscape ratings for a number of sections (A-28, Visual Quality Technical Memorandum) show that their existing visual quality are high, moderate high or very high. With segment 371 constructed, their visual quality drops to moderate or moderate low. The visual quality change is generally substantial adverse and the visual impact scores run from -4 to -10 substantial adverse.

Although these sections of segment 371 are a small portion of Option 4, they have a tremendous impact on the Roanoke Valley, the most populous area traversed by I-73. If increased tourism is a stated goal of the Purpose and Need, and most existing tourist destinations are in sight of this corridor, desecrating the viewshed of the Roanoke Valley should be addressed more directly by the DEIS.

I would expect that these inconsistencies be addressed fully in a supplemental DEIS, especially if Option 4 is recommended as the corridor of choice.

Sincerely,

Alan H. Gleiner

**Response:** *The Visual Impact ratings in the DEIS were developed to provide a quantitative comparison of the visual impacts among alternatives. The DEIS and Visual Quality Technical Memorandum recognize the high visual quality and visual impacts that would occur in these sections of Segment 371 and Option 4, both quantitatively and qualitatively. The Visual Quality Technical Memorandum describes the characteristics of this area on page 4-18. An attempt is made to depict for the reader the high scenic qualities of this area. "The northern end of segment 371 would follow the*

*tapering Great Valley landscape region to its very narrow intersection with I-81 in the Dixie Caverns area. The segment would rise to a high point on the north flank of Twelve O'clock Knob before turning due west, crossing small drainage basins. It is generally wooded on the Twelve O'clock Knob toward the top of the mountain. The segment would cross small settled valleys before reaching the Roanoke River. Again climbing on a ridge, it would almost touch the Roanoke River a second time before its terminus where the Fort Lewis Mountain closes on Poor Mountain, creating the western Roanoke River basin. Topography of this segment generally falls from south to north, sloping toward the city of Salem, providing dramatic vistas of the Great Valley along several areas of the segment." In addition, impacts are described qualitatively that help the reader frame the degree of impacts in this location, "The amount of cut and fill that would be required to align an interstate highway on the western mountain range of the Roanoke Valley would create high visual impacts in some areas. Similar impacts would occur in areas south of U.S. Route 221."*

*All Build Alternative Options cross the Blue Ridge at different locations and would incur visual impacts in different locations. The visual impacts were totaled for each option in its entirety, but this information is included by segment and by landscape unit in order for the reader to get a better sense of the varying degrees of impacts along each 70+ mile corridor. It is up to the reviewer to formulate their own values and opinions regarding the impacts of each option using the information presented. For example, the analysis does not require that the reader give equal rate to both the rating for "the view of the road" and "the view from the road". It is expected that most people impacted by the project will give greater deference to the rating for "the view of the road".*

