

# **APPENDIX H**

## **I-73 DEIS REEVALUATION**





# COMMONWEALTH of VIRGINIA

DEPARTMENT OF TRANSPORTATION  
1401 EAST BROAD STREET  
RICHMOND, VIRGINIA 23219-2000

PHILIP A. SHUCET  
COMMISSIONER

MOHAMMAD MIRSHAHI, P.E.  
STATE LOCATION AND DESIGN ENGINEER

June 22, 2005

Mr. Roberto Fonseca-Martinez  
Federal Highway Administration, Virginia Division  
400 North 8<sup>th</sup> Street  
Richmond, Virginia 23240

Re:      Reevaluation: I-73 Location Study  
        UPC Codes:            16596  
        State Project Number: 0073-962-F01, PE101  
        FHWA EIS Number:    FHWA-VA-EIS-NH-962-2 (004)  
        DEIS Date            October 25, 2000

Dear Mr. Fonseca-Martinez:

The Virginia Department of Transportation (VDOT) has concluded its reevaluation of the above referenced draft EIS. The alternative selected for the I-73 Location Study (I-73) is the alternative identified in the FEIS as the Adopted Location Corridor (ALC) (see Figure 2.6-6 on page 2-69 of the FEIS). The development of the ALC has continued to evolve over a four year period since the DEIS was initially distributed in October 2000. A summary of that development history is provided below:

1. In May of 2001, the Commonwealth Transportation Board (CTB) adopted a location alternative for the ALC consisting of segments 374, 376, 287A, 399, 400, 153, 326B, 326, 387, 388, 389, 349, 393, and 398. Additional segments 118 and 118B were included in the ALC to afford a connector to existing US Route 220. All of these segments were documented in the DEIS dated October 2000.
2. A month later on June 21, 2001 the CTB rescinded its May I-73 location decision. After reconsideration, the CTB selected a revised ALC consisting of segments 374, 376, 287A, 399, 400, 153, 202A, 385, 369, 373, 333 and 398. Additional segments 118 and 118B were included in the revised ALC to afford a connector to existing US Route 220. The revised ALC responded to economic development concerns voiced from Henry and Pittsylvania Counties as well as reduced impacts to wetlands, water supply facilities, special habitats, residential relocations and commercial relocations.
3. In November of 2002, the Keeper of the National Register of Historic Places determined that a large urban neighborhood in downtown Roanoke (Southeast Roanoke Neighborhood) was eligible for the National Register as a historic district. The ALC ran through and severed the Southeast Roanoke Neighborhood Historic District. The FHWA and VDOT spent the remainder of 2002 and much of 2003 appealing the decision of the Keeper and simultaneously evaluated avoidance alternatives related to the Southeast Roanoke Neighborhood Historic District.

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June 2005

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4. The appeal to the Keeper to reconsider the Southeast Roanoke Neighborhood Historic District was unsuccessful, and VDOT's evaluation of avoidance alternatives did not identify any practicable and feasible alternatives in the immediate vicinity of the ALC. As a direct consequence of these developments, the FHWA informed VDOT that it did not appear that the legal standards established by Section 4(f) would allow them to support the ALC and more specifically, the segment of the ALC that impacted the Southeast Roanoke Neighborhood Historic District. Accordingly, VDOT elected to advance segments of an alternative, which had previously been studied in the earlier DEIS. On July 15, 2004, the CTB rescinded and amended the June 21, 2001 action as follows:
  - Amending action approving Segment Alternatives 376, 287A and 399, as Segment Alternatives, to be rescinded.
  - Amending action approving Segment Alternatives 118 and 118B, as a connector to U.S. Route 200, to be rescinded.
  - Approval of Segment Alternatives 375, 118, 118B and 118C, and designation of these Segment Alternatives as a Limited Access Highway and add them to the Interstate System of Highways as a part of Virginia I- 73.
5. The July 15, 2004 action by the CTB advances an ALC which consist of segments which were previously evaluated in the October 2000 DEIS and therefore does not result in any changes to the proposed project or significant environmental impacts that were not previously considered.
6. In addition to avoiding the Southeast Neighborhood Historic District, the July 15, 2004 action by the CTB resulted in a Blue Ridge Parkway crossing along existing US Route 220, which has been the preferred crossing for the National Park Service (NPS) since the inception of the project. All other alternatives would entail a new crossing of the Blue Ridge Parkway in more pristine settings. The crossing of the Blue Ridge Parkway at the existing US Route 220 crossing occurs in an urban setting where the visual and aesthetic opportunities of a natural experience have long since been compromised by modern development. This crossing was addressed in the October 2000 DEIS and does not introduce any impacts not previously considered. In addition, it has been recently determined that the proposed crossing of the Blue Ridge Parkway at Route 220 will occur within the existing right-of-way, thereby avoiding any use of the Parkway under Section 4(f). In contrast, all of the other crossings on new location would have used property from the Blue Ridge Parkway.
7. Additional functional design efforts have been applied to the July 15, 2004 ALC to further avoid and/or minimize impacts to cultural resources adjacent to the corridor. These design efforts include:
  - Re-configuration of directional ramps at Orange Avenue to avoid the First Baptist Church Cemetery in Roanoke.
  - Retainage walls in the urban section in Roanoke to minimize disturbance to the Old Southwest Historic District in Roanoke.
  - Re-alignment to avoid an effect upon the Eggleston Cemetery in Franklin County.
  - Re-configuration of typical section to eliminate 4(f) impact upon Blue Ridge Parkway.

New circumstances, supplemental analyses and/or updated information relevant to impacts associated with the ALC have arisen since the October, 2000 DEIS. Several field reviews of the project area were conducted to determine if the area has changed from the DEIS conditions (e.g., new housing or commercial developments, new industrial developments, changes in critical habitat, etc.). This information is further elaborated below:

1. During the course of archaeological investigations on the ALC two previously unrecorded historic properties were discovered: the Tyree Woody House in Franklin County and the Eggleston Cemetery in Henry County. Both resources were found to be eligible for the National Register of Historic Places. The Virginia Department of Historic Resources (VDHR) determined that the ALC will have no effect upon either resource. Prior resources documented in the DEIS which may have had a bearing on the ALC have since been addressed. Regarding the ALC, VDHR has concurred in a finding of no effect or no adverse effect on the following archaeological and historic resources described in the October 2000 DEIS: Blackard Trent House, Clearbrook Elementary School, Walnut Street Bridge, Jefferson Street Bridge, Virginia Passenger Station and Depot, Old Southwest Historic District, Norfolk and Western Motive Power Building and the First Baptist Church Cemetery. Additional archeological work on the ALC alignment that was conducted in advance of the CTB's 2004 decision did not raise any new archeological issues. Based on the field reviews and subsequent coordination with the VDHR, we conclude that no significant changes to the affected environment have occurred that warrant further investigation or that would alter the findings of the DEIS (see attached checklist for details and follow up discussion in the FEIS).
2. The Roanoke Valley Area Metropolitan Planning Organization, the region's only MPO, has a current (2004) Constrained Long-Range Transportation Plan (CLRTP). The CLRTP was reviewed to determine if the project is still consistent with what was presented in the DEIS. I-73 is listed in the CLRTP under both the fiscally constrained long-range plan and in the MPO's vision plan. In addition to reviewing the CLRTP, local planning authorities were contacted to assist in determining whether there have been substantial changes in the area and to determine if their comprehensive plans or zoning ordinances have changed such that the ALC is no longer consistent with their plans. Based on discussions held in November 2003 and June 2004 with planning staff from the various affected localities, we conclude that no significant land use or land use planning changes have occurred that would alter the findings of the DEIS.
3. NEPA-related laws, regulations and guidance were evaluated to determine if regulatory changes have occurred and, if so, how they would affect the previous DEIS results. On May 22<sup>nd</sup> and 23<sup>rd</sup> of 2002, a two-day resource agency site visit was provided to evaluate the ALC field conditions. Participants included the Virginia Department of Environmental Quality (DEQ), the Virginia Department of Game and Inland Fisheries (VDGIF), the US Army Corps of Engineers (Corps), the US Fish and Wildlife Service (USFWS), the US Environmental Protection Agency (EPA), the Federal Highway Administration (FHWA), VDOT and consultant members responsible for preparing the NEPA documentation. Field conditions for wetlands, stream crossings and potential threatened and endangered species habitat were examined. Based on the review, we conclude that no significant field changes have occurred since the DEIS was signed except as detailed below and in the FEIS. Suggestions from the agencies as a result of and subsequent to the May 2002 field review have been incorporated and addressed in the FEIS including:
  - Wetland and habitat avoidance and minimization measures.
  - Recognition of migratory bird populations in the study area.
  - Recognition of riparian buffers as mitigation.
  - Recognition of the potential for upland forested habitat as mitigation for project impacts.

Based on coordination with these agencies, surveys were conducted for the Roanoke logperch, James spiny mussel, and smooth cone flower at select river crossings and other locations where it was determined that existing habitat could support the protected species. Based on these surveys, no populations of the James spiny mussel or smooth cone flower were found. In addition, only one

population of the Roanoke logperch was found, and that was in proximity to the Pigg River crossing of I-73. Since then, a biological assessment for the Pigg River population of the Roanoke logperch was prepared. Additional surveys conducted on the ALC alignment in advance of the CTB's 2004 decision did not raise any new threatened and endangered specie issues.

4. As already documented in Section 3.3 of the DEIS, all of the counties and localities in the study area are currently designated by EPA as being in attainment for the 1-hour standard for ozone, nitrogen dioxides, and particulate matter. EPA is not proposing to designate any new 1-hour ozone or PM10 areas. Recently, the EPA determined that the Roanoke area consisting of the City of Roanoke, City of Salem, Roanoke County and Botetourt County exceeded the 8-hour standard for ozone based on current monitoring data while being in attainment for the PM2.5 standard. Instead of designating the area nonattainment under the 8-hour standard, EPA deferred the nonattainment designation because the area is proactively working to clean up the air through implementation of an Early Action Compact (EAC). If the area meets the required milestones prescribed for EAC areas and can submit three consecutive years of clean monitoring data, then the region will be reclassified as an attainment area in 2007. Interstate 73 would have no impact on this effort since it would not be constructed or under construction by 2007. Notwithstanding, EPA's preamble to the 8-hour final rule states that conformity (in this case, we are speaking specifically of the preparation of a meso-scale analysis) is not a control measure to be used like the voluntary measures that are included in the EAC. Rather, conformity establishes a process in nonattainment areas for state and local governments to consider the broader emission impacts of their transportation decisions. In addition, the EAC protocol developed by EPA does not require the EAC area to meet the transportation conformity requirements since the conformity requirements only kick in one year after an area is designated nonattainment. Consistent with 40 CFR 93.102(d) and section 176(c)(6) of the Clean Air Act, conformity for the 8-hour standard (i.e. meso-scale analysis) does not apply in early compact areas provided the area meets all of the terms and milestones of its EAC. Failure to meet these terms or milestones will invoke the nonattainment designation requiring conformity for the 8-hour standard within one year of the designation.
5. Additional traffic simulation modeling was conducted along the highly urbanized section of I-73 from I-81 in Roanoke County to Route 419 in the City of Roanoke. The CORSIM application was utilized to optimize alternative typical sections and interchange configurations to assure that a safe level of service could be achieved while encouraging a design footprint with minimal impact. This analysis showed that appropriate level of service could be achieved through interchange improvements and the use of collector and distributor roads instead of adding additional lanes to the main line that were not previously considered in the draft EIS.
6. In the draft EIS, previously recorded archeological sites were identified along with the alternative associated with each site. In addition, predictive modeling was used to identify the potential for encountering archeological resources along each alternative. With the approval of a location by the CTB, an archaeological survey was conducted of the ALC as well as the realignment of the ALC to cover Segments 375 and 118c. Based on these surveys, four sites were identified as being potentially eligible for the National Register. Of the newly recorded sites, 44HR183 and 44HR184 were evaluated and determined to not be eligible for the NRHP. Two cemeteries, The Eggleston Cemetery (VDHR # 044-5157) and the First Baptist Church Cemetery (VDHR # 128-5783) were recommended as potentially eligible for the NRHP, but both have been avoided by design changes and no further evaluation has been conducted for them. During the ALC archaeological surveys a site, 44FR230, was recorded on a site form on file at VDHR. This small Native American site is

located on a primary terrace of the Pigg River. A quartz flake and a quartz lanceolate projectile point with a deep concave base were recovered from this site at the time it was originally recorded. The site form on file at VDHR indicates that the area in which the site is located is prone to flooding and that buried deposits could be present. When this site was revisited during the current survey, the field in which it was reported to be located was plowed and exhibited approximately 80 percent visibility. No artifacts were recovered during a surface survey of the field. Shovel tests excavated in the field indicated that deposits of alluvial sand extended to depths greater than 100 cm. No artifacts were recovered in the shovel tests. No evidence of 44FR230 was found within the current project area.

7. A biological assessment was prepared, and FHWA provided it to the USFWS in December of 2003, requesting that they initiate formal consultation in accordance with Section 7. The USFWS was unable to initiate formal consultation because of insufficient information and requested additional information related to the design, construction and scheduling of the Pigg River crossing. Because this information is not yet available, FHWA withdrew its request to initiate formal consultation in February of 2004. In withdrawing its request, FHWA noted that the USFWS thought it premature to complete formal consultation prior to completion of the EIS because changes to projects during design and constant updates in the USFWS' knowledge of species often invalidates the consultation (USFWS letter to Ms. Bier dated March 18, 2003; confirmed by FHWA on July 2, 2004, with the USFWS via e-mail). In withdrawing its request, FHWA also noted that any Record of Decision that was issued would need to be conditioned to reflect the consultation that was still needed and acknowledged that the survey work would likely need to be revisited during the design phase of the project. Separate from this project, VDOT has funded a range-wide assessment of habitat suitability for the Roanoke logperch that involved surveys at 17 sites in seven watersheds. The preliminary results of those surveys are that logperch populations were identified at two of the sites, one of which constituted a new find (Goose Creek). The results of the range-wide assessment of habitat suitability will be used in any future consultation with the USFWS to further refine knowledge concerning the status and distribution of the Roanoke logperch.
8. Consultation between the National Park Service, Federal Highway Administration, and Virginia Department of Transportation regarding the crossing of the Blue Ridge Parkway has been ongoing for the last three years. The purposes of the meetings were to address the design and visual and aesthetic issues associated with the crossing. These meetings have been productive in identifying measures to minimize impacts to the Parkway, and facilitated the development of a Memorandum of Agreement among and between FHWA, VDOT, the Virginia Department of Historic Resources, the National Park Service, and the Advisory Council on Historic Preservation in accordance with Section 106. A draft of the Memorandum of Agreement has been reviewed by the consulting parties and is in the process of being finalized.
9. In November of 2002, FHWA and VDOT were presented with a report funded by Virginians for Appropriate Roads (VAR) and developed by Harold L Reem. The Reem report asserted that the Oak Hill Old German Baptist Brethren Community in Franklin County was eligible for the National Register of Historic Places as a rural historic landscape and traditional cultural property. The proposed historic landscape and traditional cultural property, as delineated in the Reem report, would have been severed by the ALC. VDOT and their consultant spent the remainder of 2002 and 2003 evaluating the German Baptist community to determine its eligibility as a historic landscape and traditional cultural property. In late 2003, VDOT presented their findings to the Virginia Department of Historic Resources. In December of 2003 the Virginia Department of Historic

Resources concurred with VDOT's findings that the Oak Hill Old German Baptist Brethren Community was not eligible for the National Register of Historic Places. In June of 2004, after being asked by VAR to intervene and elevate the eligibility of the Oak Hill Old German Baptist Brethren Community, the Advisory Council on Historic Preservation found no cause to refer the eligibility of the Oak Hill German Baptist Brethren Community to the Keeper of the National Register.

10. At the request of FHWA and in response to public comment, a benefit-cost analysis of the ALC was prepared by VDOT. 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%. Some individuals commenting on the draft EIS argued that a benefit-cost analysis should be performed for all alternatives since economic development was a component of the purpose and need. Some have cited Section 1502.23 of CEQ's regulations to support their position. However, economic development potential is not considered in benefit-cost analyses performed in accordance with the AASHTO methodology and would not assist in understanding that issue. Further, CEQ's regulations specifically state, "if a cost-benefit analysis relevant to the choice among environmentally different alternatives is being considered for the proposed action, it shall be incorporated by reference or appended to the statement..." Clearly, this statement does not identify circumstances when a benefit-cost analysis should be prepared; it merely acknowledges circumstances under which one may be prepared and identifies how the report is to be presented in the EIS (i.e. by reference or appended). Notwithstanding, the only circumstance described by CEQ where a benefit-cost analysis might be prepared is one where the environmentally different alternatives are being considered. However, on I-73, all of the build alternatives have environmental concerns that are not widely divergent.
11. Since the circulation of the draft EIS in October of 2000, VDOT has extended the design year for the project from 2020 to 2025. As a result, the traffic data used for the EIS has been revised to reflect the new design year. The predicted 2025 traffic volumes for the ALC will only increase by 2.51 to 8.04 percent over the volumes used in the draft EIS. However, this increase will have little or no effect on the one-hour or eight-hour CO levels predicted for the project because the VACAL\*5A program is not sensitive to minor fluctuations in traffic volumes as it is to changes in speeds which will remain relatively the same. In addition, emission factors within the VACAL program have been updated with the introduction of MOBILE6 by EPA in January of 2002. MOBILE6 emission factors are lower than corresponding MOBILE5 emission factors due to improvements in vehicle emission control devices and engine technologies which are accounted for by the model. Therefore, the increase in future traffic volumes forecast for the 2025 design year are not expected to substantially change the results of the CO analysis that was prepared for the draft EIS. Likewise, this increase in traffic will have little or no effect on the noise levels predicted for the project because traffic volumes, as a rule of thumb, would need to double (100 percent increase) to result in a 3dBA increase in the predicted noise level. A 3dBA increase is a barely perceptible increase of the predicted noise levels. Notwithstanding, when final design moves forward for the selected

alternative, the design year will be extended again to ensure a minimum 20-year design and the traffic data and the air and noise analysis updated as necessary.

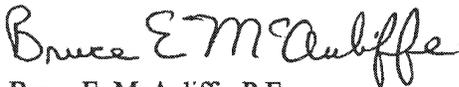
12. The socioeconomic data has been updated based on the 2000 Census. There do not appear to be any significant changes to the socioeconomic data that was included in the draft EIS.

Additional material regarding the Reevaluation of the DEIS and information supporting the events and study efforts described above is included in the attached Checklist and is being further evaluated in the Final Environmental Impact Statement (FEIS).

The ALC, as presently proposed, consists of segments which were previously evaluated in the October 2000 DEIS. No new alignment alternatives have been introduced, and no changes have been made to the scope and concept of the project as presented in the draft EIS. Therefore, it is our opinion that the findings and analysis included in the draft EIS remain valid and a Supplemental DEIS is not warranted. Attached is the completed checklist that documents our reevaluation findings. If you agree with our findings, please indicate with your signature below.

Thank you for your attention to this matter. Should you have questions, please call me at 804-786-6757.

Sincerely,

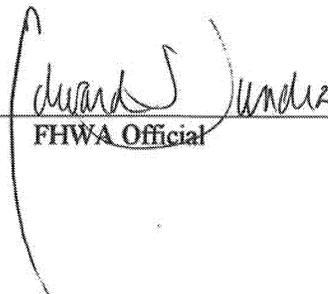


Bruce E. McAuliffe, P.E.  
I-73 Location Study Project Manager

Attachment

I concur with the findings and conclusion of the aforementioned discussion and with the attached evaluation checklist that the new information or circumstances relevant to environmental concerns and bearings on the proposed action or its impacts have not resulted in any significant environmental impacts not already evaluated or considered in the draft Environmental Impact Statement. Further, there have been no changes to the design scope or concept of the project when compared to the design and scope of the project presented in the draft Environmental Impact Statement. Therefore, a supplemental draft Environmental Impact Statement is not required.

June 24, 2005  
Date



FHWA Official





## Reevaluation: I-73 Location Study, Issue Evaluation Checklist

Issue or Area of Concern	New Resource Present	Method of Review	Have the Impacts Changed?	Comment
<b>TRANSPORTATION</b>				
Traffic Volumes/Patterns/Time	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	VDOT consultation with FHWA, Roanoke – Allegheny MPO.	No significant new impacts.	The travel demand forecast year and subsequent traffic volumes were updated from 2020 to 2025. Level of service was subsequently re-calculated. A CORSIM model was developed and applied to the urban section of I-73 from I-581 to Route 419 in Roanoke to better assess the improvements required to accommodate I-73.
Public Transportation	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Highways	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Transportation Plan	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Freight	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
<b>LAND USE</b>				
Land Use Conversion	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Field review and discussions with local planning staff.	No new impacts.	There have been no significant land use conversions or developments within the I-73 area that have not already been considered in the DEIS. Comprehensive plans or zoning ordinances have not changed such that the ALC is no longer consistent with local plans and zoning. Refer to Appendix A for specific local planning staff responses. Have any localities changed the land use in their comprehensive plan because of the location of I-73? See VAR's comments on the DEIS.
Development	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Consistent with Area Comprehensive Plans	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<b>POPULATIONS &amp; SERVICES</b>				
Populations	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Discussions with local planning staff.	No new impacts.	The socioeconomic data has been updated to reflect the 2000 Census, but there do not appear to be any significant changes in populations or emergency services since the DEIS was signed.
Emergency Services	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
<b>RELOCATION IMPACTS</b>				
Potential Relocations	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Field review and discussions with local planning staff.	No new impacts.	There have not been any substantial residential developments constructed in proximity to the alternatives under consideration since the DEIS was signed. There have been no substantial changes in the location and size of Environmental Justice populations since the DEIS was signed. Therefore, a significant change in the number of relocations or impacts to Environmental Justice populations is not expected.
Environmental Justice Populations	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			



## Reevaluation: I-73 Location Study, Issue Evaluation Checklist

Issue or Area of Concern	New Resource Present	Method of Review	Have the Impacts Changed?	Comment
<b>ECONOMIC IMPACTS</b>				
Business Relocations	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Field review and discussions with local planning staff.	No new impacts.	There have been no significant business developments in the area that were not already addressed in the DEIS. Therefore, a significant change in the number of business relocations is not expected. Assumptions regarding employment created through project implementation remain valid. A new biotechnology park sponsored by two Virginia universities and a regional healthcare corporation will open in downtown Roanoke adjacent to the proposed ALC. The biotechnology park was considered in the DEIS. A benefit cost analysis indicates direct transportation user benefits will exceed the capital costs of I-73.
Construction & Operations Employment	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
<b>VISUAL &amp; AESTHETICS</b>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Field review, discussions with local planning staff, VDOT's Project Manager.	No new impacts.	There have been no changes to the design components of the ALC that would alter the visual and aesthetic character of the project area.
<b>FARMLANDS</b>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Field and map review of the project area. Reassessment and ratings for prime soils were provided by NRCS.	No new impacts.	There are no significant changes to the affected environment of farmlands. In addition, there are no changes to the design components of the ALC that significantly alter impacts to farmlands, as presented in the DEIS.
<b>NOISE &amp; VIBRATION</b>				
Noise Criteria	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	VDOT consultation with FHWA.	No new impacts.	As a result of the findings on Land Use and the determination that additional traffic modeling resulted in less than a 10% increase in Average Daily Traffic volumes, an update of the Noise modeling has not been conducted.
Existing Noise Conditions	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			



**Reevaluation: I-73 Location Study, Issue Evaluation Checklist**

Issue or Area of Concern	New Resource Present	Method of Review	Have the Impacts Changed?	Comment
<b>AIR QUALITY</b>				
Existing Conditions	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			<p><b>Current 2025 CLRTP:</b> I-73 components included within the boundaries of the MPO.</p> <p><b>Current 2005 – 2007 STIP:</b> Included in the current 2005 – 2007 TIP 1. For PE only – 0.88 miles north of I-581 milepost 144.5 to Hershberger Road, 3.9 miles ). 2. Funded through FEIS and Record of Decision.</p> <p><b>Conformity:</b> Under a program created by EPA, planners and leaders in the Roanoke/Salem area voluntarily developed strategies to improve air quality in the region and explored the feasibility of accelerating their implementation in exchange for the deferral of the nonattainment designation by EPA. This effort culminated in the development of an Early Action Compact (EAC) in December 2002. The EAC is a plan that is designed to reduce O<sub>3</sub> precursor pollutants and improve air quality within the Roanoke/Salem area that has been recorded exceedances of the new 8-hour ozone standard. On April 15, 2004, the EPA issued the Final Rule designating and classifying areas not meeting the NAAQS for the 8-hour ozone standard. In this Final Rule, the Roanoke/Salem area was recognized as one of the areas with an Early Action Compact where the nonattainment designation would be deferred and the transportation conformity requirements would not be applied. In December of 2004, EPA designated areas in nonattainment for the new particulate matter standard (PM<sub>2.5</sub>). No counties or cities in the study area were designated nonattainment.</p>
Regional Compliance with the Standards	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Review of the current Conformity Standards, discussions with VDOT staff, review of Roanoke Alleghany Valley MPO CLRTP and TIP	No new impacts.	



**Reevaluation: I-73 Location Study, Issue Evaluation Checklist**

Issue or Area of Concern	New Resource Present	Method of Review	Have the Impacts Changed?	Comment
<b>ECOSYSTEMS</b>				
Native Wildlife	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Field review of the project area with EPA, COE, FWS, DEQ; endangered specie surveys, data search, development of a Biological Assessment for the Roanoke logperch.	No new impacts.	The affected environment for the resources listed has not changed substantially since the DEIS was distributed in October of 2000. In addition, there are no changes to the design or components of the ALC that would alter impacts to resources listed, as presented in the DEIS. Section 7 consultations for the Roanoke logperch will be reinitiated as the project enters the engineering design phase as preferred by the USFWS. USFWS concerns about the long-term viability of the Pigg River population of the Roanoke logperch have increased due to information submitted to them regarding the impact of agricultural practices in the Pigg River watershed.
Existing Vegetation	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Rare, Threatened & Endangered Species	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Critical Habitat	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Wildlife and Waterfowl Refuges	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
<b>WATER RESOURCES</b>				
Surface Waters	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Field review of the project area, data review, discussions with resource agencies and local planning staff.	No new impacts.	The affected environment for water resources has not changed substantially since the DEIS was distributed in October of 2000. The public water supply has not changed. In addition, there are no changes to the design or components of the ALC that would alter impacts to the resources listed.
Dredging Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Public Water Supply	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
<b>AQUATIC RESOURCES</b>				
Fish	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Field review of the project area, data review, discussions with resource agencies and local planning staff.	No new impacts.	The affected environment for aquatic resources has not changed substantially since the DEIS was distributed in October of 2000. See comments above (Ecosystems) regarding the Roanoke logperch. In addition, there are no changes to the design or components of the ALC that would alter impacts to the resources listed.
Submerged Aquatic Vegetation	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Benthos	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Other Flora and Fauna	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			



**Reevaluation: I-73 Location Study, Issue Evaluation Checklist**

Issue or Area of Concern	New Resource Present	Method of Review	Have the Impacts Changed?	Comment
<b>FLOODPLAINS</b>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Field review of the project area and discussions with local planning staff.	No new impacts.	The affected environment for floodplains has not changed substantially since the DEIS was distributed in October of 2000. In addition, there are no changes to the design or components of the ALC that would alter impacts to this resource.
<b>WETLANDS</b>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Field review of project area, data review, discussions with agencies and local planning staff.	No new impacts.	The affected environment for wetlands has not changed substantially since the DEIS was distributed in October of 2000. In addition, there are no changes to the design or components of the ALC that would alter impacts to this resource.
<b>ENERGY</b>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Review of DEIS and application of more current fuel consumption data.	No new impacts.	The affected environment has not changed substantially since the DEIS was distributed in October of 2000. In addition, there are no changes to the design or components of the ALC that would alter the energy analysis. Updated fuel consumption data has been applied in the FEIS tables.
<b>HAZARDOUS WASTE SITES</b>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Field review of the project area.	No new impacts.	There are no changes to the design or components of the preferred alternative that would alter impacts to the resource listed. A new Hazardous Material survey was conducted as the prior survey was six years old. No new hazardous material sites are impacted by the ALC.
<b>PUBLIC PARKLANDS</b>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Field and map review of the project area, as well as discussions with local planning staff.	No new impacts.	A new linear urban trail along the Roanoke River in Roanoke has been developed as part of the Roanoke Valley Greenways system since the DEIS. This trail parallels the Roanoke River and crosses under an existing Roy Weber Freeway (US 220) bridge. The freeway and bridge will be re-designated as I-73. There will be no disturbances to the trail and no new impacts to the trail that does not already exist. In addition, since there are no changes to the design or components of the preferred alternative, existing public parklands will continue to be avoided.



**Reevaluation: I-73 Location Study, Issue Evaluation Checklist**

Issue or Area of Concern	New Resource Present	Method of Review	Have the Impacts Changed?	Comment
<b>HISTORIC &amp; ARCHAEOLOGICAL RESOURCES</b>				
Architectural Resources	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Archaeological and Historic Architectural surveys, coordination with the SHPO.	New impacts avoided.	<p>Additional archaeological and historic resource surveys have been conducted since the distribution of the DEIS in October, 2000. The Southeast Roanoke Historic District, the Tyree Woody House and the Eggleston Cemetery are the only new historic or archaeological resources that have been determined eligible for the Historic Register. The ALC will have no effect on the Southeast Neighborhood Historic District. The Virginia Department of Historic Resources (VDHR) has concurred that the ALC will have no effect upon both the Tyree Woody House in Franklin County or the Eggleston Cemetery in Henry County.</p> <p>VDHR has concurred that the ALC will have an adverse effect upon the Blue Ridge Parkway. Measures to minimize impacts to the Blue Ridge Parkway are being addressed in a Memorandum of Agreement (MOA) between the National Park Service, FHWA, VDOT, ACHP, SHPO, and other consulting parties.</p>
Terrestrial Archaeological Resources	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
Underwater Cultural Resources	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			



**Reevaluation: I-73 Location Study, Issue Evaluation Checklist**

Issue or Area of Concern	New Resource Present	Method of Review	Have the Impacts Changed?	Comment
<b>SECONDARY &amp; CUMULATIVE</b>				
Socioeconomic Impacts	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Discussions with local planning staff.	No new impacts.	There have been no significant changes to the socioeconomic or natural environment since the DEIS was distributed in October of 2000. Secondary and cumulative impacts presented in the DEIS have been expanded in the FEIS to cover a larger historical context and have been updated to account for recent major developments identified in interviews with local planning officials. In addition, a secondary and cumulative impact analysis has been prepared for the biological assessment.
Natural Resource Impacts	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
<b>CONSTRUCTION IMPACTS</b>				
Air Quality	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Review of potential construction techniques for the project.	No new impacts.	There are no changes to the design or components of the ALC that would alter the activities associated with construction of the project.
Noise	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Water Quality	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Maintenance & Control of Traffic	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Health & Safety	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Pollution Control	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
<b>SECTION 4(F) EVALUATION</b>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Field Review of the project area.	No new impacts.	No new Section 4(f) resources have been identified in the area. The ALC has no Section 4(f) impacts.  The crossing of the Blue Ridge Parkway by the ALC is the crossing preferred by the NPS. I-73 at this location will be constructed within the existing Route 220 right-of-way and not require the use of any property from the Blue Ridge Parkway.



Reevaluation: I-73 Location Study, Issue Evaluation Checklist

PERMITS/FINDINGS				
Compliance with E.O. 11990 (Wetlands)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>Review of the preferred alternative and environmental regulations.</p>	<p>No new impacts.</p>	<p>There are no changes to the design or components of the ALC and there have been no regulatory changes related to project development or construction activities.</p> <p>No significant changes to the affected environment have occurred that warrant additional study or change the findings of the DEIS except as documented in this checklist and further delineated in the FEIS.</p> <p>Those permits or compliances required for the preferred alternative, as listed remain valid.</p>
Section 404 Permit (Clean Water Act)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Section 10 Permit (Rivers & Harbors Act)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Virginia Water Protection Permit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Subaqueous Bed Permit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Coast Guard Permit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Compliance with the ESA	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Compliance with Section 106 of the National Historic Preservation Act	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Compliance with Section 4(f) of the 1966 Department of Transportation Act	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Compliance with E.O. 12898 on Environmental Justice	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Consistency with Coastal Zone Management Act	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Compliance with E.O. 12898 (Floodplains)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Erosion & Sediment Control Laws	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Stormwater Management Act	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			

MITIGATION MEASURES				
Relocations	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>Evaluation of resources within the preferred alternative by field and map review, review of the DEIS as well as consultation with VDOT's Project Manager, FHWA, and local planning staff.</p>	<p>No new impacts, therefore no anticipated changes in the mitigation efforts planned for the project.</p>	<p>There are no changes to the design or components of the ALC that would affect the mitigation efforts planned for the project. Additional detail and stronger commitments regarding mitigation commitments have been made for the final EIS.</p>
Farmlands	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Noise	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Rare, Threatened & Endangered Species (Piping Plover)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Floodplains	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Wetlands	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Water Quality	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Aquatic Resources	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Hazardous Waste Sites	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Construction Impacts	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Air Quality	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Noise	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Water Quality	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Maintenance & Control of Traffic	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Health & Safety	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Pollution Control	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			



## ATTACHMENT A

### REEVALUATION: I-73 LOCATION STUDY

Reevaluation: I-73 Location Study

UPC Codes: 16596  
 State Project Number: 0073-962-F01, PE101  
 FHWA EIS Number: FHWA-VA-EIS-NH-962-2 (004)  
 DEIS Date: October 25, 2000  
 FEIS Date:  
 ROD Date:

#### Local Planning Staff Contacted

<i>Name</i>	<i>Locality</i>	<i>Contact Phone No.</i>	<i>Date Contacted</i>	<i>Comment</i>
Brian Townsend	City of Roanoke - Director of Planning, Building & Development	(540) 853-2346	November 8, 2003	Meeting held to discuss environmental justice issues and indirect effects/cumulative impacts. The 2000 census data was consistent with local officials' knowledge of the location of low-income and minority populations in Roanoke City. Recent development plans not previously documented were noted.
Covey O. Arnold	Roanoke County - Director of Community Development	(540) 776-7111 ext 237	November 11, 2003	Meeting held to discuss environmental justice issues and indirect effects/cumulative impacts. The 2000 census data is consistent with local knowledge of the location of minority populations in Roanoke County. Areas of low-income populations not evident from the 2000 census data would not be affected by any of the Build Alternative Options. Recent development plans not previously documented were noted.
Bonnie Johnson	Franklin County - County Administrator	(540) 483-3027	June 4, 2004	Meeting held to discuss environmental justice issues and indirect effects/cumulative impacts. Discussions with local officials confirm that most of the areas representing higher percentages of minority and low-income populations are sparsely developed. There were no concentrations of minority or below poverty populations identified in the project corridors. Recent development plans not previously documented were noted.
Lee Clark	Henry County - Director of Planning and Community Development	(276) 634-4624	November 7, 2003	Meeting held to discuss environmental justice issues and indirect effects/cumulative impacts. Based on discussions and review of available data, there is no indication the ALC or any of the other Build Alternative Options that were under consideration would disproportionately effect either the low-income or minority concentrations or individuals in Henry County. Recent development plans not previously documented were noted.





## ATTACHMENT B

### Resource Agency Field Review

May 22 – 23, 2002

<i>Name</i>	<i>Locality</i>	<i>Contact Phone No.</i>
Carolyn Browder	Virginia Department of Environmental Quality, Water	(804) 698-4420
Brian Moyer	Virginia Department of Game and Inland Fisheries	(804) 367-9489
Alice Allen-Grimes	US Army Corps of Engineers	(757) 441-7219
William Hester	US Fish & Wildlife Service – Virginia Field Office	(804) 693-6694
Peter Stokely	US Environmental Protection Agency	(703) 648-4292
Fred Davis	VDOT - Salem District	(540) 378-5043
Kevin Bradley	VDOT - Salem District	(540) 387-5238
Patsy Napier	VDOT – Richmond Central Office	Retired
Mark Wittkofski	VDOT – Richmond Central Office	(804) 371-8687
Ed Sundra	FHWA – Richmond Division Office	(804) 755-3338
Chris Lloyd	Parsons Brinckerhoff	(757) 466-9675
Martin Mitchell	Parsons Brinckerhoff	(757) 466-9661





## ATTACHMENT C

### Post DEIS Coordination Meetings with National Park Service

#### Re: Blue Ridge Parkway

<i>Date</i>	<i>Meeting Agenda</i>	<i>Location</i>
May 1 & 2, 2002	Crossing Alternatives, Renderings, MOA	Peaks Of Otter, VA
July 17, 2002	Crossing Alternatives, MOA, Review Photo Simulations	Salem, VA
August 17, 2002	MOA, Simulations, Access	Teleconference - Salem, Richmond, VA
March 18, 2003	MOA, Crossing Alternatives	Salem, VA
September 15, 2004	MOA	Salem, VA
October 19 & 20, 2004	Discuss MOA with City of Roanoke Mayor, City Manager and City Council members	Roanoke, VA
April 28, 2005	Discuss MOA with Roanoke County	Teleconference - Salem, Richmond, VA

