Section 2.1.1

The DEIS notes that as early as 1989,the US 321 project was a widening project and despite protestations at the time by the citizens (about 2-1 in Blowing Rock according to all surveys),the NCDOT has treated it that way for more than a decade. There have been several "window-dressing" activities to make the people believe NCDOT was seriously cosidering a bypass but to those of us closely following the activitiies the sham was apparant. For example, the 1993 "Most Reasonable" bypass alternative (DEIS Fig. 2-2) was so outrageous that everyone rejected that alternative in 1993 and continue to reject its progeny, the current Bypass Alternative 1A.

Section 2.1.2

The DEIS notes that as early as August 1, 1996, the citizens adopted a "none of the above" answer to NCDOT. The citizens in Caldwell County rural areas and those in rural areas north of the Blue Ridge Parkway oppposing the bypass alternative and "most others indicated that an alternative that completely bypassed Blowing Rock was the only reasonable option". NIMBY (Not In My Back Yard) is alive and well in the project area. Having been warned, it would have been reasonable for NCDOT to go to the selection criteria developed by the Citizens Advisory Committee (DEIS p.2.2) of safety, efficiency of traffic movement, and cost. Alas, NCDOT persisted in preferring the widening alternative; ignoring the safety and efficiency of traffic movement of a true bypass and focussed solely on cost. As will be discussed in later comments, NCDOT made "refinements to the Concerned Citizens of Blowing Rock (CCBR) alternataives." (DEIS p. 2-2) These "refinements" to the CCBR tunnel bypass route appear to be for the sole purpose of increasing the cost of Bypass 4A/B so that an argument can be made that neither 4A or 4B is a feasible and prudent alternative to the use of Section 4(f) property along the widening alternative.

A PROPERLY DESIGNED TUNNEL BYPASS IS THE ONLY OPTION THAT WILLSATISFY THE CITIZEN ADVISORY COMMITTEE CRITERIA AND THE HFTA.

Section 2.1.3

GEOTECHNICAL

Geotechnical studies were conducted in 1998 and were used in the preliminary design work. A preliminary examination of the DOT geologic map and report on the bypass and field study in the area show that much additional work needs to be done on geology if NCDOT is to have an accureate assessment of thatgeology for evaluation of bypass proposals.

Among the deficiencies noted are (1) some of the rock types shown on the map are not correctly identified; (2) some rock types were overlooked; (3) at least one rock body contact near Thunder Hill appears to be mislocated; (4) the report attributes deformation of the rocks to cataclasis but, in fact, much of the deformation in the area is mylonitic; (5) the report states that "there are two dominant sets of joints in the study area" when work by local experts note that "there are at least nine joint sets and may be as many as 11 or 12."

The importance of this cataclastic/mylonitic difference is that it will affect any proper evaluation of design. Cataclastic rocks are weak and subject to failure during and after construction, but mylonitic rocks have much greater strength. Although there is some local cataclasis, it is not my imression from preliminary work of a local expert, that cataclasis is widespread. Hence, cataclastic rocks should not present the construction problems, for example in the Aho Road area, suggested by NCDOT in the report that cataclasis is widespread.

In addition to grossly understating the number of joint sets (2 vs. 11 or 12) the report lumps all joints trending in the northeast direction as 1 joint set regardless of direction and angle of dip (tilt from the horizontal). This is important, because construction plans attempt to account for slope failures that may occur during construction. If the number and directions of specific joint sets and systems is unknown, an accurate wedge analysis, designed to reveal potential slope failures during construction, cannot be completed. Considering the number of joint sets actually present in the Blowing Rock area, the joint analysis in the report cannot serve as the basis for an accurate wedge analysis.

Some of these issues are of less concern for the bypass construction than are others. For example, exact identification of all rock types is probably not critical. In general, it is fair to say, however, that much additional work needs to be done on the geology, if NCDOT is to have an accurate assessment of that geology for evaluation of bypass proposals.

ORIGIN AND DESTINATION

After 7 years of requests by CCBR, NCDOT finally conducted an origin and destination study in September 1998 to determinethe amount of traffic going through BLowing Rock without stopping. The study validated the CCBR assertion that a very large majority of the US 321 traffic was not destined for Blowing Rock and should be carried on a bypass around the town not jammed through it.

When 87% of the traffic is through-traffic that would be better served by a faster, safer, more efficient bypass, what is left to decide? BUILD THE BYPASS.

When 75% of the traffic is daily through-traffic (traveling between home and work) that would be better served by a faster, safer, more efficient bypass, what is left to decide? BUILD THE BYPASS.

When almost 12% of the through traffic is commercial (medium trucks and buses (6%) and heavy trucks (5.5%) which would be better served by a faster, safer, more efficient bypass , what is left to decide? BUILD THE BYPASS.

NCDOT probably misunderstands the results of the May 10, 1999 comment: "half of the respondents favored the widening alternative while the other half favored Bypass Alternative 4 (DEIS p. 2-6)". Few, if any, actually favor the widening alternative per se-- they are opposed to a bypass that may impact their land or view and will accept ruining Blowing Rock to protect themselves. Again, NIMBY is alive and well. Similarly, those favoring a bypass really just want to prevent the widening of the existing road and the resulting destruction of the resort of Blowing Rock.

NCDOT can never satisfy more than half of the people by any selection so it should choose a route that will meet the Citizens Advisory Committee criteria of faster, safer, and more efficient. Chose a route that will satisfy the HFTA. Chose a route that will not require the use of Section 4(f) property.

CHOOSE A PROPERLY REDESIGNED BYPASS SIMILAR TO BYPASS 4A OR 4B.

Section 2.2.2

The DEIS restates the location criteria deemed importantto CCBR in the 1995-1997 period when CCBR was trying to get NCDOT to seriously consider a true bypass of Blowing Rock . These six criteria are still relevant although the first one-- to preferably begin the bypass south of the "S" curves just south of the Blowing Rock town limits-- has been taken away by the definition of the project limits. In the early days of this project,everyone--including NCDOT--agreed that the 4 lane "S" curve area was the most dangerous local accident area and where many fatal and serious injury accidents have occured in recent years should be corrected (straightened).
The combination of very sharp curves and high speeds have caused numerous accidents involving cars and trucks with shifting loads going out of control. Somehow the promises to straighten the "S" curves have vanished---they are not on the R-2237 B plans do they appear on these plans. The "S" curves are the most dangerous section of US 321 between Patterson and Blowing Rock and the curves need to be straightened to meet horizontal curve design criteria and improve safety.

WHETHER THE WIDENING OR BYPASS ALTERNATIVES ARE SELECTED THE "S" CURVES NEED TO BE FIXED.

The remaining 5 CCBR criteria (See DEIS p. 2-12) remain valid now as then. If NCDOT had heeded them in 1997,we would not be considering the DEIS but building a road. We all want a 4 lane road but not one that makes Blowing Rock "have a more urban feel, reducing the current small town atmosphere of this resort community " (DEIS p. xiv).

DO THE RIGHT THING: BUILD A TRUE BYPASS. IT WILL BE HARD BUT YOU HAVE THE ENGINEERS CAPABLE AND EAGER FOR THE CHALLENGE OF DESIGNING A TRUE BYPASS AT A REASONABLE COST.

The 1997 comparison of potential bypass alternatives (DEIS TABLES 2-1 and 2-2) provide an interesting comparison of changing costs-- the widening alternative shows a 1996 construction cost of 24.5 million but the current construction cost is only 23.4 million--a reduction of 1.1 million dollars. However, the construction cost of bypass alternative CC-C1 in the 1997 study of 91.0 million escalates to 161.1 million for Bypass 4A or 241.4 million for Bypass 4B. It appears that the costs reflect the choice NCDOT wants to make. Estimate the preferred widening alternativas as low as practical and if built expect a 50-60%overrun. And conversely, estimate the disfavored alternatives with rhe expectation that they will be rejected as too costly. Cost estimates must reflect real costs and be defendable upon examination not numbers on a rubber sheet to be stretched and twisted to satisfy a predetermined solution.

Section 2.3.5

Transportation System Management (TSM) might be the temporary solution to the obvious dislike of the citizens in the project area to both the widening and bypass alternatives. NIMBY is alive and well with almost an even split--widening favored by people living in rural areas through which a bypass would be sited and the bypass favored by the residents of Blowing Rock fearful that a 4 lane highway through the center of the town would destroy " the current small town atmosphere of this resort community" (DEIS p. xiv).

TSM might be a wonderful way out of the problem of an equally split electorate-- either decision alienates 50% of the voters. The potential strategies (DEIS p.2-42, 43) would relieve the LOS problems for the next 10-15 years during which a permanent solution to traffic flow in the areacan be developed.

An addditional strategy not listed in Section 2.3.5 might alleviate most of the problems caused by slow climbing trucks between Blackberry Road--a third lane north bound which would allow designation of "ALL TRUCKS LANE" permitting the rest of the traffic to experience LOS C or better on even peak traffic days. I have observed this situation in Pennslyvania to handle very heavily loaded coal trucks.

The costs of this modified TSM should be minimal and the practical benefits impressive at least for the near-term. A simple solution to a complex problem.

The Widening Alternative as presented fails to satisfy the letter and intent of the HFUA "to provide high-speed, safe travel service*** and provide safe, convenient through-travelfor motorists*** to support statewide growth and development objectives ." Section 136-178.

The DEIS states that GRADE DESIGN CRITERIA EXCEPTIONS will exist along the widened section (DEIS p. vii). These include steep grades of up to 10% compared to the desired 6% maximum. The excessive grades on the existing route are responsible for the LOS F rating and will NOT be corrected. In fact, 2.1 miles of the widened route will have grades greater than 7% (DEIS p.2-14).

The DEIS states that DESIGN CRITERIA HORIZONTAL CURVE EXCEPTION will exist along the widened section with sharp curves between Blackberry Road and Green Hill Road and within Blowing Rock. There will be 7 instances of design requiring speeds below 45 mph and 5 with speeds less than 30 mph (DEIS p. 2-15).

The DEIS notes (DEIS p. 2-47) that vertical and horizontal curves that do not meet design criteria will " be flattened" but it does not state that all such curves will be brought to design standards. The failure to meet design standards as noted in several places in the DEIS seems to be irresponsible and unnesessarily DANGEROUS to the tens of millions of people using the highway during its lifetime and might expose the NCDOT to liability for such deviation.

The DEIS notes that design exceptions were made to avoid "addidtional earthwork and right of way acqyusutuibs" (DEIS 2-52) but provides no data to show whether the cost saved is reasonable compared to the risk to which the driving public,relying on NCDOT for safe highways, is exposed. Such data should be part of the information made available to the decision-makers and the public in a properly crafted DEIS.

The DEIS states that slope criteria were developed based on the 1998 NCDOT geotechnical survey. This survey is inadequate for such a design function for the reason provided in the comments to Section2.1.3. A local expert has cast doubts on the validity of parts of the geotechnical survey. More work needs to be done before the final decision is made.

The DEIS, in a later section, states that "detailed geotechnical studies will be conducted during the project design. This is totally unacceptable when the need for blasting in the vicinity of historic structures, occupied dwellings, and the Blowing Rock natural formation (a state treasure) is known. Cost is used as a reason to violate the Green Park Historic District. How can NCDOT know how much the cost of widening the road past the Green Park Inn will be impacted by the need

for special precautions for blasting in the vicinity of the historic structure built on rubble and log foundations?

The DEIS notes (DEIS p.2-48) that an approved (but not yet started) condominium development west of US 321 across from the Blowing Rock Country Club Golf Course would be displaced (taken) , but this is not reflected in the community impact.

The DEIS notes (DEIS p. 2-52) that all intersections will remain at grade and I wish to note that the intersection of Goforth Road in the Green Park Historical District enters at a steep grade and must be reconstructed. To have a levelintersection at grade will require Goforth Road to be raised to the level of the second floor windowsin the Green Park Inn.

The DEIS notes that due to "limited sight distance" a left turn lane is required at Green Hill Road, and I agree. However, this will further increase the danger to pedestrians from the Green Park Inn because traffic will be at high speed and not having to slow for turning traffic. A pedestrian-activated d signal must be provided for safety.

The DEIS rejects the notion that a left turn lane is required at Norwood and Country Club Lanes noting that the proposed four lanes will provide adequate capacity for through traffic and turning traffic (DEIA p.2-52). This is not true when traffic data that is current is used-- the road will be overtaxed and obsolete by the time it is completed and the amount of left turn traffic at these streets will exacerbate this problem.

The DEIS states that the Country Club and Norwood Circle intersections should be safer because the straighter alignment will increase sight distances for turning drivers. The DEIS fails to note that in this area there are design exceptions for curvature and line-of-sight and the higher speed made possible by the straighter alignment and the need to cross 4 lanes of traffic will more likely make such turns more dangerous. The same holds true for the Pinnacle Avenue intersection and Canyon's Restaurant parking lot..

The DEIS notes that some means of alerting motorists to pedestrians crossing US 321 would be provided. These methods, crosswalk markers , advance warning signs and crossing signs have never been effective in slowing traffic, so the thought of Green Park Inn visitors and others crossing 321 in safety is unrealistic. In addition, the left turn lane at Green Hill Road will require that pedestrians cross 5 lanes of traffic leaving the Green Park Inn to go to the parking lot on the other side--frequently after dark--a recipe for diaster.

The DEIS shows that the existing sidewalk in front of the Green Park Inn is within the planned construction easement (and) will be replaced . A stone wall over 100 years old will be destroyed. Why does a construction easement have to be planned

that will adversely affect this historic structures? Even replacing this historic wall is not as good as not destroying it at all.

The DEIS notes there will be no control of access (DEIS p.2-55) and this is the FATAL FLAW of the proposed route through Blowing Rock because there are 81 cuts in the 2.1 miles in Blowing Rock and this load of traffic entering and leaving the highway will make the road obsolete upon completion by increasing accidents.

The DEIS states that the widening alternative "would help reduce accidents in Blowing Rock and increase safety. (DEIS p. 2-60) That statement is pure conjecture as noted in previous comments. Average accident rates are meaningless in a proper safety study and the NCDOT has failed not only to use the most current data but also has failed to conduct a detailed evaluation of its own individual accident reports. The DEIS fails to factor in the effect of massive discontinuities in traffic flow caused by 81 cuts in the 2.1 miles of Blowing Rock and the "U" turns made necessary by the median through Blowing Rock.

The DEIS shows median cuts at Ransom Street, Traillen Avenue (now Church Street) and Sunset and mentions that such cuts shall be used for "U" turns but fails to account for the accidentsthat surely will occur as a result of these turns. DEIS further provides that the 16-foot median and associated left turn lanes should reduce accidents involving turning traffic. The effect on traffic flow caused by changing the traffic pattern from turning left into a business on the other side of the road torequiring "U" turns to reach the businesses is much more likely to increase greatly the accidents relating to turning traffic than to reduce them. Add to this the probable increase in speed expectations of drivers on a four-lane highway and the most likely scenario is an increase in number and severity of accidents.

The DEIS shows the widening alternative Blackberry Road to Blowing Rock town limits will be 4 lanes with a four-foot painted median . This, in my opinion, should be replaced with a concrete divider especially in the areas of steep grades and "design exception" very sharp curves. Accidents on this section in the past involve crossing the center line and include head-on collisions and running off the road. These will be prevented with a concrete divider with no additional right-of-way required.

The DEIS shows a 45 miles per hour posted speed from the vicinity of Blackberry Road to the Blowing Rock Town Limit which is SLOWER than the current posted speed and is contrary to the objective of HTFA and the TIP to improve traffic flow. What is the reason for the slower posted speed on the "improved" road when according to DEIS this improvement will "increase the road's safe operating speed" .

The DEIS shows a four-lane road with no median through the Green Park Historic District in an effort to minimize impacts to thie Section 4(f) property . Safety considerations including the requirement of design exceptions for speed, line-of-sight distance, curvature , and superelevation should preclude this portion of the project. The use of a bypass around Blowing Rock with no design exceptions would provide much safer segment than the widening alternative. In addition, the bypass will have room for future expansion that may be needed and which is not available if the road is widened through Blowing Rock. If NCDOT is preparing to have 6 lanes from Hickory to Lenoir, how long will it be before NCDOT wants 6 lanes from Lenoir to Boone?

The DEIS notes the alternative will not attract additional traffic other than as the result of economic growth in the area served. This is absurd on its face and every highway plannerknows traffic expands to fill the roads built. This has been true for the past 50 years--if the road is good, people will take trips they normally not take. In my experience, I now go to Boone almost daily (and frequently more than once a day) while before the improvement the trip was so long that we seldom went more than once a week. I fully expect that trips to Lenoir will similarly increase after the road is completed. The road will generate new traffic and it is unreasonable to say that it won't.

The NCDOT has stated that interstate highway traffic will not use US 321 because it will take longer than using the interstate system. This ignores the reason many truckers use the backroads--to avoid the weigh stations. A check with members of the Blowing Rock Rescue Squad notes that in each case of truck overturning,the truck was OVERLOADED. I was present at 4 of the incidents--2 involving lumber trucks and the other two involving hazardous materials (toluene and herbicide). The toluene truck was from Ohio and according to the NCDOT reasoning should have not been using US 321.

The DEIS cost estimates continues the guessing nature of the previoous sections showing the estimated construction cost to be 32.7 million compared to the EA estimate of 48.1 million(shown as 25.6 million in TIP 93-99) and Right-of-Way cost of 13.3 million (9.3 million in TIP 93-99). The DEIS construction cost does not include any special blasting costs(because the required geotechnical studies have not been done), does not include the cost of underground storage tank removal (at least7) and potential hazardous waste sites in the construction area. The underestimated construction costs are essential to support the DEIS determination in Section 4(f) that the cost of a bypass is too high to be a "feasible and prudent alternative" to using the Green Park Historic District.

The DEIS notes that two travel lanes will be open "most" of the time and closure as required will be done in "off-peak"

travel hours. This is hard to believe when a simple repair of a few hundred feet of road shoulder caused a 20 minute closure of US 321 for 2 days this spring with 20 minute delays in each direction. For the NCDOT, 20 minutes is defined as a "short closure (DEIS p. 2-56) but to a business traveler to Hickory a 40 minute delay--20 minutes each way--increases travel time by a half.

The DEIS notes that "short closures amd pilot car operation" for "blasting the muck removal" on 7 of the 20 sections of the widening alternatives. The length of disruptions noted range from 10 weeks on Section 3 to 10 months on Section 18. Section 20 involves the rock cut below Cliff Dwellers Inn for which the NCDOT proposed as an option a detour on North Main Street, Ransom Street and Sunset Drive for a period of 6 weeks during the construction (tourist?) season with the alternative being 5 months of short closures to blast and remove rock. All the "short closures" , pilot car operations, blasting and mucking will greatly impact through-travel for the estimated 4 year construction project, bankrupt merchants along Valley Boulevard and severely impact tourist business in the rest of the town.

A bypass lets 2 lane traffic flow continue as present in Blowing Rock while construction takes place elsewhere and, as if by magic, when the bypass is completed there are 6 lanes and 2 physically separated routes along US 321 from Boone to Lenoir.

The NCDOT has previously stated (not this DEIS) that blasting will only occur during off-peak hours (this has nothappened on the work on US 421) and that blasting debris will be contained to minimize the need for road clean-up (this certainly was not done when the debris scattered well out of the designated area and closed US 421 for a considerable period). In addition, a "blasting mistake" at Kirby Mountain Road (at the North End of R-2237A) closed US 321 from about noon Friday until Monday noon requiring a detour through North Wilkesboro and US 421. The record of blasting mistakes under NCDOT contracts and lack of geotechnical studies does not give a strong feeling of confidence for blasting near historic structures, occupied houses, motels, inns, and The Blowing Rock especially when the NCDOT designated "Blasting Expert" at a public hearing in Patterson could not "guarentee"that the blasting would not damage the Green Park Inn or The Blowing Rock--the two treasusres of our town and North Carolina.

The DIES notes that timing of operations is the responsibility of the contractor and in another section that construction operations will be generally restricted to daytime hours. What requirements must be met before the construction contractor can work in other then dayatime hours? Will any blasting be permitted in other than daytime hours? Who has the final decision? These are questions that need to be answer before a decision is made.

The DEIS fails to discuss ground-borne vibration associated with blasting and the potential for it to damage structures and how it will be controlled. At an early Public Hearing in Patterson, there was a request for studies to determinme the potential for damage to the Green Park Inn and the answer was it would be done after project approval. Here, once again the true cost of construction along the preferred alternative is understated and the comparison to the cost of the bypass is further flawed. The costs of inspections, soil, and geotechical data collection and the extra precautions needed to protect such structures from blasting-relataed vibration must be included in the construction cost to have a valid comparison to the cost of the bypass. In addition, the increased costs of "small-charge blasting", modelling, restrictive limits for historic structures, crack monitoring in sensitive buildings and vibration mitigating procedures must be included in preferred alternative construction costs--and this has not been done in the DEIS.

The DEIS asserts that the widening alternative " would improve traffic operations along the entire length of US 321 to LOS D or better through 2025 (DEIS p. 2-60). The DEIS further asserts it will achieve LOS C at all locations except from US 221 to Shoppes on the Parkway. This appears to be implausible under the constraint of massive left and "U" turning at mediancuts and 81 curb side cuts within 2.1 miles.

The DEIS further asserts that the widening alternative "would help reduce accidents and increase safety along existing US 321 " (DEIS p.2-60). I disagree for the reasons stated in comments to Section 1.5.1.

Section 2.4.2

Bypass Alternatives 1A and 1B are denominated the "No
however, Bypass Alternatives
of building a "strawman"--an
to ensure its destruction
, makes the entire DEIS suspect. The obvious intent of the design seems to be to select routes that would fail to meet the preconceived notations of what is a "feasible and prudent alternative" to using the Green Park Historic District. A reasonable person looking at the selected bypass route might be led to believe that the route selected MAXIMIZED the number of houses to e taken, the potential for community adverse impacts, and cost of construction.

Alternatives 1A/1B also may have had anoather purpose, the division of the citizens of Blowing Rock--and it succeeded. The residents along the routes of Bypass 1A and 1B were terrified at the thought of such a road through their neighborhood that they would agree to anything--even widening --to prevent it. Thus, the small town closeness of Blowing Rock has been shattered and will take years to heal, if ever in my lifetime.

The Key Design Criteria for alternatives 1A and 1B suffer from the same problems for the Widening Alternative because cut and fill slopes use the 1998 NCDOT Geotechnical Survey that is , as noted in the Section 2.4.1 comments, inadequate for such a design function. In addition, the use of this geotechnicaldata to support the design of the cut in Gideon Ridge and the Gidion Ridge tunnel is frightening.

The DEIS states that Grade Design Criteria exceptions exist along Bypass Alternatives 1A and 1B as they follow the existing roadway to Gideon Ridge including grades up to 7% compared to the desired 6% maximum. The excessive grades on the existing route will NOT be corrected. (DEIS p. vii)

The DEIS states that there are n horizontal curve exceptions on Bypass Alternatives 1A o 1B from the start of the project area to Blackberry Condominiums. North of Blackberry Condominiums, Bypass Alaternative 1A has curves that do NOT meet the horizontal design criteria. The curves should be corrected in the final design if possibl

Bypass Alternative 1B has no horizontal curve exceptions by straightening the sharp curves of Bypass 1A with a deep cut into Gideon Ridge.. The concept is good but given the inadequacy of NCDOT's geotechnical data such a cut needs serious geotechnical and design studies. The rock on Gideon Ridge is among the oldest exposed rock on earth and has a tendancy to "shed" large chunks when subject to either rain or melting snow so it hardly seems to be a likely condidate for a "deep cut" or tunnel.

The remainder of the routes of Bypass Alternatives 1A and 1B appear to be realistic in terms of construction ease and access. The two negatives to these routes are the impact on existing residences and neighborhoods, and the massive earthwork required. The costs seem reasonable.

Analysis of aerial photographs and topographical maps show that a slight change of route--staying at the 3,400 foot contour avoids the incursion into the Green Hill area and then swinging to parallel the Blue Ridge Parkway Boundary and then joiningPossum Hollow Road avoids having to take any houses.

Earthwork for Bypass 1A requires transportation of fill from north of Green Hill Road to south of Gideon Ridge and would produce 250,000 cubic yards (or 28,000 truckloads) of suchmaterial. Earthwork for Bypass 1B is even more massive resulting in 1.4 million cubic yards of waste material which will require 155,000 truck trips to haul off this material. The earthwork amounts and imbalance seems to indicate a design that failed--or perhaps, a design that was intended to fail. Earthwork should be reassessed in the final design process. Even as is, Bypass Alternative 1A and 1B are viable but could be improved.

BYPASS ALTERNATIVES IA AND IB EACH PROVIDE A PRUDENT A PRUDENT AND FEASIBLE ALTERNATIVE TO USE OF SECTION 4(f) PROPERTY IN TERMS OF ABILITY TO SERVE THE PROJECTS PURPOSE AND NEED AT A REASONABLE COST.

Bypass 4A and 4B are true bypass alternatives and either will satisfy the requirements of the HTFA, the TIP, and the Project. Each meets the letter and the intent of the HTFA "to provide high-speed, safe travel service...and provide safe, convenient through-travel for motorists...to support statewide growth and development objectives" . Section 136-178

The WIDENING ALTERNATIVE FAILS each of the HTFA requirements of high-speed , safe travel, convenient for through travel. Jamming the 2025 average traffic 27,450 vehicles--high speed through-travelers comingled with extensive local, slow-speed elderly drivers and tourists wandering about a small town witha 35 mph posted limit is NOT HIGH SPEED, NOT SAFE, NOT CONVENIENT FOR THROUGH TRAVELERS, AND DOES NOT SUPPORT THE STATES ONLY GROWTH INDUSTRY, TOURISM.

Having determined that the widening alternative fails to meet HTFA requirements and Bypass Alternatives 4A and 4B do satisfy HTFA, we must determine whether 4A and 4B is designed to be the best use of highway funds. In my opinion, either one is a valid use of funds but can be improved in the final design process with large savings in costs.

Bypass Alternatives 4A and 4B "completely bypass the Town of Blowing Rock" (DEIS p. 2-69). That is what any true bypass does in this state and elsewhere. That is what the PEOPLE OF BLOWING ROCK WANT BY A 2 to 1 MARGIN on all surveys regardless of which group does the surveying. That is what the series of Resolutions by the Blowing Rock Town Commissioners want. That is the RIGHT thing to do.

Bypass Alternatives 4A and 4B are "almost entirely on a new location in rural area". (DEIS p.2-69). Most bypasses are so sited. And, as in this case, rural residents object to ANY use of the land for a bypass:invoking family history; love of the land; nature; the old fashioned life. Nobody likes change and NIMBY (Not In My Back Yard) rears its head. But life moves on and the land so eulogized is eventually sold and developed.Houses grow where wildflowers used to flourish. So goes it in Aho and Blackberry Valley--it has already begun in both places and will continue whether a bypass comes through or not. Standing at the Laurel Fork church during the NCDOT meeting, you could see a hundred or so houses most built in the last decade in what the Aho residents lionized as a perfect rural community. Similarly, development is alive and well in Blackberry Valley and will accelerate as soon as Blackberry Road paving is completed. In fact, a bypass route high on the escarpment andwith a no access policy, may actually slow down development in the Valley by preventing development working its way down from the top of Green Hill like occurred in Laurel Park and elsewhere in the area. Thus, a bypass based on Alternatives 4A and 4B could actually help preserve some of

vistages of life in Blackberry Valley so idealized in the NCDOT Public Hearing on August 26, 2002.

The DEIS notes in discussing key design criteria that cut and fill slopes and retaining walls follow the same criteria as the widening alternative. (DEIS p. 2-69). This is positive in that consistancy aids the design process but is negative because the slope criteria were developed based on the 1998 NCDOT geotechnical survey. This survey is inadequate for such a design function for the reasons provided in the comments toSection 2.1.3. A local expert has cast doubts on the validityof parts of the geotechnical survey. More work needs to be done before the final decision is made.

Efforts to balance earthwork (excavation/fill) were successful with minimal need for borrow/waste. However, in examining the routes of 4A and 4B on topographicall charts it is obvious that minor alignment changes can eaily reduce the amount of earthwork/bridges and reduce construction costs.

DEIS notes that only Bypass Alternative 4A and 4B have NO DESIGN CRITERIA EXCEPTIONS. (DEIS p.2-70). This is a good start for a safer road compared to all the other alternatives.

Route selection for Bypass Alternatives 4A and 4B appears reasonable but not optimum . After examination of the routes of 4A/4B on topological charts it appears that a better route choice on the escarpment would be to remain at a lower altitudetransiting between Locust Ridge and the Blue Ridge Parkway using a steady rate of climb from 3100 feet at Locust Ridge to about 3600 feet at the Blue Ridge Parkway. This would also limit grades to the desired 6% instead of the excessive grades of 7.48% indicated for Bypass Alternatives 4A and 4B.(DEIS p.2-49).

The DEIS notes that unpaved rural roads will be altered by Bypass Alternatives 4A and 4B as should be expected but it should be possible to control access from adjoining properties. Such control of access serves two main purposes--safety and control of roadside development. Either of these Bypass Alternatives carefully designed and properly built with CONTROLLED ACCESS THROUGHOUT will not only satisfy HTFA for high-speed, safe, and convenient travel for through traffic but could be an asset to the area by opening the vistas of Blackberry Valley and Aho without encouraging sprawl-type development. Properly designed and built, with careful revegetation of slopes and roadsides, and use of green/brown concrete for retaining walls/bridges (not the stark white in the NCDOT photographs) the road could become a "must visit"location like the Lynn Cove Viaduct. In fact, the views of such a road from Thunderhill Overlook and the Blackbery Condominiums would be quite different than the photographsprovided by NCDOT in its handout and in the DEIS. (DEIS figs. 4-4, 4-7 and 4-9). For an idea of what the completed

road would look like, take the photographs in Figures 4-4, 4-7, and 4-9 and color all the cuts dark green (revegetation), all the retaining walls/bridges dark green or brown. The bridges, or at least one of them, could be left white for the Lynn Cove Viaduct look if that would please the Blue Ridge Parkway. The road will fade into the landscape as revegetation occurs and within a short period after completion it will be much less a distraction than the development in Blackberry Valley, In fact, it will not adversely affect the Thunderhill Overlook view but enhance it.

DEIS tunnel design characteristics provide evidence that NCDOT plans to use cost as its argument tha Bypass Alternative 4A and 4B are too expensive to be "feasible and prudent " alternatives to using Section 4(f) property. The original design for a tunnel bypass of Blowing Rock, submitted by CCBR , places the tunnel bypass more to the east and at a lower altitude withgrades set at 6% desired and keeping the road farther below the houses on Green Hill Road. This also permitted the tunnel to pass under a narrow portion of the Blue Ridge Parkway ROW and a total tunnel length of 800 feet or less. 800 feet is critical because it permits an inexpensive, short, safe, self ventilating tunnel like all of the tunnels on the Blue Ridge Parkway. NCDOT, however, chose to site Bypass Alternatives 4A and 4B considerably farther to the west and at a higher altitude (nearer to the houses on Green Hill). This choice of routes by NCDOT also caused the tunnel under the Blue Ridge Parking to cross at a wider point. The tunnel, as sited and designed by NCDOT shows a portal-to-portal length of 1500feet.

NCDOT choice of location caused the tunnel length to exceed 800' and brought into play a series of requirements suitable for a major tunnel under a river like the Lincoln Tunnel in New York City. These requirements include elevated pedestrian walkways, cross passages, closed circuit TV, smoke and heat detectors, exhaust emission sensors with all information continously displayed in the control room of the Administration Building. In addition, NCDOT wants the tunnel to be a manned facility operating 24 hours per day 7 days a week with a total of 29 full-timepersonal including 1 supervisor, a 3 personadministration group, 5 control room operators , a 9 person emergency response team, and a 8 person maintenance group. NCDOTalso requires several vehicles to support tunnel operations, an emergency vehicle garage, about 50 parking spaces and a helipad. This is truly the TAJ MAHAL OF TUNNELS STAFFED BY A VERITABLE ARMY--overkill at its worst and an obvious attempt to foreclose consideration of the "Tunnel Alternatives". Compare the CCBR siting decision with a tunnel of 800', self ventilating, and unmanned like most, if not all the tunnels on the Blue Ridge Parkway at a construction and operation cost well below NCDOT's gold-plated version. The DEIS fails to provide any cost information on the construction and operation of thetunnel how much the cost estimate would be reduced by siting for a tunnel of 800 feet. This cost information is essential

for any reasonable selection decision.

The DEIS provides information on tunnel portal location, site geological conditions, and related matters. Again, and especially in this area of the project, any reliance on the 1998 NCDOT geotechnical survey (noted in Section 2.4.1 comments) appears to be misplaced according to a local expert and is inadequate for such a design function.

The cost data for Bypass Aternatives 4A and 4B is inadequate for a reasoned decision; a breakdown of cost elements is essential to understanding what factors should be examined in the final design stage to possibly reduce cost or enhance the design.

BYPASS ALTERNATIVE 4A and 4B EACH PROVIDE A PRUDENT AND FEASIBLE ALTERNATIVE TO USE OF SECTION 4 (f)PROPERTY IN TERMS OF ABILITY TO SERVE THE PROJECT'S PURPOSE AND TO SATISFY THE REQUIREMENTS OF THE HFTA.

RONALD J. OBERLE
MOST HIGH II
BOX 765
BLOWING ROCK, NC 28605
(828) (704) 295-4101
9/20/02

William D. Gilmore, P.E.
Project Development and Environmental Analysis Branch
N.C. Department of Transportation
1548 Mail Service Center
Raleigh, NC 27699-1548

Letter 3 of 5
Page 1 of 11 incl. Attachments 3

Re: US 321 Improvements Project
Federal Aid No. NHF-321 (1)
State Project No. 6.7939001T/
TIP No. R-2237C
Caldwell and Watauga Counties, NC

Dear Mr. Gilmore, P.E.:

Thank you for permitting me to comment concerning the areas in the Draft Environmental Impact Statement (DEIS) and Draft Section 4(f) Evaluation dated June 3, 2002, for the subject project. In order to facilitate your review and to expedite your response to these comments, I will provide a separate letter for each section for which I wish to comment. This letter comments on Section s 3.1.1, 3.1.2, 3.1.3, 3.1.4, 3.1.5, and 3.4.2, 3.8.3, and 3.9.

These comments are included as separate attachments.

Very truly yours,

Ronald J. Oberle

Attachments

Section 3.1.1

The DEIS states (DEIS pp. 3-1/2) some of the reasons why the NCDOT should be doing everything in its power to preserve the Town of Blowing Rock rather than being unyeilding in its efforts to destroy it. The DEIS admits that a widened US 321 "would give the Town of Blowing Rock a more urban feel, reducing the current small town atmosphere of this resort community". (DEIS p. xiv). Why would any rational person be so intent on widening to risk destroying a resort community that has been one of the South's main summer resorts--and risk losing the economic benefits of tourism to the area and the state ?

The DIES further admits that the widening would have an adverse effect on the Green Park Inn (DEIS p. xiv) that has been the signature structure of Blowing Rock from its initial construction in 1882. It is ironic that the current US 321 route, the widening of which might cause the destruction of the Green Park Inn--or its econimic viabiity, runs along the same route as the original toll road, the Lenoir Tunpike, built to bring visitors to the Inn and summer residents to Blowing Rock.

No one in Charlotte, Raleigh, or any other population center in the region says "Lets go to Boone or Lenoir for the weekend!", but many tens of thousands say each year as they have said for 150 years "Lets go to Blowing Rock." Do you think they will come here to enjoy the "more urban feel...(of a widened US 321 or the)...current small town atmosphere of this resort community"? (DEIS p. xiv). ~~The visitors~~ have come here for 150 years and continue to come in ever increasing numbers--and not for the urban feel. Speed up through-traffic on a properly designed bypass and reject the notion that jamming the 87% of through traffic (DEIS p.2-6) through this small resort community is a sound and rational engineering solution to the problem of increasing traffic volume along US 321.

North Carolina and many other states have discovered and are fostering historical-based tourism. Northwest North Carolina has only one economic base that is expanding--tourism. NC DOT should do nothing that might diminish, and probably destroy, the most viable historical-based tourist destination in northwest North Carolina.

NCDOT should consider that this area has only two thriving and growing entities: tourism which provides over 25% of all jobs in Watagua County (DEIS p.3-7) and ASU. Even ASU can be considered tourism based because most of its students first came to know about ASU when they visited the Blowing RocK area with their parants. My son did and many others I know also did.

Why is NCDOT willing to risk killing the goose that has laid golden eggs for the Northwest mountains for over 150 years?