

Chapter 7

**Comments and
Coordination**

7.0 COMMENTS AND COORDINATION

An Environmental Impact Statement (EIS) that addresses the full range of alternatives and issues important to the selection of a preferred alternative can be accomplished only in consultation with those who have a stake in that decision. This chapter describes the scoping process, agency coordination process, and public involvement activities, as well as the key issues and pertinent information received through these efforts during preparation of the Draft Environmental Impact Statement (DEIS). It also describes the activities associated with the public and agency review of the DEIS and presents responses to comments on the DEIS. Finally, this chapter describes activities associated with the development of a Memorandum of Understanding with the Town of Blowing Rock and a Memorandum of Agreement with the State Historic Preservation Officer (SHPO) and the US Army Corps of Engineers (USACE) related to impact mitigation.

7.1 Earlier EA and FONSI Preparation

The US 321 improvements study began in late 1989 as the study of a widening project. The desire for a Blowing Rock bypass was first expressed at the first Citizens Informational Workshop on January 25, 1990 and again at a second workshop on June 21, 1990. Participants suggested numerous locations for a bypass.

In February 1991, a scoping letter was distributed to regulatory agencies requesting comments on several Blowing Rock bypass alternatives. The corridors discussed were based, in part, on citizen suggestions.

In 1993, an Environmental Assessment (EA) (NCDOT, August 1993) was prepared that recommended widening US 321 from NC 268 in Patterson to US 221 in Blowing Rock. It listed a widening project as the preferred alternative and concluded that a bypass around Blowing Rock was not reasonable.

Following a September 1, 1993 public hearing, a Finding of No Significant Impact (FONSI) was released in September 1994 for a widening project between NC 268 and Blackberry Road. Based on hearing and agency comments, the FONSI stated that an Environmental Impact Statement (EIS) would be prepared for US 321 improvements from Blackberry Road to US 221 in Blowing Rock and would include consideration of a Blowing Rock bypass.

Work on the DEIS began in 1995 with a new study of potential bypass alternatives. Sections 7.2 to 7.5 describe public and agency involvement during project scoping, study of potential bypass alternatives, and preparation of the DEIS. Other general outreach programs associated with the preparation of the DEIS also are described.

7.2 DEIS Scoping

Scoping is designed to encourage early participation of the public, elected officials, and interested governmental agencies in the decision-making process. The scoping process is intended to be a collaborative and cooperative process considering views from parties who will be affected by or who have an interest in the proposed project. Initially, the scoping process provided a mechanism to inform the public and governmental review agencies that an EIS was being prepared for the project. Subsequent input from the public and government agencies then helped to define the

project alternatives to be examined, to identify the impacts to be considered, and to establish the goals and objectives to guide the evaluation of the alternatives.

In August 1995, a scoping letter was distributed to regulatory agencies to solicit comments for the EIS study, initiate coordination for the project, and provide notice of an interagency scoping meeting, held on February 1, 1996.

7.2.1 Scoping Letter Responses

Responses to the 1995 scoping letter can be summarized as follows:

- Area public schools indicated that impacts from the proposed project were not anticipated.
- The NC Wildlife Resources Commission provided information regarding what natural resource issues they would like to see addressed in the EIS.
- The NC Department of Environment, Health and Natural Resources (DEHNR) (now the Department of Environmental and Natural Resources) Divisions of Environmental Management, Land Resources, and Soil and Water Conservation also provided information regarding what natural resource issues they would like to see addressed in the EIS.
- The DEHNR Division of Environmental Management (now the Division of Water Quality) indicated that alternatives other than widening would result in significant wetland and water impacts.
- The DEHNR Division of Forestry submitted comments indicating that they were in favor of the Widening Alternative only because of the potential impacts a bypass would have on woodlands. They also indicated what information regarding woodlands they would like to see presented in the EIS.
- The NC Department of Cultural Resources (State Historic Preservation Officer) indicated that the alternatives and their areas of potential effect presented in the scoping letter were unlikely to impact archaeological resources.
- Region D Council of Governments' Transportation Advisory Committee submitted comments supporting the concept of improving US 321 to a multi-lane facility.
- The Town of Blowing Rock was opposed to widening US 321 through Blowing Rock.
- Watauga County endorsed the proposed project.
- The National Park Service indicated that they would object to any bypass that would adversely impact Blue Ridge Parkway lands or viewsheds and/or significantly alter natural, cultural, or visual resources.
- The US Fish and Wildlife Service (USFWS) indicated that they prefer widening the existing alignment rather than pursuing a bypass alternative. The USFWS also provided an updated list of federally protected endangered and threatened species known from Caldwell and Watauga counties that may occur within the area of influence of the proposed bypass.

7.2.2 February 1, 1996 Agency Scoping Meeting

A meeting was held with representatives of federal and state regulatory agencies on February 1, 1996. Agencies represented included:

- Caldwell County
- Town of Blowing Rock
- Federal Highway Administration
- NC Department of Cultural Resources (State Historic Preservation Officer)
- NC Department of Environment, Health and Natural Resources
 - Division of Environmental Management
 - Wildlife Resources Commission
- NC Forest Service
- US Army Corps of Engineers
- US Fish and Wildlife Service

After discussing the progress of the project since the last Steering Committee meeting in 1991, the project's study team presented its findings related to:

- Potential bypass alternatives and their concept origin
- Traffic forecast observations
- Level of service results
- Capacity-sensitive analysis
- Crash analysis
- Median safety study

The presentation also included a discussion on observations about the bypass alternatives, the merits of crossing the Parkway in a tunnel, and recommendations for the rest of the study.

7.2.3 Citizen Participation in Scoping

The public was involved in scoping in two ways, first through a citizens informational workshop held in August of 1995 and second through the initial meetings of the Citizens Advisory Committee. Both of these efforts also were a part of the project's bypass alternatives study and are described in the next section.

7.3 Bypass Alternatives Study

The project's study team conducted a bypass alternatives study (described in Section 2.2 of Chapter 2) from 1995 to 1999. Citizen involvement opportunities included two citizens informational workshops and five meetings of a Citizens Advisory Committee. In addition, an Interagency/Steering Committee meeting was held on December 17, 1996 at which an alternatives assessment questionnaire was circulated. In March 1999, the Secretary of Transportation presented a proposal for the alternatives to be evaluated in the DEIS at a meeting of the Town Council of Blowing Rock, County Commissioners for Caldwell and Watauga counties, and the Citizens Advisory Committee.

7.3.1 Citizen Involvement

Citizen involvement activities that took place as part of the bypass alternatives study included:

- Citizens informational workshops that provided an opportunity for the general public to discuss the study and its findings with members of the study team. Two citizens informational workshops were held. At both workshops, the agenda was informal. The public was invited to come at any time during a three-hour period to see the land suitability map, the potential bypass alternatives (at the second workshop), ask questions, and give comments to study team members.
- Citizens' Advisory Committee meetings. This committee was formed to allow citizens of the project area to participate in the planning process and to meet regularly with the study team. It consisted of 14 members and served as an advisory body to help the NCDOT develop a project that offers a reasonable balance of the diverse issues associated with the project. The committee consists of representatives from the following government or civic organizations: Blowing Rock Town Council; Watauga County Board of Commissioners; the North Carolina Alliance for Transportation Reform; the Blowing Rock Community Club; the Concerned Citizens of Blowing Rock; the Blowing Rock Chamber of Commerce; the Blowing Rock Merchants Association; the Blowing Rock Historical Society; the Concerned Citizens of Blackberry Valley/Bailey Camp (added in March 1996); the Aho community; the Caldwell County Board of Commissioners; Appalachian State University; and the Blowing Rock Neighborhood Coalition (added in August 1996).

Other general citizen outreach programs are described in Section 7.5 and included a newsletters, a toll-free project information line, and a website. The Citizens Advisory Committee meetings and the citizens informational workshop meetings are described in chronological order in the sections that follow.

July 12, 1995 Citizens Advisory Committee Meeting

The purpose of this meeting was to review the role of the Citizens' Advisory Committee, to elect a committee chairperson, and to describe the project's history, its current status and the scope of work for the EIS. The group also discussed the types of issues to be addressed when comparing bypass alternatives. Specific concerns raised by committee members included:

- The environmental and community impacts associated with a bypass would be greater than those associated with the widening;
- Countywide impacts, rather than only impacts to Blowing Rock, need to be assessed;
- Safety should be the overriding factor when choosing a bypass or widening alternative;
- Widening the road would have adverse impacts on the Green Park Historic District; and
- A bypass will be necessary even if the existing road is widened.

The committee also requested that a copy of crash records for the area be sent to members.

August 29, 1995 Citizens Informational Workshop

The August 29, 1995 Citizens Informational Workshop was held in Blowing Rock to present a land suitability map showing community, cultural, and natural features in the project area and to solicit comments on the study, alternatives, and potential environmental impact issues. The desire for an alternative that crossed the Blue Ridge Parkway, including a tunnel crossing, was expressed.

At this meeting, 194 persons registered their presence. Key issues raised at the workshop related to support for a Blowing Rock bypass, support for widening US 321, the development of alternatives, and the land suitability map.

Supporters of a Blowing Rock bypass said they believed that widening US 321 would:

- Spoil the character of Blowing Rock;
- Adversely affect the historic district;
- Close businesses along US 321 during construction;
- Encourage unsafe speeds and cause more crashes;
- Cause structural damage during blasting;
- Jeopardize the safety of students who cross US 321 walking to and from school;
- Increase truck traffic in Blowing Rock;
- Increase crime in Blowing Rock; and
- Become obsolete in a few years, necessitating a bypass anyway.

Supporters of widening US 321 said they believed that a Blowing Rock bypass would:

- Displace more people than the widening alternative;
- Adversely affect the area's natural beauty;
- Adversely affect the natural environment;
- Cost much more than the widening;
- Increase noise levels;
- Spoil views, thereby reducing property values; and
- Spoil views and serenity from Parkway overlooks.

November 11, 1995 Citizens Advisory Committee Meeting

A second Citizens Advisory Committee meeting was held on November 11, 1995 to review workshop and agency scoping comments, the land suitability map, and potential bypass alternatives.

The committee reviewed comments from the workshop and from agency scoping letters. Another topic was how to avoid sensitive features when selecting a bypass alternative. The majority of the time was spent on basic design concepts, potential location corridors, and typical section alternatives for the potential bypass alternatives. Specific questions and concerns expressed by committee members included:

- What is the National Park Service's reaction to a Parkway crossing?
- Will the Federal Emergency Management Agency (FEMA) be involved in the study?
- Why was a 1993 estimate of displacements associated with the widening different from a 1991 estimate?
- Should the taxpayers of Blowing Rock expect a tax increase to fund the relocation of utilities?

Several questions were asked about grades on the bypass and the cost of certain features like truck escape ramps. One member also asked that the study team explore a tunnel option in more detail. The committee expressed an interest in seeing the alternatives on a topographic map.

March 27, 1996 Citizens Advisory Committee Meeting

A third Citizens Advisory Committee meeting was held on March 27, 1996 to review traffic, level of service, and design criteria for the potential bypass corridors. The feasibility of a Parkway crossing from the perspective of the amount of traffic that would be attracted from existing US 321 was also discussed.

Functional designs for ten bypass alternatives were prepared. The alignments submitted by the Concerned Citizens of Blowing Rock representative were refined to form four corridors. A fifth corridor was a refined version of the bypass alternative presented as the "most reasonable" bypass alternative in the 1994 Environmental Assessment. Five additional corridors were developed by the study team and reflected alternative ways for passing through the Blowing Rock Assembly Grounds. The refinements to the Concerned Citizens of Blowing Rock's alternatives allowed them to more closely follow the existing terrain, reducing the amount of potential excavation and cost.

The focus of this meeting was traffic and crash studies. Study team members presented traffic forecasts and level of service and crash analyses for existing US 321 and for the potential bypass alternatives. The committee and study team also discussed the engineering trade-offs associated with the bypass alternatives that had been developed at that point and had questions regarding:

- The traffic model. Many questioned the accuracy of the model as well as the accuracy of the data put into the model.
- The 30th highest hourly volume and why road improvements are often designed to serve these volumes at an adequate level of service.
- The crash analysis. The committee wanted to know if it accounted for the higher speed of a four-lane road. Another member asked why there were more total crashes with the bypass than with the widening alternative. Comments were made regarding the severity of crashes.
- Whether or not truckers would remain on the existing route to avoid the grades on the bypass.
- The alternatives. Some committee members were concerned about community impacts in the Possum Hollow Road area, while others were concerned about the environmental and community impacts in the Blackberry Valley/Bailey Camp area. A majority of the questions and comments, however, were engineering-related (grades, bridges, costs, etc.).

July 31, 1996 Citizens Advisory Committee Meeting

A fourth Citizens Advisory Committee meeting was held on July 31, 1996. The purpose of this meeting was to present the ten initial potential bypass alternatives to the committee and to explain the criteria used to identify them. Similarities and small differences among the alternatives also were presented to the committee. Committee members were asked to identify the factors they considered most important in selecting bypass alternatives and to choose the alternatives, of the ten presented, that should be evaluated in the DEIS and compared to the widening alternative. The factors selected as most important by committee members, in order, were community impact, safety, efficiency of traffic movement, and cost. The majority of the members stated that none of the alternatives were acceptable either because they preferred the widening alternative or because they favored an alternative that completely bypassed Blowing Rock or crossed the Blue Ridge

Parkway. The NCDOT reaffirmed its decision not to pursue bypass alternatives that cross the Blue Ridge Parkway. Specific comments by committee members included:

- Each of the alignments is fatally flawed. It was stated that refinements to the alignments submitted by the Concerned Citizens of Blowing Rock had rendered them unacceptable because of steeper grades and greater community impacts.
- The NCDOT has not made a good faith effort to comply with Section 4(f) of the Department of Transportation Act of 1966 in its identification of bypass alternatives.
- None of the alignments meets the criteria for a safe highway. The study team assumed this comment referred to the grades of the potential bypass alternatives.
- What are the Blue Ridge Parkway restrictions?
- The corridors do not bypass Blowing Rock enough. Some committee members wanted an alignment that completely avoids the town limits of Blowing Rock.
- The information presented shows conclusively that a bypass is not a feasible alternative and that widening the existing road is the only practical solution. This view was shared by a few of the committee members who believed that engineering and environmental findings demonstrated that a bypass would not be feasible in this area.
- Although the widening alternative is preferred, Alternative E (assessed in Chapter 4 as Bypass Alternative 1A) is the best of the alignments being examined. This view was expressed by a committee member who, although he preferred the widening alternative, was able to select the alignment he thought should be in the EIS for comparison to the widening alternative.

August 1, 1996 Citizens Informational Workshop

The second Citizens Informational Workshop was held in order to present the potential bypass alternatives and their possible traffic, social, natural resource, and visual impacts. At this meeting, 239 persons registered their presence. Information was organized into five sets of displays, each staffed by a study team member(s) with expertise in that particular topic. The topics included:

- Criteria for identifying potential bypass alternatives;
- Engineering findings;
- Community and cultural resource findings;
- Natural resource findings; and
- Next steps.

Opposition to the potential bypass alternatives proposed by the study team was universal. Those who identified themselves as living in Caldwell County and in the rural areas in Watauga County generally supported the widening alternative. Most others indicated that crossing the Blue Ridge Parkway and building a bypass that is completely out of Blowing Rock was the only reasonable option.

At the urging of the Blowing Rock Town Council, the Concerned Citizens of Blowing Rock, and citizen comment, the study team decided after the July 31, 1996 Citizens Advisory Committee

meeting and the second Citizens Informational Workshop on August 1, 1996 to examine several new alternatives proposed by the Concerned Citizens of Blowing Rock, including a tunnel under the Blue Ridge Parkway. The Concerned Citizens of Blowing Rock provided maps showing its preferred bypass locations and design parameters. The study team met with representatives of this group prior to completing its designs to affirm that the designs met the group's expectations. The only expectation not met was tunnel length. The Citizens' Advisory Committee was given the opportunity to respond to a questionnaire that asked for comments on which bypass alternatives should be carried forward for detailed evaluation in the DEIS. Questionnaire results are discussed below in Section 7.3.3.

June 24, 1997 Citizens Advisory Committee Meeting

At this meeting, the fifth such meeting, the NCDOT presented four bypass alternatives that would be evaluated in detail and compared to the Widening Alternative in the DEIS. The NC Board of Transportation member for Division 11 was present and offered comments. A representative of the Federal Highway Administration (FHWA) regional office in Atlanta also attended to discuss Section 4(f) requirements. Committee members continued to express concern over community impact, particularly with the non-tunnel bypass alternatives. Questions and comments included:

- What was the anticipated schedule for completion of the DEIS;
- Cost should not be a factor in building a good highway;
- There is considerable concern that, if existing US 321 is widened, traffic will be diverted through downtown, which would be detrimental to businesses and the downtown character;
- Residents of Green Hill and along Green Hill Road do not support a bypass near or through that area;
- The reliability of the cost estimates; and
- Why were alternatives selected that closely paralleled the Blue Ridge Parkway (later dropped in early 1999) when, according to the questionnaire responses, only one person supported the concept.

The Blowing Town Council passed a resolution on October 20, 1997 saying that all five alternatives were "unacceptable in addressing the Town's transportation needs." They suggested no additional alternatives.

7.3.2 December 17, 1996 Interagency/Steering Committee Meeting

A second interagency/steering committee meeting was held on December 17, 1996. Agencies and organizations represented included:

- Town of Blowing Rock
- Watauga County
- Region D Council of Governments
- Concerned Citizens of Blowing Rock
- Blowing Rock Historical Society
- NC Alliance for Transportation Reform
- Appalachian State University

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- US Fish and Wildlife Service
 - Federal Highway Administration
 - Blue Ridge Parkway
 - NC Department of Cultural Resources (State Historic Preservation Officer)
 - NC Division of Water Quality
 - NC Wildlife Resources Commission

The primary purpose of this meeting was to present the additional citizen alternatives developed during the Citizens Advisory Committee meetings and a preliminary evaluation for all of the alternatives. After the meeting, a questionnaire was prepared to aid regulatory agency and local government representatives in identifying the bypass alternatives they thought should be evaluated in detail in the DEIS.

7.3.3 Alternatives Assessment Questionnaire

At the second interagency meeting, the original alternatives and the additional alternatives proposed by the Concerned Citizens of Blowing Rock were presented along with an assessment of each. A request was made that the assessment be restructured and mailed to members of the Interagency/Steering Committee Meeting. In response, a questionnaire was developed that presented the advantages and disadvantages of the alternatives and asked for preferences. Copies were sent to members of the Citizens Advisory Committee and representatives of various cultural and natural resource agencies. In the questionnaire, the potential bypass alternatives were divided into two geographic areas: south end alternatives and north end alternatives (see Section 2.2.2 of Chapter 2 under “Assessment of Potential Bypass Alternatives”). In each geographic area, advantages and disadvantages were described for each alternative. For each question, respondents were asked to answer “yes” or “no”, and give their reasons

Of the questionnaires distributed, 18 responses were received, ten from the Citizens’ Advisory Committee and eight from regulatory agencies. In general, the members of the Citizens’ Advisory Committee were opposed to the longer bypass alternatives extending south of Blackberry Road and to a northern terminus at Possum Hollow Road. Three of the Citizens’ Advisory Committee respondents were not in favor of a bypass at all. Of those who responded, the most support was for an alternative that started just north of Blackberry Road and passed under the Blue Ridge Parkway in a tunnel. There was no agency support for such an alternative that started south of the Blackberry Road or ended in a tunnel (although one respondent suggested that a tunnel be studied since it was the preferred alternative of the Concerned Citizens of Blowing Rock and the Blowing Rock Town Council.) Two of the agency respondents did not favor a bypass at all. Of those who selected alternatives to be studied further, most preferred those that followed a corridor that started just south of the Blowing Rock town limits and passed through the eastern part of Blowing Rock.

Responses to the questionnaires were used to help the study team select, in the fall of 1997, four Bypass Alternatives for comparison with the Widening Alternative in the DEIS. They were designated as Bypass Alternatives 1, 2, 3, and 4 and are described in Section 2.2.2 of Chapter 2 under “Alternatives Selected in 1997 for Detailed Evaluation in the DEIS.”

7.3.4 March 8, 1999 Video Presentation

A video presentation was prepared and presented on March 8, 1999 to various local officials and the Citizens Advisory Committee members. Members of the public also attended.

The video described the setting and history of the US 321 project and focused on the following topics:

- The results of NCDOT's 1998 origin and destination and geotechnical studies and
- The NCDOT's concerns about the four Bypass Alternatives selected in 1997, particularly taking into account the findings of the geotechnical studies;

The NCDOT suggested that all of the Bypass Alternatives be dropped from further consideration in favor of a widening alternative that included landscaping, underground utilities and other amenities. The NCDOT asked for comments on the presentation to be received by May 10, 1999. Nearly 200 comments were received. About half of the respondents favored the Widening Alternative as presented with landscaping and other amenities, while the other half favored Bypass Alternative 4.

After this meeting the NCDOT decided to evaluate the Widening Alternative, Bypass Alternative 1, and Bypass Alternative 4 in detail in the DEIS.

7.4 DEIS Preparation

During preparation of the DEIS, three NEPA/Section 404 team meetings were held. Additional meetings were held with cultural resource agencies and meetings with representatives of citizens groups.

7.4.1 NEPA/Section 404 Merger Team Meetings

NEPA/Section 404 merger meetings are held under an agreement between the NCDOT, the FHWA, and the USACE. These meetings are a formal means to involve early in the project development process the state and federal regulatory and environmental resource agencies that have an interest in the issuance of USACE dredge and fill permits for wetland and stream impacts under the terms of Section 404 of the Clean Water Act. Besides the NCDOT, FHWA (through concurrence point 2 only), and USACE, the state and federal agencies that comprised the Merger Team for this project are: the State Historic Preservation Officer (SHPO), the NC Division of Water Quality (DWQ), NC Wildlife Resource Commission (WRC), the US Environmental Protection Agency (EPA), the US Fish and Wildlife Service (USFWS), and the National Park Service (NPS).

The USACE must also meet the requirements of the National Environmental Policy Act (NEPA) in order to issue a dredge and fill permit. These meetings provide an opportunity for the participants to concur formally with key decisions in the EIS preparation process so that they do not need to be revisited during any application for a USACE permit. There are four primary concurrence points. Concurrence Points 1 and 2 occurred prior to the release of the DEIS, while Concurrence Points 2a, 3, and 4 occurred after the DEIS public and agency review process. At the date of the publication of this document, concurrence has been reached through Point 4a. The concurrence points are:

6. Concurrence on purpose and need;
7. Concurrence on the alternatives to be evaluated in the DEIS;

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- 2a. Concurrence on the location of bridges (as opposed to culverts) and their lengths;
 8. Concurrence on the Least Environmentally Damaging Practicable Alternative (LEDPA); and
 9. Concurrence that water resource impacts are avoided to the extent practicable and all planning possible has taken place to minimize impacts to water resources (includes sub-points 4a, 4b, and 4c).

The sections that follow describe three meetings that led to concurrence at the first two points. This Merger Team process was established by a Memorandum of Agreement in 1999 after the Widening Alternative, Bypass Alternative 1, and Bypass Alternative 4 were selected by the NCDOT earlier in the year. Therefore, Merger Team concurrence occurred later than the NCDOT's March 1999 decision to evaluate three alternatives in the DEIS. Concurrence Point 2a, 3 and 4a are addressed in Sections 7.10.1 and 7.10.2.

November 4, 1999 Meeting

The first NEPA/404 Merger Team meeting was held on November 4, 1999. Representatives from the following groups and agencies were in attendance:

- Blue Ridge Parkway;
- Federal Highway Administration;
- North Carolina Department of Transportation;
- North Carolina Division of Water Quality;
- North Carolina State Historic Preservation Officer;
- US Army Corps of Engineers; and
- US Environmental Protection Agency.

The objective of this meeting was to reach agreement on both the purpose and need statement and the alternatives to be evaluated in detail in the DEIS.

Participants agreed that transportation improvements are necessary along this section of US 321. Prior to reaching concurrence on the alternatives, the representative of the Division of Water Quality requested that a functional assessment of streams and wetlands for each of five alternatives (widening and all four 1997 bypass alternatives: 1, 2, 3, and 4) be provided. A decision on concurrence was postponed until the water resource information could be sent to the Merger Team members; the information was sent in February 2000.

December 14, 2000 Meeting

On December 14, 2000 a second merger meeting was held. Representatives from the following groups and agencies were in attendance:

- Blue Ridge Parkway;
- Federal Highway Administration;
- North Carolina Department of Transportation;
- North Carolina Division of Water Quality;
- North Carolina State Historic Preservation Officer;
- US Army Corps of Engineers;
- US Environmental Protection Agency (via telephone);
- US Fish and Wildlife Service; and
- North Carolina Wildlife Resources.

Again, the purpose of the meeting was to obtain agreement on purpose and need and alternatives to be evaluated in the DEIS. During the meeting, the study team again reviewed the project's Statement of Purpose and Need (Chapter 1 of the DEIS) with the team. The Merger Team participants signed an agreement concurring with the Statement of Purpose and Need (See Appendix F).

The study team also reviewed the characteristics of the three alternatives selected for evaluation in 1999, as well as the two selected in 1997 and dropped from further consideration in 1999. Several members of the Merger Team expressed the concern that their concurrence with the bypass alternatives would be an indication that they believed the alternatives were reasonable and feasible. Concurrence on the alternatives was not achieved.

January 18, 2001 Meeting

A third NEPA/404 Merger Team meeting was held on January 18, 2001. The same groups and agencies at the December Merger Team meeting were present with the exception of the Blue Ridge Parkway and North Carolina Wildlife Resources Commission. The purpose of the meeting was to reach consensus on alternatives to be evaluated in the DEIS. The majority of the Merger Team members indicated that they would not concur with Bypass Alternative 4. The NCDOT emphasized that this corridor was preferred by many citizens and that it was critical that it be evaluated in full in the DEIS. Consequently, the Merger Team signed a concurrence form that listed only the Widening Alternative and Bypass Alternative 1 as alternatives to be included in the DEIS. The language for the signed concurrence agreement indicated concurrence only on the Widening Alternative and Bypass Alternative 1. It was understood by the Merger Team, however, that the NCDOT would evaluate Bypass Alternative 4 in full in the DEIS. The NCDOT secured the signatures of Merger Team members not in attendance.

7.4.2 Cultural Resource Agency Meetings

In addition to participating in the interagency scoping and the NEPA/404 Merger Team meetings, representatives of the SHPO and the National Park Service (Blue Ridge Parkway) participated in additional meetings specific to cultural resource issues.

On February 27, 2000, a meeting was conducted with the representatives of the SHPO. Comments from SHPO representatives included:

- The SHPO is opposed to the widening of US 321 through the Green Park Historic District in Blowing Rock.
- Widening US 321 would increase noise and create a visual impact on the historic district. The construction process would impact the Green Park Inn through noise and disruption.
- There is a need for improvements to the current roadway and traffic situation. Building Bypass Alternative 4 would provide a four-lane bypass that would not negatively impact the Green Park Historic District.

On February 28, 2000, a meeting was held with representatives of the National Park Service (Blue Ridge Parkway). The following items were discussed during the meeting:

- The Blue Ridge Parkway is eligible for inclusion on the National Register of Historic Places. The Blue Ridge Parkway is a cultural resource.

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- The National Park Service has performed an in-depth scenic resource analysis for the Blue Ridge Parkway, including viewshed assessments.
 - Viewshed impacts must be evaluated beyond the right-of-way.
 - The view from the Thunderhill overlook is of primary importance to the National Park Service. The DEIS needs to perform a viewshed analysis for each design alternative in a comparative fashion.
 - Although the Linn Cove Viaduct (along the Blue Ridge Parkway near Grandfather Mountain) is very sensitive to the natural environment and considered a fine design, a Bypass Alternative 4 using a roadway structure would have to be evaluated on its particular merits and fit into the rugged Alternative 4 alignment landscape.

A field reconnaissance was conducted on August 22 and 23, 2000 with representatives of the FHWA, the SHPO, the NCDOT, the National Park Service (Blue Ridge Parkway), and the Advisory Council on Historic Preservation. The purpose of the field reconnaissance was to view and to discuss draft preliminary design plans and impact issues. The National Park Service also presented participants with its position paper, *Applicability of Section 4(f) – Constructive Use for the US 321 Bypass Project* (August 2000) and discussed it with participants.

7.4.3 Citizens Advisory Committee

In October 2000, members of the study team conducted informational meetings with representatives of most of the groups that are represented on the Citizens Advisory Committee. The meetings provided a project update and an opportunity for participants to ask questions regarding the project and its status. A representative of the Advisory Council on Historic Preservation attended some of the meetings.

7.5 General DEIS Outreach Programs

In addition to the activities already described, the NCDOT had several other programs to keep the public informed about the project and its status. These included newsletters, a toll-free project hotline, a web site, and small group meetings. The NCDOT maintained a mailing list of people who own property along the corridor and of other stakeholders interested in the US 321 project.

7.5.1 Newsletters

Between the summer of 1995 and the Summer of 2002, the NCDOT issued eight newsletters. The mailing list used to distribute the newsletters contains approximately 650 individuals and includes all property owners within 500 feet of the centerline of each of the proposed alternatives. These periodic newsletters have been available on the US 321 website (see Section 7.5.4) and provided an historical perspective on the development of the DEIS. Each of the issues provided contact information for people who had questions or comments on the proposed project or associated studies. In addition to being mailed to individuals and organizations on the project mailing list, the newsletters were also distributed at the Citizen Informational Workshops.

Summer 1995

The first newsletter was issued in August 1995. It provided information about the initiation of the EIS study and how it related to the EA released in 1993. The newsletter announced the August

1995 Citizens Informational Workshop and provided information on members of the Citizens Advisory Committee. It described what would take place during the alternatives analysis, part of the EIS study, and the social, economic, and environmental issues that would be examined during the later assessment of impacts. The newsletter also outlined the public involvement program.

Summer 1996

The second newsletter was issued prior to the Citizens Informational Workshop in August 1996. It presented the key findings of the bypass alternatives study, which was an evaluation of 10 potential bypass alternatives. The newsletter explained the criteria used in the selection of alternatives, traffic and engineering findings, and the potential for community, cultural resource, visual, and natural resource impacts. It also gave an update on the activities of the Citizens Advisory Committee. In addition to being mailed to individuals and organizations on the project mailing list, it was also distributed at the second workshop.

Fall 1997

The third newsletter identified the four Bypass Alternatives that were initially selected for detailed evaluation and comparison to the Widening Alternative in the DEIS. This issue also provided maps of the alternatives selected for evaluation.

Fall 1999

The Fall 1999 newsletter described the refinement of alternatives selection and detailed the three remaining alternatives to be evaluated in the DEIS. Maps of the alternatives and photo simulations of the Widening Alternative were included in the newsletter.

Fall 2000

The fifth newsletter provided an update on the status of the DEIS preparation and answered frequently asked questions. This issue also provided information on the US 321 study team members and their recent activities.

Spring 2001

This newsletter also provided an update on the DEIS activities, including fieldwork that had taken place since the last newsletter. It provided information on the change of status of what was an historic property affected by Bypass Alternatives 4A and 4B. In compliance with Section 106 of the National Historic Preservation Act of 1966, it also invited parties with an interest in the historic resources in the project area to consult on effects to historic properties. A description of the alternatives and detailed maps were also included in the newsletter.

Summer 2001

This newsletter provided more information on the roles and responsibilities of a Section 106 “consulting party” for historic resource effect assessment and mitigation. The newsletter renewed the invitation for people and groups to ask to be a consulting party.

Summer 2002

This newsletter was released with the DEIS. It announced the availability of the DEIS for review, Pre-Hearing Workshops and Public Hearing dates and times, a comparison of alternatives, and the due date for all comments.

7.5.2 Small Group Meetings

Each of the newsletters invited community groups and other stakeholders to arrange a small group meeting with the study team if they wanted to get additional information or provide comments on the project. Small group meetings were conducted with a variety of stakeholders, including the members of the following groups: Blowing Rock Country Club Board of Directors; Blowing Rock Historical Society; Concerned Citizens of Blowing Rock; Town of Blowing Rock; Green Hill Neighborhood Association; Blowing Rock Merchants Association; Blackberry Valley Citizens Group; and Appalachian State University. Small group meetings specific to historical resources were conducted in 2000.

The landscape architect and historic resource specialist from the US 321 study team visited Blowing Rock in early 2000 and met with several small groups of citizens and stakeholders. The meetings assisted in the development of context sensitive design treatments for the widening and revegetation plans for engineering designs in the Bypass Alternatives 1 and 4 corridors. Economists doing field studies also interacted with small groups when they surveyed local merchants along existing US 321, Realtors, and merchants along Main Street to assist in evaluating economic impacts.

7.5.3 Toll Free Project Information Line

A toll free information line was established for the US 321 Project. Calls received included requests to be placed on the mailing list, questions about the status of the project, and requests for information on how the alternatives might affect specific properties.

7.5.4 Website

The US 321 project website (<http://www.ncdot.org/projects/BlowingRock321/>) contained links to the following information:

- Copies of the project newsletters;
- US 321 project-related announcements;
- The March 1999 presentation;
- The 1997 *Bypass Alternatives Report*;
- The 1999 Purpose and Need Statement;
- Photo simulations of the project corridor;
- US 321 project schedule and history;
- Questions related to the project and their answers;
- The DEIS;
- Final Memorandum of Understanding with the Town of Blowing Rock on impact mitigation;
- Section 106 Memorandum of Agreement with the SHPO and the USACE on historic resource effect mitigation; and
- E-mail and information line contact information.

7.6 Pre-Hearing Workshops

Three pre-hearing open house workshops were held during the week prior to the Public Hearing to provide citizens an opportunity to learn more about the study; ask questions on an informal

basis; and provide comment. The workshops were conducted between the hours of 4:00 PM and 8:00 PM. Workshop locations were:

- August 19, 2002, at Chetola Resort and Conference Center on North Main Street in Blowing Rock;
- August 20, 2002, at Laurel Fork Baptist Church at 229 Jake Storie Road in the Aho Community north of the Blue Ridge Parkway; and
- August 22, 2002, at St. Marks Lutheran Church at 558 Blowing Rock Boulevard in the Blackberry Community south of Blowing Rock.

The NCDOT provided:

- Hearing maps;
- Photosimulations;
- Hard copies of the DEIS for review; and
- Graphics that described the environmental process through final design.

Compact discs (CD-ROM) containing the DEIS were distributed to the public. General questions and comments asked during the workshops included:

- When will construction begin;
- What will be the construction related impacts of any alternative chosen;
- When will right-of-way acquisition begin;
- What will be the impacts to the Green Park Inn Historic District; and
- The Widening Alternative will destroy the small town character of Blowing Rock;

7.7 Public Hearing

A formal Corridor Public Hearing was held on August 26, 2002 at the Blowing Rock Assembly Grounds from 7:00 PM to approximately 11:30 PM. The meeting opened with a presentation of the project given by Mr. Carl Goode of the NCDOT, then the floor was opened for comments. People had the opportunity to register to speak by signing up at the pre-hearing workshops, by calling or emailing Mr. Goode ahead of the Public Hearing, or by signing up on the night of the Public Hearing. After all registered speakers were heard, the floor was opened for additional comments. There were 53 speakers at the Public Hearing. Two hundred thirty-five written comment sheets or letters were received pertaining to the project at the hearing and over the course of the DEIS comment period, which extended from July 12, 2002 to September 26, 2002. The next section summarizes those comments and presents responses.

7.8 Public Comments and Responses

This section presents the comments on the DEIS from the public, interest groups, and businesses. These comments come from oral testimony, comment forms, and letters. The comments primarily included expressions of support or opposition to specific alternatives, expressions of opinion on the pros or cons of a particular alternative or alternatives, thoughts on the ability of alternatives to meet adequately future traffic need, and suggestions for additional alternatives.

The Widening Alternative received the most comments with 128 comments indicating support for the Widening Alternative either as the only solution, or as one possible solution from the alternatives assessed in the DEIS. There were 101 comments that expressed opposition to this alternative (either directly, or in conjunction with opposition to other alternatives). In addition, 23 comments expressed support for the No-Build Alternative either as the only solution, or as one possible solution. There were no comments that stated opposition to the No-Build Alternative.

Regarding the bypass alternatives, there were 104 comments expressing opposition to Bypass Alternatives 1A and 1B (either solely or in conjunction with opposition to another alternative). Forty comments supported these alternatives as a possible solution (no comments supported these alternatives as the only solution). There were also 102 comments expressing opposition to Bypass Alternatives 4A and 4B (either solely or in conjunction with opposition to another alternative). Bypass Alternatives 4A and 4B each had 51 comments in support of these alternatives as the only solution, or as one possible solution from the list of alternatives contained in the DEIS. Finally, 90 comments expressed opposition to all Bypass alternatives.

7.8.1 Comments Against Widening Alternative

One hundred one comments were received that expressed opposition to the Widening Alternative. Included in this total were 26 comments that solely expressed opposition to the Widening Alternative, and 75 comments that expressed opposition to the Widening Alternative along with opposition to and/or support of other alternatives (i.e., bypass, No-Build or TSM). Specific comments related to opposition to the Widening Alternative and responses are presented in the paragraphs that follow.

Community Impacts

Comment: Ninety-four comments addressed the community impacts of a Widening Alternative. Community impacts discussed in the comments included:

- The loss of the “feel” of Blowing Rock;
- The loss of property to road right-of-way;
- The division of the Blowing Rock community as a result of a larger road;
- Negative economic impacts to businesses along US 321 and the area as whole, both as a result of the widening and during the lengthy construction process; and
- The potential for the widening to cause further growth which could lead to even further widening in the future.

Several comments were also concerned that a wider US 321 through Blowing Rock would be an “ugly eyesore.” Many people felt that a wider road would also eliminate the “sense of peace” in the “haven of tranquility” that is the town of Blowing Rock.

Response: *Impacts the project is anticipated to have on the Blowing Rock community are addressed in this document in Section 4.1 of Chapter 4. The NCDOT conducted extensive mitigation discussions with the Town of Blowing Rock and residents of the Green Park Historic District to develop a plan to address community impact issues. The results of the discussion are contained in the project Memorandum of Understanding (MOA) and Memorandum of Agreement (MOA) included in Appendix G.*

Comment: A commenter observed that page 2-48 of the DEIS notes a condominium development not included in the impacts discussion in Chapter 4.

Response: The condominium development was never constructed. This reference was removed from FEIS.

Comment: One commenter observed that an update of the Blowing Rock Comprehensive Plan was to be completed in late 2002 or 2003.

Response: The revised plan is described in Section 3.1.5 of Chapter 3 of the FEIS.

Comment: The DEIS does not provide any information as to what day of the week and over which hours of the day the Origin and Destination study was conducted. We submit that a one-day study does not provide a sufficient benchmark to determine where most of the traffic is originating and heading. Furthermore, the destinations of drivers during the tourist season may substantially differ from those of drivers during the non-tourist season. Accordingly an Origin and Destination study should be done that considers seasonal fluctuations.

Response: The Origin and Destination study was done on Tuesday, September 22, 1998. Vehicles were stopped and surveyed from 6:00 a.m. until 6:00 p.m. that day. In the mountains region of North Carolina, the NCDOT typically assumes April or September to be representative of an average month, a time of year when school is in session and when the influence of seasonal factors is not great. The purpose of the Origin and Destination study was to collect information that could provide general guidance as to the mix of traffic in Blowing Rock. Information gathered from the study on through and local traffic was used to adjust the Travel Demand Model.

Comment: A commenter observed that there is a substantial disparity between the level of traffic in the tourist season and in the off-season.

Response: Traffic volumes can vary substantially between tourist season and off-season. NCDOT accounts for this variance when calculating the Average Annual Daily Traffic (AADT) volumes it publishes each year. Traffic counts are taken electronically for short periods of time at many locations in the state. In addition, traffic count information is collected from permanent traffic count stations that record continuously throughout the year. Together, this information is used to determine the AADT and account for seasonal differences.

Traffic Forecasts and Level of Service

Comment: A commenter said the traffic data and estimates in the DEIS are both misleading because of the paucity of data provided in the DEIS and the outdated nature of that data.

Response: The information provided in the DEIS and the FEIS accurately reflects the findings of the NCDOT's traffic studies that were developed and used in the decision-making process. Traffic forecasts are based on both the starting point of an existing traffic count and long-term forecast population and economic development growth. Population forecasts for Watauga County indicate that the area will continue to grow. There is no expectation of a decline in growth that would eliminate the need for improving the existing road. In some locations in the project area, US 321 is already inadequate to carry peak travel demands.

Comment: A commenter said that level of service being a qualitative rather than quantitative factor depends on the observer. In the commenter's observations, based on daily use of US 321, the level of service on US 321 differs from that presented in the DEIS.

Response: *Level of service is a quantitative measure in that it reflects the ratio of peak period traffic volumes to the capacity of the road and/or delay, both of which are quantities. Levels of service are determined based on the mathematical model contained in the 2000 Highway Capacity Manual. The alternatives were assessed from the perspective of expected 2025 traffic conditions, which will differ from those that can be observed today since traffic volumes are forecast to be higher.*

Comment: A commenter said the NCDOT appears to have been changing the traffic volume data according to what NCDOT is trying to show at any given point in time.

Response: *Traffic data in NCDOT environmental documents is based on objective analyses. As a project progresses, it is updated as needed for sound decision-making.*

Road Safety Loss

Comment: Potential road safety loss resulting from the Widening Alternative was mentioned in 27 comments. These comments often expressed the concern that a wider road would mean increased traffic speeds and therefore a greater potential for crashes. Many comments stated that the current US 321 has a comparably low crash rate to other roads of similar natures, and that widening would only mean an increase in crashes and their severity. In addition, one comment raises the concern that widening would result in an increase in insurance rates for residents in Blowing Rock because of the potential increase in danger on US 321.

Response: *As discussed in Section 1.5.7 in Chapter 1, crash rates on US 321 in the project area are higher than average crash rates on similar roads in North Carolina. The Widening (Preferred) Alternative will be designed in accordance with NCDOT design standards for four lane rural roads south of town and four lane urban roads within the Town of Blowing Rock. NCDOT standards are based on standards used nationwide for designing safe roads of all types. Flatter curves, better sight distances, turn lanes, and the opportunity to pass slow-moving trucks are all aspects of the Preferred Alternative that can improve the safety of US 321. Current posted speed limits will not be changed. Enforcement of speed limits is a local responsibility.*

Comment: A commenter said that the crash rate for the Widening Alternative is greater than for the existing highway and much greater than for a true-bypass. Crashes will increase because access is not controlled.

Response: *Statewide average crash rates are lower on roads that do not have frequent driveways and cross streets, such as the Bypass Alternatives. The Widening Alternative design, however, would include geometric improvements that would address many of the geometric conditions on US 321 that contribute to its current high crash rate.*

Comment: A commenter asked what roads were used in calculating statewide accident rates for similar roads. Interest also was expressed in regional crash rates.

Response: *Statewide average rates prepared by the NCDOT took into account all rural (2,664 system miles) and all urban (494 system miles) two-lane undivided US routes in North Carolina. This is standard NCDOT practice because statewide rates are*

statistically more relevant than regional rates since they represent a larger sample (more miles). The NCDOT has recently started calculating Division rates. These rates are not generally used by the NCDOT to evaluate crash rates on roads and therefore are not reported in Chapter 1 of this FEIS. However, rates for Division 11, the northwest part of the state that includes Blowing Rock, are provided here in response to the comment. The table that follows presents crash rates for two-lane undivided US routes in NCDOT's Division 11. US 321 rates also are worse than Division 11 rates.

Rate	US 321 Rate	Divison 11 Rate ¹	Statewide Rate ²	Critical Rate ³
Rural Section South - SR 1500 (Blackberry Road) to Blowing Rock Town Limits				
TOTAL	310.63	187.97	170.47	231.07
Fatal ⁴	7.06	2.49	2.12	12.01
Non-Fatal Injury	91.78	79.91	74.31	115.62
Night	105.90	47.08	50.49	85.08
Wet	42.36	30.97	30.42	58.06
Urban Section - Town Limits (south) to Town Limits (north of Possum Hollow Road)				
TOTAL	407.70	244.46	321.84	382.23
Fatal ⁵	0.00	0.43	0.98	6.16
Noon-Fatal Injury	105.84	78.07	117.08	154.28
Night	98.00	35.72	62.62	90.35
Wet	109.76	44.91	53.87	79.74

Note: Rates based upon 100 million vehicle-mile exposure.

¹ Division 11 average rates prepared by the NCDOT for all rural and urban two-lane undivided US routes in Division 11 for 2000-2002.

² Statewide average rates prepared by the NCDOT for all rural and urban two-lane undivided US routes for 2000-2002.

³ Based on the statewide crash rate (95 percent level of confidence).

⁴ Fatal crash rates are not statistically significant because of the small frequency of these types of crashes.

Through Traffic will not be Provided a Bypass

Comment: Fifty-nine comments indicated that through traffic on US 321 would still have to pass through Blowing Rock with the Widening Alternative. These comments frequently mentioned that 85 percent or more of the traffic using US 321 in Blowing Rock is through traffic.

Response: *Through traffic is defined as traffic that neither originates nor is destined for a location within the Town of Blowing Rock. A four lane US 321 will have the capacity to carry both through and local traffic. The percent of through traffic varies along US 321 depending on how much local traffic is using the road at any given location. For example, the September 1998 origin and destination study conducted by the NCDOT found that the percent through traffic is approximately 78 percent near Blackberry Road, south of the Town of Blowing Rock. Between Sunset Drive and the Food Lion in Blowing Rock, the traffic is approximately 48 percent through traffic. In addition, 88 percent of the through traffic has origins or destinations in the region (Caldwell and Watauga*

counties and the adjoining counties). Seventy-three percent of the through trips are people traveling between home and work.

Other Potential Traffic Impacts

Comment: Other potential traffic impacts of widening US 321 were discussed in 40 comments. Traffic impacts mentioned included increased traffic and congestion, increased noise levels because of more traffic at higher speeds, and increased pollution levels. Several comments discussed the fear that increased pollution levels may cause undue health problems for the residents of Blowing Rock, particularly children and the elderly.

Response: *The Widening (Preferred) Alternative is not being proposed as a new route for through traffic. It is being proposed to serve the traffic flow and safety needs of a forecast increasing population, through trips, and tourist traffic in Blowing Rock and the surrounding region. Widening the highway would provide one additional through lane in each direction, thereby reducing congestion through the Town of Blowing Rock. Turn lanes also will be added at key intersections. This will sufficiently serve expected travel demand volumes through 2025. The Preferred Alternative would cause noise impacts at 28 noise sensitive receptors, which is an increase of nine over the No-Build Alternative. However, the noise impacts caused by Bypass Alternatives 4A/4B would be similar to the Preferred Alternative (25 impacts by Alternative 4A and 24 impacts by Alternative 4B), while the noise impacts caused by Bypass Alternatives 1A/1B would be much greater (69 impacts by Alternative 1A and 61 impacts by Alternative 1B). Finally, Watauga and Caldwell Counties are currently in compliance with the National Ambient Air Quality Standards (NAAQS) for all criteria pollutants, and the Preferred Alternative is not predicted to cause or exacerbate a violation of the NAAQS.*

Historic Resources Impacts

Comment: Historic resource impacts of widening US 321 were discussed in 14 comments. Most concerns about the historic resource impact of the Widening Alternative focused on the effect on the Green Park Inn and its property. The potential for property loss on several other sites not classified as historic was also mentioned.

Response: *The Widening (Preferred) Alternative will have an adverse effect on the Green Park Historic District and the Green Park Inn. Both are listed on the National Register of Historic Places. The NCDOT, the State Historic Preservation Officer (SHPO), and the USACE, developed a Section 106 Memorandum of Agreement for mitigating these effects. Development of the agreement also considered input from other Consulting Parties, including the Town of Blowing Rock. The MOA is included in Appendix G, and it provides the names of all Section 106 MOA Consulting Parties invited to concur and who concurred with the NCDOT's, SHPO's, and USACE's agreement.*

Construction Impacts

Comment: Nineteen comments were concerned with potential construction impacts of the Widening Alternative. These comments discussed the fear that construction on US 321 could negatively affect the town's economy, in particular its tourism industry. Many of these comments also discussed the concern that construction may detract from the town's appearance, as well as exaggerate congestion and discourage potential customers from coming to the downtown shopping area. In addition, there was the concern that construction may take longer than planned, resulting in extended periods of slow business for the town's shopkeepers who often struggle financially even in a busy tourist season.

Response: *The DEIS (Sections 2.4.1 and 4.17) and the FEIS (Sections 2.4.1 and 4.16) discuss approaches to construction and reducing construction impacts. Specific commitments related to mitigation during the construction of the Widening (Preferred) Alternative are presented in the Memorandum of Agreement with the SHPO and the USACE and the Memorandum of Understanding with the Town of Blowing Rock included in Appendix G.*

Other Alternatives

Comment: Five comments expressed support for prohibiting trucks on US 321 through Blowing Rock in conjunction with opposition to the Widening Alternative. These comments were in support of either the No-Build Alternative or providing a bypass outside of the local area (e.g., between Lenoir and US 421), and suggested that restricting trucks to US 421 would reduce the need for widening US 321.

Response: *Even with truck prohibitions on US 321 through Blowing Rock, much of existing US 321 through Blowing Rock would still need to be widened before 2025 in order to serve local traffic growth. In addition, it is not practical to make truck traffic travel the substantially greater distances that would be required by prohibiting them from using US 321 through Blowing Rock. For example, the distance from Hickory to Boone via US 321 is 48 miles, whereas the distance from Hickory to Boone via US 321, NC 18, and US 421 is 80 miles, an increase of 67 percent. The Widening (Preferred) Alternative also would potentially help reduce crashes and increase safety for all motorists along existing US 321 by providing gentler curves and wider lanes.*

Comment: A commenter said the DEIS fails to discuss a less expensive option of constructing a third lane between Blackberry Road and Green Hill Road to permit passing of slow moving trucks bringing peak hour level of service on this segment to an acceptable level.

Response: *The merits of two- and three-lane alternatives are discussed in the DEIS in Section 2.3.6 of Chapter 2. They also are discussed in the same section of the FEIS. Because of the interest in a three-lane alternative at the public hearing, the NCDOT reevaluated a three-lane alternative through the Green Park Historic District, as well as a three-lane alternative that continued north to Sunset Drive. The results are also reported in Section 2.3.6. The conclusion is that a third lane would not achieve an adequate level of traffic service.*

Comment: More information is needed on the analysis of the redesignation of the US 321 alternative.

Response: *Additional information on this analysis was included the 1993 Environmental Assessment of US 321 Improvements between NC 268 and US 221 in Blowing Rock. This additional information is included in Section 2.3.3 in Chapter 2 of the FEIS.*

Design Characteristics and Assumptions

Comment: A commenter said that geotechnical studies were inadequate for the comparison of alternatives.

Response: *The geologic map prepared by the NCDOT was used to establish the assumptions of slope steepness used in developing the designs assessed in the DEIS and the FEIS. Experience on other road projects and road maintenance also is used for this decision. Additional information could be gathered only by conducting a drilling and*

core sampling program, which is not done until final design. The NCDOT has no expectation that a drilling program would reveal that cut and fill slopes could be made substantially steeper and thereby substantially change the characteristics or preliminary costs of the various alternatives.

Comment: A commenter noted that design criteria exceptions exist with the Widening Alternative and said that the DEIS fails to prove that the costs saved by design exceptions to horizontal and vertical curve criteria are worth the risk to the driving public.

***Response:** Decisions on design exceptions in the Preferred Alternative were made based on the experience and judgment of the design team. Design exceptions only mean that drivers will need to lower their speed when passing through areas of sharp curves. Adequate site distance before the start of sharp curves and warning signs are used to alert motorists to changes in driving conditions.*

Comment: A commenter observed that improvements at the US 321/Goforth Road intersection will require a steep grade.

***Response:** The US 321/Goforth Road intersection will be closed. See the Memorandum of Understanding in Appendix G.*

Comment: A commenter said that US 321 at the Norwood and Country Club Drive intersections will require a turn lane.

***Response:** Four lanes will provide adequate capacity for the forecast traffic volumes. A turning lane and thus a wider road would be needed to provide a left turn lane at both intersections, thereby increasing impacts to adjacent properties. The US 321 intersection is the only way to reach Country Club Drive destinations. A left turn lane can be provided at the one intersection without increasing impact and is now included in the Preferred Alternative.*

Relation to Highway Trust Fund Objectives

Comment: A commenter said the motivation for this project is Section 136-178 of the NC Highway Trust Fund Act of 1989, which established the intrastate highway system to provide “high-speed, safe travel service...to support statewide growth and development objectives.” The proposed “widening alternative” fails in each of these tests.

***Response:** The comment refers to the purpose for the intrastate system established by the Highway Trust Fund Act. The act does not mandate specific design characteristics on any given segment of the intrastate system. The NCDOT plans, designs, and constructs Trust Fund-related improvements within the constraints of the characteristics of the built and natural environment, costs, and the specific travel needs of the area.*

7.8.2 Comments in Support of Widening Alternative

One hundred twenty-eight comments were received that expressed support for the Widening Alternative. Included in this total were 74 comments that expressed opposition to either a specific bypass alternative or any bypass in general. Also included in this total were five comments that expressed support first for the No-Build Alternative, but also expressed support for the Widening Alternative if the No-Build Alternative was not feasible. Specific comments related to support for the Widening Alternative and responses are presented in the paragraphs that follow.

Meets Project Purpose & Need

Comment: Twenty-six comments said the Widening Alternative would meet the project Purpose and Need of alleviating traffic congestion and improving road safety. In addition, many comments argued that even with a bypass, continued growth and development within Blowing Rock, such as the proposed Performing Arts Center, would mean that continued improvements (e.g., widening and turning lanes) would still be needed on existing US 321.

Response: *The Widening (Preferred) Alternative will meet the project's Purpose and Need (see Chapter 1). The Preferred Alternative would improve traffic operations along the entire length of US 321 to level of service (LOS) D or better through 2025. The project also would achieve the desired peak hour LOS C along the roadway at all locations except between US 221 and Shoppes on the Parkway, where an acceptable LOS D would occur. (See Table 2-13 and Table 2-14 in Chapter 2 of the FEIS.) The Preferred Alternative also would help reduce crashes and increase safety along existing US 321 through more gentle curves and wider lanes. In addition, even with the construction of a bypass, much of existing US 321 through Blowing Rock would need to be widened before 2025 in order to serve local traffic growth.*

Improve Tourism

Comment: Nine comments discussed the potential for the Widening Alternative to improve the tourism industry in Blowing Rock. These comments generally indicated that because a widened US 321 would provide easier access to Blowing Rock for motorists, more tourists, visitors, and other potential customers may actually be drawn into town rather than avoiding it.

Response: *Economic impacts of the Widening (Preferred) Alternative are discussed in Section 4.1.2 in Chapter 4 of the DEIS and the FEIS. The Preferred Alternative will meet the project's Purpose and Need of improving traffic operations along the entire length of US 321 to LOS D or better through 2025. The project would also achieve the desired peak hour LOS C along the roadway at all locations except between US 221 and Shoppes on the Parkway, where an acceptable LOS D would occur. (See Table 2-13 and Table 2-14 in Chapter 2 of the FEIS.) The improved traffic operations and reduced congestion on US 321 will provide un-congested access to Blowing Rock, thereby benefiting tourists and other visitors. In addition, the NCDOT worked with the Town to help maintain Blowing Rock's village atmosphere and small town appeal through providing extensive landscaping, pedestrian accommodations, and other appropriate features that may support the Town's tourism industry (see Appendix G).*

Beautify Blowing Rock

Comment: Twenty-four comments indicated that the Widening Alternative would beautify Blowing Rock. Most of these comments indicated that the Widening Alternative as discussed in the DEIS (e.g., landscape and median improvements) would be an improvement on the current appearance of the road and provide a needed face-lift for the town. One comment addressed the potential to make gateways at both ends of US 321 to welcome visitors into Blowing Rock. However, there were also several comments that expressed preference for providing a two-way center-turn-lane rather than a landscaped median on the widened section of US 321 through Blowing Rock (so that motorists would have easier access to business driveways rather than having to make u-turns in some locations in order to reach businesses on the opposite side of the road).

Response: *Impacts on visual and aesthetic quality by the Widening (Preferred) Alternative are discussed in Section 4.3.2 of the DEIS and the FEIS. The village*

atmosphere of Blowing Rock is recognized as important and has influenced planning and design decisions presented in the DEIS and FEIS. During the preparation of the FEIS, the NCDOT worked with the Town of Blowing Rock and stakeholders from the Green Park Historic District to develop a plan to mitigate potential impacts on Blowing Rock's appearance through design features, landscaping, and construction techniques as a part of the Preferred Alternative. These efforts are illustrated by the MOU between NCDOT and the Town of Blowing Rock and the MOA between the USACE, NCDOT, and the SHPO (Appendix G). For example, in response to conversations with advocates of the Green Park Historic District, the NCDOT agreed to remove a median in front of the Green Park Inn proposed in the DEIS and reduce the lane width from 12 to 11 feet through the Green Park Historic District. As project planning and design moves forward, the NCDOT will continue to solicit the Town's continued input. The NCDOT will provide a set of preliminary right of way plans to the Town of Blowing Rock for their review and comment at the 25, 50, and 80 percent completion stage of the project's final design. A two-way left turn lane is not proposed because, in addition to adding landscaping, a median-divided facility that controls where left-turns can be made decreases the potential for crashes.

7.8.3 Comments in Support of a Bypass

Although no comments were received that specifically supported Bypass Alternatives 1A and 1B, 40 comments were received that supported a bypass in general, including Bypass Alternatives 1A and 1B. Fifty-one comments were received that supported Bypass Alternatives 4A either specifically, or in conjunction with support for other bypass alternatives and opposition to the Widening Alternative. Included in this total were 11 comments that specifically supported Bypass Alternative 4A. In addition, 51 comments also were received that supported Bypass Alternative 4B either specifically, or in conjunction with support for other bypass alternatives and opposition to the Widening Alternative. Included in this total were 11 comments that specifically supported Bypass Alternative 4B. Specific comments related to support for the Bypass Alternative and responses are presented in the paragraphs that follow.

Bypass will Re-route Through Traffic

Comment: Thirty-two comments said a bypass would reroute through traffic that did not have origins or destinations in Blowing Rock. These people felt that a bypass would meet the Purpose and Need of the project by rerouting through traffic around Blowing Rock and thereby alleviating congestion within Blowing Rock.

Response: *The bypass alternatives would attract through traffic, but not enough to eliminate the need to improve existing US 321. (See Table 2-13 and Table 2-14 in Chapter 2 of the FEIS.) Furthermore, the bypass alternatives are substantially more expensive to construct than the Preferred Alternative, and they would cause greater impacts to the natural environment. Finally, the bypass alternatives would also cause substantial impacts to neighborhoods, homes, and property in eastern Blowing Rock (Alternatives 1A/1B), or homes, farms, and property in the rural areas to the east of Blowing Rock (Alternatives 4A/4B).*

A Bypass Would be Good for Blowing Rock Economy

Comment: Four comments said a bypass could be good for Blowing Rock's economy. These comments stated that eliminating congestion may create a more favorable economic climate in Blowing Rock for tourists. The bypass would eliminate congestion within Blowing Rock and allow for true visitors – not just the truck traffic passing through – to travel unhindered.

Response: *Economic Impacts associated with the bypass alternatives are discussed in Section 4.1.2 of Chapter 4 in the DEIS and the FEIS. The Widening (Preferred) Alternative would meet the project's Purpose and Need of improving traffic operations along the entire length of US 321 to LOS D or better through 2025. The project would also achieve the desired peak hour LOS C along the roadway at all locations except between US 221 and Shoppes on the Parkway, where an acceptable LOS D would occur. The improved traffic operations and reduced congestion on US 321 will provide easier access to Blowing Rock, thereby benefiting tourists and other visitors. A bypass would not necessarily eliminate the need to widen US 321; it also would incur substantial more expense to construct than the Preferred Alternative; and it would cause greater impacts to the natural and human environments (see preceding response).*

Meets Future Bypass Need

Comment: Twenty-five comments said a bypass is needed to meet future traffic need beyond 2025. These comments argued that a bypass should be built now because it will be needed in the future anyway, and building it now would save time and money.

Response: *The Widening (Preferred) Alternative will serve expected travel demand for the reasonably foreseeable future. This conclusion is based on traffic forecasts for 2025 (see Table 2-12, Table 2-13 and Table 2-14 in Chapter 2 of the FEIS.). This time horizon is used to plan highway improvements statewide. Forecasts of traffic beyond such a horizon are not considered reasonable for cost-effective highway planning. Local traffic is growing, too. Thus, the opposite argument also could be made, that if one builds a bypass that ultimately the widening would be needed anyway.*

Attractive Feature

Comment: Twelve comments discussed the potential for a bypass to become an attractive feature in the Blowing Rock area. These comments often cited the Linn Cove Viaduct as an example of what the Blowing Rock Bypass could become. They also stated that a bypass would provide tourists with even more stunning vistas, similar to those of the Blue Ridge Parkway, which might even attract more business for the Blowing Rock economy.

Response: *Bypass Alternative 4B reflects the concept advocated in this comment. As discussed in Section 4.3.6 in Chapter 4 of the DEIS and FEIS, substantial visual and aesthetic impacts would still occur, including substantial change in an important viewshed of the Blue Ridge Parkway*

Provide a Connection between Lenoir and US 421

Comment: Nineteen comments expressed support for providing a connection between Lenoir and US 421 (in the less mountainous terrain north of Lenoir) in order to avoid either having to widen US 321 or building a new road in the more mountainous terrain near Blowing Rock. One of these comments also suggested redesignating the new route as US 321.

Response: *This approach is not a reasonable alternative to improving US 321 because the travel distance between Hickory and Boone is substantially greater on a route that includes US 421 instead of US 321. For example, the distance from Hickory to Boone via US 321 is 48 miles. The distance from Hickory to Boone via US 321, NC 18, and US 421 is 80 miles, an increase of 67 percent. Therefore, it is unlikely that a substantial number of through travelers would choose to use an alternate route of so much greater length. See Section 2.3.4 of Chapter 2 for a discussion of this option.*

Comment: A commenter indicated the study team refused to analyze a bypass alternative developed by the Concerned Citizens of Blowing Rock.

***Response:** As indicated on page 2-13, the study team considered the location criteria particularly important to the Concerned Citizens of Blowing Rock in developing bypass alternatives. The alternatives developed using that criteria are shown in Figure 2-5 in Chapter 2 and are labeled with the suffix “CC.” These alternatives also took into consideration bypass alignments suggested by the Concerned Citizens of Blowing Rock within the context of meetings of the Citizens Advisory Committee, which met during the development and evaluation of alternatives. The alternatives developed by the study team, however, did not exactly match those proposed by the Concerned Citizens because the study team’s alternatives reflect an engineered horizontal and vertical design.*

7.8.4 Comments Against a Bypass

One-hundred sixteen comments were received in opposition to a bypass. Included in this total were: 102 comments that included opposition to Bypass Alternatives 4A/4B; 104 comments that included opposition to Bypass Alternatives 1A/1B; and 90 comments that included opposition to all bypasses in general. Specific comments related to support for the Bypass Alternative and responses are presented in the paragraphs that follow.

Natural Resources Impacts

Comment: Ninety-one comments expressed concern about the natural resources impacts of a bypass. The impacts discussed in these comments included: loss of forest and farmland to the bypass; potential damage to streams contained in the Yadkin River watershed; potential harm to the forest ecosystem as a result of fragmentation; potential sterilization of streams as a result of erosion and sedimentation; and damage to the environment as a result of the cut and fill activity that would be needed to build a bypass, including blasting away the sides of mountains for rock cuts and to construct a tunnel. Two comments also mentioned the possible presence of the endangered flower “Heller’s Blazing Star” in the region.

***Response:** Natural Resource impacts associated with the bypass alternatives are presented in Section 4.10 in Chapter 4 of the DEIS and Section 4.9 in Chapter 4 of the FEIS. A survey for Heller’s Blazing Star was conducted following the Public Hearing (see Section 4.9.4 of Chapter 4). No evidence of the plant was found in the area affected by the Widening (Preferred) Alternative.*

Cost

Comment: Seventy-eight comments mentioned concern for the substantial monetary cost of a bypass alternative. These comments focused on the concern that the cost to construct a bypass is exorbitant, particularly in the current economic atmosphere in North Carolina. As a result, many believed that widening would be a more cost-effective alternative. However, some comments believed that the NCDOT intentionally designed the bypass alternatives to be exorbitantly expensive to build so that the bypass alternatives would appear less favorable in comparison to the Preferred Alternative.

***Response:** As indicated in Section 2.4 in Chapter 2 of the DEIS and FEIS, Bypass Alternative 1A is expected to cost \$75.1 million and Bypass Alternative 1B is expected to cost as much as \$92.2(including right-of-way and construction). Bypass Alternative 4A is expected to cost \$170.5 million and Bypass Alternative 4B is expected to cost \$250.3 million (including right-of-way and construction). In comparison, the projected cost for*

the Widening (Preferred) Alternative is \$45.9 million, which is as much as 80 percent less than the other alternatives studied. The preparation of construction cost estimates was based on preliminary design plans and unit costs maintained and updated on a continuing basis by the NCDOT. Right-of-way costs were developed by the NCDOT's Area Right of Way Appraisal Office, which is responsible for all right-of-way appraisals in Division 11. The costs were developed as precisely as possible based on information currently available.

Community Impact

Comment: Fifty-four comments discussed the potential community impacts of a bypass. These impacts included: the destruction of neighborhoods, homes, and property in eastern Blowing Rock; the destruction of homes, farms, and property in the rural areas to the east of Blowing Rock; the destruction of a family cemetery that is currently in a bypass corridor; and the relocation of a recently constructed power station. These comments also indicated that many of the homes and farms that may be affected have been the residences of the same family for several generations.

Response: *Community impacts, including the relocations, effects on neighborhoods and community cohesion, and effects on community facilities and resources are discussed in Section 4.1 in Chapter 4 of the DEIS and the FEIS.*

Visual Impact

Comment: Twenty-nine comments mentioned a concern for the potential visual impact of a bypass alternative. The main concern discussed was that Bypass Alternatives 4A and 4B would be directly visible from the Blue Ridge Parkway, thereby changing the view from several overlooks.

Response: *Impacts to visual and aesthetic quality of the bypass alternatives are discussed in Sections 4.3.3 to 4.3.6 in Chapter 4 of the DEIS and FEIS. Discussions of impacts to Blue Ridge Parkway views are included in these discussions.*

Economic Impact

Comment: Fourteen comments discussed the potential economic impacts of a bypass alternative. These comments focused on the effect a bypass might have upon the economy of Blowing Rock, particularly its tourist industry, if a bypass were to draw potential visitors away from the town.

Response: *Economic impacts of the bypass alternatives are discussed in Section 4.1.2 in Chapter 4 of the DEIS and the FEIS.*

Other

Comment: Thirteen comments had concerns about a bypass alternative that did not fall under any particular category listed above, including the following:

- None of the bypass alternatives provided by the NCDOT is a “true” bypass because a true bypass would cost less and have less dramatic visual and natural resources impacts.

Response: *Bypass Alternative 4 fully bypasses the Town of Blowing Rock. Because of the steep terrain south and west of Blowing Rock, it is not possible to design a bypass of Blowing Rock that is not substantially more expensive and damaging to the natural environment than widening the existing roadway. Bypass Alternative 4B, attempted to*

reduce the visual impacts of a bypass in the Bypass Alternative 4 corridor, but in doing so incurred an increased cost. This illustrates that cost and impacts are often inversely related (as one decreases, the other increases).

- Blowing Rock already has a bypass (the current US 321), which simply needs to be improved. In addition, a new bypass would not divert a substantial amount of traffic because many people enjoy driving through Blowing Rock despite the congestion. Finally, a new bypass would not address the traffic generated by day fairs, festivals, and the proposed Performing Arts Center.

Response: The Widening Alternative is recommended as the Preferred Alternative.

7.8.5 Comments in Support of No-Build Alternative

Twenty-three comments expressed support for the No-Build Alternative. Included in this total were 13 comments that supported only for the No-Build Alternative and eight comments that expressed support for the Widening Alternative if the No-Build Alternative was not feasible. There were no comments that stated direct opposition to the No-Build Alternative.

Response: The No-Build Alternative would not meet the proposed project's purpose and need of improving traffic flow and level-of-service, as well as reducing the potential for crashes. With the No-Build Alternative, existing road features, including sharp curves and poor sight distance, that contribute to crashes on US 321 would remain unchanged. In addition, traffic congestion on US 321 would continue to grow, and the quality of service that the highway provides to motorists would continue to deteriorate. This was not considered an acceptable approach given these factors and that US 321 serves as an important regional travel corridor.

7.8.6 Potential Greater Influence of Bypass Supporters

Comment: Many of the comments expressed concern about the division of opinion over the proposed project in Blowing Rock. Many comments in opposition to the bypass alternatives stated that bypass supporters represented only a minority of the citizens of Blowing Rock, but these individuals are vocal and powerful enough to misrepresent information about the project in order to manipulate the townspeople of Blowing Rock and the NCDOT into supporting their alternative. These commenters asked that the NCDOT not pay bypass supporters a biased amount of attention, particularly since they felt many bypass supporters are only part-time residents of Blowing Rock.

Response: The NCDOT used all information currently available, including giving equal and unbiased consideration to all public and agency comments received, in arriving at the recommendation to select the Widening Alternative as the Preferred Alternative.

7.8.7 Other Traffic-Related Comments Received After the Public Comment Period Ended

Comment: The 2025 peak hour volumes (DEIS Table 1-1 on page 1-8) were calculated based on an assumption that 14 percent of the Average Daily Traffic will occur in the peak hour. This percentage is not supported by text in the report. How was it determined?

Response: The American Association of State Highway and Transportation Officials (AASHTO) recommends the use of the 30th highest hourly volume of the year as the design

hourly volume. AASHTO guidebook (2004) Exhibit 2-28 illustrates that 14 percent of ADT is within the acceptable range. As a seasonal tourist area Blowing Rock is not subject to the standard AM and PM peaking characteristics of other locations. The less conservative 14 percent was considered a reasonable choice for this area. The study team reviewed the Automatic Traffic Recorder traffic data in this area and found that the peak hour volume selected corresponds to the 109th highest hour.

Comment: How did the NCDOT determine that the TSM option was not feasible given that intersections determine capacity along arterial roadways, yet there is no intersection traffic data or detailed analysis to fully evaluate the TSM option?

Response: *The statement made above—“intersections determine capacity along arterial roadways”—is a generalization of highway capacity analysis methodology and not reflective of the full US 321 project area corridor. This comment is more suited for downtown streets in an urbanized area where many intersections are signalized and turning movements represent a substantial percent of total traffic.*

The US 321 project area corridor in Blowing Rock is a two-lane rural highway that meanders through a mountainous terrain with high volumes of truck, recreational, and through traffic. It is a NCDOT-designated principal arterial and its primary function is to provide regional mobility. The capacity of this corridor is determined by a complex set of geometric and traffic factors, including the number and width of lanes, posted speed, number of driveways, median type, percent trucks, and terrain.

The traffic study conducted for the US 321 DEIS analyzed the US 321 corridor comprehensively in terms of nine roadway segments and seven intersections. The results are documented for Existing, No-Build, Widening, Bypass Alternative 1, and Bypass Alternative 4 scenarios (see Table 2-11 and Table 2-12 in the DEIS and Table 2-12 and Table 2-13 in this FEIS).

The capacity analysis for the TSM alternatives was handled on a case-by-case basis (i.e., improved two-lane and improved three-lane configurations) because they required additional considerations, segment definitions, and hybrid methodologies. This TSM capacity analysis methodology is documented in the DEIS (Section 2.3.5) and the FEIS (Section 2.3.6). The analysis results showed that the TSM alternatives fail to adequately handle the projected 2025 hourly traffic volumes, including the typical weekday peak hour volume (see DEIS Figure 2-10 through Figure 2-12 and FEIS Figure 2-11 through Figure 2-13), at mid-block locations. The typical weekday peak hour volume was considered a minimum reasonable design benchmark for the project area corridor based on the project’s purpose and need and the even greater peak hour volumes associated with summer peaking characteristics. The TSM alternatives were deemed inadequate when they failed to meet even this minimal benchmark. The fact that these alternatives can not meet this minimal benchmark at the mid-block locations eliminates the need to examine the controlling intersections, because they would drive level of service even lower.

Comment: Without detailed traffic information, it is very difficult to determine whether operational improvements are sufficient in the TSM alternative. Would the state be willing to collect more detailed intersection traffic data and conduct the level of analysis needed to put the question about the feasibility of TSM strategies to rest?

Response: *Since DEIS publication, the NCDOT revisited the TSM alternatives and conducted further detailed traffic operational and safety analysis in response to public comments.*

This post-DEIS analysis involved testing two additional TSM alternatives through the Green Park Historic District. The analysis employed additional traffic modeling tools and design guidelines to evaluate the feasibility of these new TSM alternatives. The analysis scope included roadway segments and intersections and involved evaluating the operational and safety aspects of the TSM alternatives.

The results of this analysis are presented in Section 2.3.7 of this FEIS. This section concludes that these additional TSM alternatives through the Historic District would pose substantial safety and operational issues in the future because of high projected traffic volume, severe geometric and terrain constraints, and high percent of truck traffic in the corridor.

Comment: How is the level of service goal for US 321 determined? Does the state allow level of service goals to change based on local conditions or circumstances? The Purpose and Need chapter of the DEIS states that the level of service (LOS) goal for US 321 is C or better (page 1-11). This goal is based on “typical” practice in North Carolina and on *A Policy on Geometric Design of Highways and Streets*, prepared by the American Association of State Highway and Transportation Officials (AASHTO, 2000). The LOS C goal does not seem to be mandated by North Carolina law or policy, indicating that it can change based on local conditions or preferences. That was the case for the TSM analysis. Section 2.3.5 of the DEIS states: “Given the community, cultural and natural resources of the project area, the TSM analysis also examined two conservative assumptions for the TSM alternative: 1) That LOS D would be acceptable in the design year; and 2) That community, cultural and natural resource priorities would take precedent over the travel comfort of October and summer travelers so long as LOS D was achieved during week weekday peaks” (page 2-42).

Response: *Exhibit 2-32 of the AASHTO book referenced in the comment provides guidelines for appropriate level of service. From this guidance, the appropriate level of service for US 321 would be C. However, the commenter is correct in the assumption that the state does not mandate an appropriate level of service. The intent is to obtain the best level of service practical for a given area. Guidance from the FHWA further reinforces this policy by stating that one should not design for failure. The NCDOT’s interpretation of this has been that less than LOS D is not acceptable. See the additional explanation in the response to the following comment.*

Comment: What is an acceptable level of congestion? In evaluating the TSM options, the DEIS states that “Since the weekday peak represents the 190th to 275th peak hour US 321 in Blowing Rock would be congested roughly six to 12 percent of the time over the course of the year in 2025. Based on these findings, TSM improvements would not meet the purpose of providing an adequate level of service through 2025.” It is not clear why the DEIS concludes that six or 12 percent is unacceptable, because such a policy position is open to debate and consensus among stakeholders, much like the LOS goal. Is there additional policy guidance that would dictate what is an acceptable level of congestion on US 321?

Response: *The NCDOT’s policies on level of service goals and the acceptability of lesser levels of service were presented in the response to the fourth comment in this section. The statement quoted above from the DEIS is actually erroneous, and the*

NCDOT appreciates commenter calling it to their attention. It pulls information from the 1998 chart in Figure 2-10 of the DEIS, but refers to it as if it applies to the year 2025. Accurately stated, it should say, “Since the two-lane alternative and the three-lane alternative would reach capacity during the 190th and 275th peak hour, respectively, US 321 in Blowing Rock would be congested roughly six to 12 percent of the weekday day time (12 hours) over the course of the year in 1998.” But even accurately stated, it is confusing to the reader and it does not illustrate the point the study team was trying to make. The project is being designed for 2025 traffic, not 1998 traffic. Also the 2025 information presented in the charts that make up DEIS Figure 2-10 to Figure 2-12 (FEIS Figure 2-11 to Figure 2-13) is all relevant and not just that in DEIS Figure 2-10 (FEIS Figure 2-11). For example, the 2025 chart in DEIS Figure 2-10 shows that the first through the 1000th peak hour traffic volume in 2025 exceeds the capacity of the 2-lane or the 3-lane alternative. Since the statement, even corrected, remains hard to follow and unhelpful in explaining the intended point, it does not appear in the FEIS, but was replaced with a clearer explanation in Section 2.3.6 under “Ability to Meet the Project’s Purpose and Need.”

Comment: Research conducted by DOTs in other states indicates that two lane divided cross-sections have fewer crashes than four lane roads, particularly four-lane undivided roadways. Has there been an analysis of the accident rate (crashes per vehicle mile of travel) for the TSM option versus the four-laning option using projected traffic volumes? Similarly, has the state examined crash rates on this section of US 321 with other state roadways with similar geometry, volumes and grade?

***Response:** The NCDOT does not maintain statewide average crash rates for two lane divided roads regardless of terrain, grade, or volume. Statistically significant samples of two lane divided roads in North Carolina do not exist for average crash rates to be developed.*

Currently, the NCDOT does not have a standard practice for predicting crash rates for future years (i.e. design year) for recommended alternatives. The DEIS (and FEIS) does not provide an accident rate analysis for the TSM alternative versus any other alternative, including the preferred four-lane option as this is not the NCDOT’s standard practice.

The NCDOT developed crash rates for existing US 321 from historical crash data. These were compared to average and critical crash rates for other roads with similar characteristics in North Carolina. For example, the actual crash rate for the rural two-lane segment of US 321 was compared to the statewide average and critical crash rates for rural two-lane US routes. This statewide average is comprised of US routes with all types of terrain, grades, and volumes. The same comparisons were made for the urban segment of US 321. This approach follows the current NCDOT standard practice for crash rate comparisons.

7.9 Agency Comments and Responses

This section responds to written comments on the DEIS submitted by state and federal environmental resource and regulatory agencies and local governments and commissions. The comments in the sections that follow consist of quotes from the correspondence received. The original correspondence is presented in Appendix A.

7.9.1 Federal

US Department of Agriculture – Natural Resources Conservation Service

Comment: “The Natural Resources Conservation Service does not have any comments at this time.”

Response: No response needed.

US Army Corps of Engineers

Comment: “The Town of Blowing Rock and both Caldwell and Watauga Counties are participants in the National Flood Insurance Program (NFIP). Based on a review of panels 125 and 175 of the August 1988 Caldwell County, North Carolina and Incorporated Areas Flood Insurance Rate Map (FIRM), the proposed roadway improvements would not be located in an identified flood hazard area. This is confirmed by a review of the pertinent United States Geological Survey topo of the area.

From a review of panel 193 of the January 1997 Watauga County, North Carolina and Incorporated Areas FIRM, the widening alternative appears to cross or otherwise involve the flood plain at two locations of Middle Fork, a detailed study stream with 100-year flood elevations determined and a floodway defined. The stream and floodway are crossed at the southernmost location of the two areas. Based on a review of panel 194 of the FIRM, it appears that Alternatives 4a and 4b would cross Middle Fork and Aho Branch near its confluence with Middle Fork. Aho Branch is also a detailed study stream. We note that the areas of involvement are discussed on page 4-109 of the Draft Environmental Impact Statement (DEIS).

The proposed improvements should be designed to comply with the requirements of the NFIP, administered by the Federal Emergency Management Agency (FEMA) and all local ordinances.”

Response: The project will be designed to comply with the requirements of the NFIP, administered by the Federal Emergency Management Agency (FEMA) and local ordinances.

Comment: “The Regulatory Division has completed a review of the DEIS, and we have the following comments. All of the identified Build Alternatives would require Department of the Army permit authorization under Section 404 of the Clean Water Act. Considering the potential level of impacts to jurisdictional waters and wetlands described in the DEIS, we anticipate requiring an individual permit for any of the Build Alternatives.

Our public review process for this project is ongoing; therefore we cannot state a preference for any alternative at this time. We should have the necessary public input by the scheduled November 20, 2002 Merger Process Project Team meeting to recommend a preferred alternative. We wish to reiterate our position from the January 18, 2001 Merger Process Project Team meeting, however. As you are aware, we did not concur with carrying Alternative 4 forward for detailed study in the DEIS. Sufficient information was available at that time to conclude that the potential impacts to aquatic resources, wildlife and forest resources, and visual/aesthetic resources would be significantly higher with Alternative 4 than with either Alternative 1 or the Widening Alternative. This situation has not changed. Alternative 4 would involve 14 to 15 additional stream crossings, and culverted stream loss would be up to 5545 linear feet higher. Secondary and cumulative stream impacts would be magnified by the terrain and the steep channel gradients, approximately 60 additional acres of forest would be cleared, and the viewshed of the Blue Ridge Parkway would be adversely affected. Other problems with Alternative 4

affecting aquatic resources include the large volumes of excavation and fill material, the length of the required construction time, the disposal of waste material in extremely steep terrain, securing adequate compensatory stream mitigation within the appropriate hydrologic units, and the extreme cost of construction and mitigation. A preliminary evaluation of compliance of Alternative 4 with the Section 404(b)(1) Guidelines of the Clean Water Act indicates potential noncompliance with these Guidelines. That is, there are available, practicable alternatives (Alternative 1, Widening Alternative) having less adverse impact on the aquatic ecosystem that are without other significant adverse environmental consequences. Under our regulations, a Department of the Army permit is not available if it does not comply with the 404(b)(1) Guidelines. For these reasons, we continue to find Alternative 4 unacceptable.”

***Response:** The NCDOT will apply for the permit the USACE requires under Section 404 of the Clean Water Act. The NCDOT did not recommend either Bypass Alternatives 4A or 4B as the Least Environmentally Damaging Practicable Alternative at the Merger Team meeting nor pursue it as the preferred alternative.*

US Department of Commerce – National Ocean Service (NOS), National Geodetic Survey

Comment: “All available geodetic control information about horizontal and vertical geodetic control monuments in the subject area is contained on the National Geodetic Survey's home page at the following Internet World Wide Web address: <http://www.ngs.noaa.gov> After entering the this home page, please access the topic "Products and Services" and then access the menu item "Data Sheet." This menu item will allow you to directly access geodetic control monument information from the National Geodetic Survey data base for the subject area project. This information should be reviewed for identifying the location and designation of any geodetic control monuments that may be affected by the proposed project.

If there are any planned activities which will disturb or destroy these monuments, NOS requires not less than 90 day's notification in advance of such activities in order to plan for their relocation. NOS recommends that funding for this project includes the cost of any relocation(s) required.”

***Response:** During final design, the NCDOT will identify the location of geodetic control monuments that may be affected by the proposed project. The proper notifications will be provided and the relocation of affected monuments will be funded by the NCDOT.*

US Department of the Interior

Comment: “Preparers of the DEIS are to be commended for addressing early National Park Service (NPS) input referencing our concerns about status of the Blue Ridge Parkway (Parkway) being eligible for listing as a National Register property, importance of scenic viewing areas to visitors, and potential viewing area impacts related to all alternatives. Viewing area inventory and analysis data provided to DEIS consultants were fairly presented in the DEIS. However, NPS reviewers found that not all of the available data related to the Parkway was included in the DEIS. Data that the NPS believes to be relevant to the evaluation of proposed Parkway crossing segments are also included as comments and in support of the Department's conclusions.

At a January 18, 2001 meeting, the team discussed the alternatives to be studied in detail and agreed to drop Bypass Alternatives 2 and 3. Both NPS and the Fish and Wildlife Service (FWS) remained opposed to Bypass Alternative 4A and 4B (4A/B). While the NCDOT agreed to drop Alternatives 2 and 3, they insisted that Alternatives 4A/B remain as an alternative that would be studied in detail. The alternative options 4A and 4B would cross the Blue Ridge Parkway at Milepost 291. NPS and FWS signed a concurrence form that included only the Widening

Alternative and Bypass Alternative 1A and 1B. Resource agency opposition to Alternatives 4A/B is noted in the DEIS.

Based on the DEIS presentation in the Affected Environment and Environmental Consequences Visual and Aesthetic Quality sections, the Department prefers the Widening Alternative. This alternative would widen US 321 from two lanes to four lanes from Blackberry Road through the town of Blowing Rock. Under this alternative there would be very minor additional impacts to the natural environment, Parkway lands, and scenic viewing areas beyond what occurred in the 1970's when US 321 was widened to four lanes by removing a historic Parkway stone arch bridge. Bypass Alternatives 1A and 1B are also acceptable to the NPS because the visual changes occurring as a result of the roadway alignment locations minimally affect Parkway scenic view areas. Bypass Alternatives 4A and 4B based upon the DEIS impact analysis would both substantially impact Parkway scenic view areas at Thunderhill.

The impact of Alternative 4A/B to aquatic resources and terrestrial wildlife habitat are greater when compared to any of the other alternatives. The costs are essentially double and triple the next most expensive alternative. Alternatives 4A/B would cross approximately five times the number of streams, and a large block of mostly roadless, upland habitat in the headwaters of the Yadkin River, which would be fragmented.”

***Response:** The NCDOT assessed Bypass Alternatives 4A and 4B in the DEIS because there existed a strong desire on the part of a substantial number of local citizens that a bypass that followed the Blowing Rock escarpment and passed under the Blue Ridge Parkway in a tunnel be evaluated in the DEIS. The NCDOT's mission, under SEPA regulations, extends beyond environmental permits to include the concerns of a broad range of stakeholders, including the public.*

Comment: “In Table S-1 (pp. ix and x) the visual impact of cuts and fills that is identified to affect the Tunnel Hill Overlook on the Parkway would provide sufficient reason to consider Alternatives 4A and 4B too great an impact from an historic resource perspective. Therefore, these alternatives are contrary to the legislative mandates of the Parkway. (See visual analysis study indicated on Figure 3-4).”

***Response:** The concern is noted. The NCDOT did not recommend either Bypass Alternative 4A or 4B as the Preferred Alternative.*

Comment: “In item two of the Environmental Commitments section it is stated that a Memorandum of Agreement (MOA) will be developed among the Federal Highway Administration (FHWA), the NCDOT, the State Historic Preservation Officer, the Advisory Council of Historic Preservation (ACHP), and the NPS for mitigating effects for the preferred alternative, if one is selected that has an adverse effect on a historic resource listed on or eligible for inclusion in the National Register of Historic Places.

This is a particularly important commitment on the part of NCDOT, since the Parkway is noted on the top of Page 3-40 and elsewhere in the DEIS as "eligible for listing" on the National Register. This Parkway status will mean that any potential effects on the Parkway from any preferred alternative must be evaluated as part of the Section 106 compliance process in order to determine the complete character of such effects.”

***Response:** The NCDOT did not recommend an alternative that adversely affects the Blue Ridge Parkway as the Preferred Alternative. A Memorandum of Agreement was signed*

for mitigation of adverse effects to National Register properties adversely affected by the Widening (Preferred) Alternative.

Comment: “3.1.5 COMPREHENSIVE PLANNING, *Blue Ridge Parkway* -- The section on page 3-17 starting: "Conserve and provide for the enjoyment. . . needs to end the sentence with "Southern Appalachian Mountains." The word "Southern" was incorrectly omitted here.”

Response: *This correction is made in the FEIS.*

Comment: “3.2.2 COMMUNITY FACILITIES AND RESOURCES, *National Park System Units* -- Last complete sentence on page. Change "Just south of the current US 321 . . ." to "Just south of the current US 321 . . .”

Response: *This correction is made in the FEIS.*

Comment: “3.7.2 ARCHAEOLOGICAL RESOURCES -- Reference the specific approval dates, position titles and language from the NPS Southeast Archeological Center authorities' final acceptance of the contractor's archeological survey results.”

Response: *Richard Vernon, Supervisory Museum Specialist, approved the field documentation for archaeological surveys within the Blue Ridge Parkway in a letter dated September 6, 2001. (See the letter in Appendix A.)*

Comment: “3.8.3 THE BLUE RIDGE PARKWAY -- The planned tunnel construction beneath the Parkway as shown in Alternative 4A and Alternative 4B does not sufficiently solve the visual, historical, or cultural impacts to the Parkway, so would most likely be included in this listing as a significant impact to the Parkway. Another crossing of the Parkway by US 321 would again significantly impact the Parkway since it already has done so at the existing crossing. The Widening Alternative and Alternative 1A and Alternative 1B would not significantly impact the Parkway any more than it already has in that location.”

Response: *The concern is noted. Impacts to the Parkway are discussed in Section 4.7.3 in Chapter 4 of the DEIS. The NCDOT did not recommend either Bypass Alternative 4A or 4B as the Preferred Alternative.*

Comment: “3.10.1 TERRESTRIAL RESOURCES, *Plant Communities*-- The cuts and fills shown to occur along Alternatives 4A and 4B leading to the Parkway from both directions will provide little opportunity to restore the natural plant communities and landscape of this area. The modification would change the most desired open view from the Parkway to a tunnel view, that research has found to be the least desirable view from the Parkway. Therefore, this would provide reason to consider these alternatives a significant impact to the Parkway. Please see *Visual Preferences of Travelers along the Blue Ridge Parkway*, 1988, Francis P. Noe and William E; Hammitt.”

Response: *The concern is noted. Impacts to the Parkway are discussed in Section 4.7.3 in Chapter 4 of the DEIS. The NCDOT did not recommend either Bypass Alternative 4A or 4B as the Preferred Alternative.*

Comment: “3.10.3 THREATENED OR ENDANGERED SPECIES, *Federal Listed Species* -- Although mentioned as a species with potential presence, Allegheny woodrat is not addressed. Neither is the southern Appalachian Saw-Whet Owl, which occurs in the nearby area. There is

potential to impact both species, if they indeed are present. The Saw-Whet Owls are quite mobile and are documented at elevations just below 4,000 feet on the Parkway nearby. They could be disturbed by noise and light pollution associated with the alternative routes.

Another species not mentioned is rock gnome lichen (*Gymnoderma lineare*). Although the likelihood of it being in the impacted area may be low, it is present. Nearby, hibernating Virginia big-eared bats (*Corynorhinus townsendii virginianus*) are also present on nearby Grandfather Mountain and there might be potential for maternity colonies to be near.

Given the number of wetlands, there may be potential for amphibian species of concern that are not noted. It is also of concern to the NPS if bog turtle or timber rattlesnakes are present in the project area.”

Response: *A complete listing of protected species known to occur in Caldwell and Watauga Counties is included in Section 3.10.3 in Chapter 3 of the DEIS and FEIS. It has been updated in the FEIS. The Allegheny woodrat is not a State listed threatened or endangered species. The habitat for the Appalachian Saw-Whet Owl does not exist in the project area. The rock gnome lichen, timber rattlesnake, and the Virginia big-eared bat are not known to occur in Watauga or Caldwell Counties. At the request of the US Fish and Wildlife Service, a habitat assessment was conducted for the Virginia big-eared bat. No habitat was found (see Section 4.9.4 in Chapter 4). Regarding the bog turtle, the DEIS in Section 4.10.4 of Chapter 4 and the FEIS in Section 4.9.4 of Chapter 4 indicate that it is listed as Threatened because of Similarity of Appearance (T[S/A]). Section 7 (of the Endangered Species Act) consultation and a biological conclusion are not required for T(S/A) species. In addition, landscape and drainage alterations by humans and continual disturbance in commercial and residential areas make it highly unlikely that bog turtles occur in project area wetlands.*

Comment: “4.3 VISUAL AND AESTHETIC QUALITY -- Inventory and data analysis presented in these sections followed the current Parkway Scenery\Management System procedures, thus facilitating staff review and comment. Much of the available data provided by Parkway resource planning staff was utilized in the DEIS. Its synthesis and presentation was unbiased, clear and to the point.

4.3.2 WIDENING ALTERNATIVE, *Landscape Unit Six* -- Park staff agrees with conclusions stated here.

4.3.3 BYPASS ALTERNATIVE 1A, *Landscape Unit Six* -- Park staff agrees with conclusions stated here.

4.3.4 BYPASS ALTERNATIVE 1B, *Landscape Unit Six* -- Park staff agrees with conclusions stated here.

4.3.5. BYPASS ALTERNATIVE 4A, *Landscape Units One, Six and Seven* -- Park staff agrees with conclusions stated here.

4.3.6 BYPASS ALTERNATIVE 4B, *Landscape Units One, Six and Seven* -- Park staff does not completely agree with conclusions stated here. While bridges eliminate the need for large cuts and fills, there would still be the introduction of a major structure that is incongruent with the existing forested slope. While bridges are less impacting, the overall impact is still considered substantial to us on the intactness score alone.”

Response: *The concern with Bypass Alternative 4B is noted. The NCDOT did not select Bypass Alternative 4B as the Preferred Alternative.*

Comment: “4.6.1 HISTORIC RESOURCES, *Blue Ridge Parkway* -- This several page section presents a thorough description and analysis of the effect of the alternatives on the Parkway as an historic property. The DEIS finds that Bypass Alternatives 4A and 4B would have an Adverse Effect because introduction of new visual elements into the view areas rise to the level that they would diminish the integrity of the Parkway's significant historic features.”

Response: *No response needed. The NCDOT did not select Bypass Alternatives 4A or 4B as the Preferred Alternative.*

Comment: “4.8 SECTION 4(f) RESOURCES -- We have two separate but related concerns.

In the DEIS, paragraph three under this section it is stated that "None of the alternatives would use property from...the Blue Ridge Parkway." While Bypass Alternatives 4A and 4B would pass under the Parkway not disturbing land surface features they would however affect Parkway subsurface lands. NPS must consider this as a transfer of lands by the Federal government for highway use. If either of the 4A or 4B bypass alternatives are selected, then the means to transfer a right-of-way will need to be determined by the NPS. This will require NEPA compliance and may require an equal value exchange to facilitate the State's acquisition of the right-of-way; and, as such, this cost should be added to the overall cost of the project.

Our other concern is that of constructive use of parkway lands. The discussion on Section 4(f), constructive use was lengthy, and the NPS position on this matter was well presented in the DEIS. However, the Department does not agree with the determination by the FHWA that constructive use does not apply upon their finding that none of the alternatives would affect the Parkway in a manner serious enough to substantially impair the parkway elements, which qualify for resource protection under Section 4(f).

This FHWA finding seems to say that because the Parkway is so long and has so many overlooks the immediate effects of this specific project are negligible. This finding ignores the cumulative nature of land use change impacts now occurring to the Parkway over its 469-mile length. If the impairment determination were to be based upon severity of impacts at this location, then the geographic limits of the Parkway for those impacts to be evaluated should have been limited to that area. The NPS believes that the Parkway's significance is the sum of all of its parts, when one is degraded the overall value is diminished.

The last paragraph under this section states, "This conclusion does not diminish the importance of the impacts to the Blue Ridge Parkway as a factor in the selection of a preferred alternative." The NPS strongly concurs with that statement.”

Response: *The concerns are noted. The NCDOT did not select either Bypass Alternative 4A or 4B as the Preferred Alternative.*

Comment: “4.16 SECONDARY AND CUMULATIVE IMPACTS -- It would seem that the cumulative impacts identified for the Widening Alternative including Alternative 1A and Alternative 1B does not significantly impact Blowing Rock and its surrounding communities to warrant making Alternative 4A or Alternative 4B the preferred alternatives, neither to the Parkway or these surrounding communities.

4.16.4 Bypass Alternatives 4A and 4B -- There appear to be several issues with the tunnels that are not discussed in the statement. Although it is stated that Section 4(f) does not apply to NPS lands because of the tunnel, there are many impacts that may be detrimental, long-term or cumulative to the Park. These include the increase in adjacent impacts from light, noise, and air pollution from use of the tunnels.

A structure that is as large as this tunnel and with as much maintenance (see buildings, and parking, personnel, etc., associated with the tunnel) will attract visitors. No mention is made of long-term maintenance of the tunnels, the impact of potential hazmat spills, unforeseen problems with bedrock, etc. During construction of the tunnel, there is no mention of possible impacts if tunnel were damaged by wreckage, explosions, etc.

Although mentioned, development along the Alternative 4 routes will undoubtedly impact Parkway aesthetics, wildlife, and viewsheds to a greater extent, especially long-term, than is noted. Also mentioned, but not fully developed, is the introduction potential for invasion of undesirable and introduced vegetation.”

***Response:** The concerns are noted. The NCDOT did not select either Bypass Alternative 4A or 4B as the Preferred Alternative.*

Comment: “*NATURAL RESOURCES, Water Resources -- Reference Alternative 4A versus Alternative 4B water quality impacts due to number of bridges: Bridges will not necessarily have fewer impacts on water sources, as there will still be all the contaminants from runoff. In addition, bridges are more frequently and more heavily treated with road salt and other melting agents and abrasives during freezing weather. This could result in more contaminants having potential for impacting the streams from the bridges than from a conventional roadway.*”

***Response:** The concerns are noted. The NCDOT did not select either Bypass Alternative 4A or 4B as the Preferred Alternative.*

Comment: “APPENDIX D DESIGN AND LANDSCAPE DRAWINGS FOR THE BUILD ALTERNATIVES -- In viewing the design drawings for each alternative it would seem that the Widening Alternative accommodates increased traffic needs the best. The other four recommended alternatives seem to address the desire for a road bypass by the surrounding communities. The alternative chosen should depend on the overriding need to provide a means of supporting increased traffic in the area, or the desire for a community bypass. It is not in the best interest of the NPS to support the community's need for a community bypass road considering the impacts these alternatives would have on the Parkway.

The Department is opposed to Alternatives 4A/B. The impacts to aquatic resources and terrestrial wildlife habitat are greater when compared to any of the other alternatives. Alternatives 4A/B would cross approximately five times the number of streams, and a large block of mostly road less upland habitat in the headwaters of the Yadkin River, which would be fragmented. We believe that widening the existing roadway would have the least effect on the natural environment and the Parkway and would meet the stated purpose and need for the project.”

***Response:** The position is noted. The NCDOT did not select either Bypass Alternative 4A or 4B as the Preferred Alternative.*

US Environmental Protection Agency

Comment: “EPA agrees with the purpose and need for these improvements to this section of US 321 as described in the DEIS.”

Response: *The position is noted.*

Comment: “Noise -- Since noise mitigation was not found to be cost effective, EPA encourages NCDOT to consider landscaping enhancement and scenic screening measures such as earthen berms, retaining walls and vegetative plantings as space allows. In particular, we strongly urge the consideration of these measures for those residential areas expected to experience severe increases in noise levels as a result of a selection of any of the four bypass alternatives on new alignment. Generally, for the Widening Alternative in the more urban area, we believe that such measures can be best meshed with other historic and scenic enhancements.”

Response: *The position is noted. Landscape enhancements, particularly for Historic Resources, are noted in the Memorandum of Agreement and the Memorandum of Understanding in Appendix G and illustrated on the drawings contained in Appendix D. One hundred feet of dense vegetation is required to make a noticeable decrease in noise levels. As such, the proposed landscape enhancements will not reduce traffic noise levels at adjoining sensitive receptors. Earthen berms would require additional right-of-way with the associated impact to surrounding development. Retaining walls do not reduce noise.*

Comment: “The impact of stream crossings should be mitigated by the retention of vegetative buffers wherever practicable.”

Response: *During final design, the practicability of vegetative buffers will be considered at stream crossings.*

Comment: “EPA believes that because of the scarcity of these wetlands (see the attached comments for the discussion of methodology) they should merit very high functional ratings for diversity of wildlife habitat and be avoided to the maximum extent practicable.”

Response: *Any one of the alternatives evaluated in the DEIS would affect less than a tenth of an acre of wetland (see Table 4-30 in Chapter 4 of the FEIS). This issue was discussed in detail during the Concurrence Point 4A Meeting (see Section 7.10.2) and during final design wetland impacts will be avoided to the extent practicable.*

Comment: “All of the alternatives result in some direct environmental concerns; and there is not one alternative that is clearly environmentally superior to all of the others. That said, one alternative is clearly more damaging than the other alternatives. Therefore, we rate Alternative 4A more severely than the other alternatives assigning it an "EO" rating (environmental objections). This rating is assigned primarily because this configuration would present the greatest visual impact relative to the Blue Ridge Parkway, and it would result the greatest impact on the natural habitat. The placement of this alternative and its cut-and-fill configuration would bisect a generally undisturbed forested Blue Ridge escarpment and greatly hinder wildlife movement. Crossing 14 of the 20 streams with fill and culverts make this alternative substantially more damaging than Alternative 4B, which maximizes the use of bridging instead of cuts and fills.

Otherwise, there remain major tradeoffs between the alternatives that would result in impacts to the natural environment or impacts to the various cultural and economic resources. Accordingly, EPA is rating the Widening Alternative and the other bypass Alternatives 1A, 1B and 4B as "EC" (environmental concerns). The Widening Alternative provides substantial transportation benefits while generally minimizing environmental impacts, and therefore should get continued consideration if the Town of Blowing Rock's and historic/cultural concerns can be adequately addressed.

EPA is assigning the DEIS a sufficiency rating of "I" since we believe that the document reflects a comprehensive and objective analysis of all pertinent environmental parameters. However, as discussed above, we see the need for further coordination with the Town and other stakeholders on the Widening Alternative to see if additional changes can be made in order to address their concerns. Enclosed for consideration are additional comments pertaining to the technical information and analyses.”

***Response:** The position is noted. The NCDOT signed a Memorandum of Understanding with the Town of Blowing Rock agreeing on an approach to mitigating the impacts of the Widening (Preferred) Alternative (see Appendix G) within the Town of Blowing Rock.*

Comment: “Socio-Economic -- In 1999, EPA participated in the interagency Merger Team's deliberations about the alternatives to be considered in detail in the EIS. The alternatives remaining under consideration at that time were: to widen existing US 321 on its present alignment; a bypass on new location through the eastern portion of the Town of Blowing Rock (Alternative 1); and, a complete bypass to the east of the town on new location through forested land and tunneling under the Blue Ridge Parkway (Alternative 4). The Widening Alternative already was receiving considerable analysis by NCDOT. TSM provisions were applied as were enhancements for making the project compatible with the surrounding development. EPA and the other environmental resource agencies were presented with the results of the work by NCDOT. However, although no concurrence was reached because of major environmental issues against retaining Alternative 4 for further analysis, NCDOT decided to carry it forward along with the Widening Alternative and Alternative 1 for more detailed analysis in the DEIS.”

***Response:** The NCDOT indicated at the concurrence meeting that it intended to include Bypass Alternatives 4A and 4B in the DEIS because there existed a strong desire on the part of a substantial number of local citizens that a bypass that followed the Blowing Rock escarpment and passed under the Blue Ridge Parkway in a tunnel be evaluated in the DEIS. The NCDOT's mission SEPA regulations, extends beyond environmental permits to include the concerns of a broad range of stakeholders, including the public. Although Bypass Alternative 1 and 4 were evaluated, the Widening Alternative was selected as the Preferred Alternative.*

Comment: “Data cited for population and economic trends rely on the 1990 Census and other data from the 1990s. While there are estimates for year 2000 population, etc., this information should have included the year 2000 Census data.”

***Response:** At the time the DEIS was prepared, 2000 Census was not available for the project area except for total state, municipal, and county population numbers. During the preparation of the FEIS, race, poverty, and income figures have been updated using 2000 Census data. Conclusions related to the presence or absence of minority or low-income households did not change when 2000 Census data is applied.*

Comment: “Community cohesion, according to the document, is a negative factor for the bypass alternatives only. EPA considers the addition of two additional lanes to be a negative factor for the Widening Alternative but not to the degree of impediment that a new, controlled access roadway presents to existing communities. Two neighborhoods are identified as being impacted by each of the bypass alternatives. Without more specific information, it seems likely that the community cohesion impact along the Alternative 1 corridor would be more severe than along Alternative 4.”

***Response:** In Section 4.1.5 in Chapter 4 of the DEIS and FEIS, the impact on community cohesion of adding two new lanes to existing US 321 is noted in the first paragraph of the discussion of the effect on community cohesion of the Widening (Preferred) Alternative. The specific characteristics of that affect are described in the paragraphs that follow. Figure 3-1 of the DEIS and FEIS reflect the greater extent of residential development in the Bypass 1 corridor compared to the rural Bypass 4 corridor. The substantial displacement, noise, visual, and neighbor separation affects of placing a bypass in the Bypass 1 corridor are also described in Section 4.1.5. The NCDOT concurs that the community cohesion impact would be greatest in the Bypass 1 corridor.*

Comment: “Economic Impacts -- This analysis evaluated the potential impact on businesses of the various alternatives. It was very informative regarding one of the key project issues. This type of analysis should be standard for all improvement projects considering a bypass of commercial business districts.

We agree with the findings that construction of the Widening Alternative would be highly disruptive to US 321 businesses. The findings about business impact following construction, however, are the most interesting and of greater importance. The key factor is the differentiation of businesses by the proportion of opportunity and destination types of sales. Blowing Rock, being a resort, has a destination-dominant economy. Bypass alternatives were found to result in an overall loss of sales revenue just under 12 percent to existing US 321 businesses, while the incorporation of a landscaped median along a 4-lane US 321 would result in lost sales of just under 3 percent. Please clarify what time frames are meant by post-construction near term and longer term impacts in the analysis.”

***Response:** Short-term is the time in which existing businesses may be affected. Longer-term reflects the time in which the business mix may change in response to changed access conditions. No specific time frame is assumed, it depends on whether the economy is slow or robust.*

Comment: “We note that the town desires to retain a "village appeal" which we assume would include the commercial area of US 321. One factor to consider is how excessive traffic speed could hinder this goal along this long, straight section of US 321. NCDOT has done an excellent job addressing the appearance of a widened right-of-way, but has not fully addressed the importance of speed control through the commercial district and the associated pedestrian safety issues.”

***Response:** The posted speed of the Widening Alternative will be 35 mph, no higher than it is today. Since US 321 is a regional thoroughfare, traffic calming techniques used on collector and local streets as a means for slowing traffic are inappropriate. Speed control on a thoroughfare is the responsibility of law enforcement officers. In completing the design for this project, NCDOT discussed this concern with the Town of Blowing*

Rock in context of final design decisions. Final mitigation initiatives are discussed in the Memorandum of Agreement in Appendix G.

Comment: “There is an emphasis in the document to highlight the natural and historic attributes of this mountain community. The document strongly infers a direct relationship between the quality of these attributes to the economic success and general appeal of the Blowing Rock community. We agree with this relationship.”

Response: *No response needed since the comment acknowledges and affirms what is presented in the DEIS and FEIS.*

Comment: “We note the substantive analysis of the potential economic impact to businesses along present US 321. Given that Blowing Rock has a tourist-based economy, it was interesting that the analysis concluded that the Widening Alternative (with landscaped median) would have minimal adverse impact on sales revenue, and that all of the bypass alternatives would result in greater loss of sales revenue. Part of the overall economic issue which NCDOT, FHWA must deal with is the great disparity in the total costs of the alternatives.”

Response: *Cost was one of many factors considered in the identification of the NCDOT Preferred Alternative.*

Comment: “Natural Resource Impacts -- Discussed on page 3-66 is the NC Division of Water Quality's (DWQ) methodology, which was utilized to assess the functional importance of the wetland resources. EPA has stated in comments on other projects its disagreement with this methodology because of the unequal and low weighting of factors for wildlife functional values. In this project area, it is noted that wetland vegetated communities are limited in extent and do not vary substantially among alternatives. We wish to note that the DWQ assessment methodology does not include any factor for wetland scarcity, which is another shortcoming of the methodology. EPA believes that because of the scarcity of wetlands in this project area, the impacted wetlands should merit very high functional ratings for diversity of wildlife habitat.”

Response: *The NCDOT applies the DWQ method and presents the results because it is a method endorsed by the DWQ, another important environmental stakeholder and regulator of Section 401 of the Clean Water Act. The use of area wetlands by wildlife is described in Section 3.10.2 in Chapter 3 of the DEIS under “Wildlife”. Any one of the alternatives evaluated in the DEIS would affect less than a tenth of an acre of wetland (see Table 4-30 in the DEIS and the FEIS). During final design, this impact will be avoided to the extent practicable*

Comment: “Relocations -- Regarding residential relocations, the Widening Alternative affects 16 residences, Alternative 1A affects 24, Alternative IB affects 27 (not 24 as indicated in Table 4-1), Alternative 4A affects 8 and Alternative 4B affects 6 residences. According to the DEIS, replacement housing in the \$40,000-100,000 price range may not be readily available in the area. The issue of adequate replacement housing should be more fully addressed in the FEIS.”

Response: *The information regarding relocations presented in the DEIS and the FEIS was developed in the field by the NCDOT Right-of-Way Division based on the preliminary designs prepared for the impact assessment. It is correct. The NCDOT's replacement housing assistance program is described in Section 4.1.1 of Chapter 4.*

7.9.2 State

Department of Environmental and Natural Resources – Division of Environmental Health

Comment: “If exiting water lines will be relocated during the construction, plans for the water line relocation must be submitted to the Division of Environmental Health, Public Water Supply Section, Technical Services Branch.”

Response: *Plans will be submitted as required.*

Department of Environmental and Natural Resources – Division of Forest Resources

Comment: ...”1. The construction of the roadway will impact forestland, ranging from 27 acres for the Widening Alternative to 93 acres for Alternative 4A. 2. We support the selection of Widening Alternative as it impacts the fewest forested acres. However, if for other considerations a bypass were deemed necessary we would support Alternative 1A and 1B.”

Response: *The position is noted. The Widening Alternative was selected as the Preferred Alternative.*

Department of Environmental and Natural Resources – Division of Water Quality

Comment: “A) The DWQ is a participating member of the NEPA/404 Merger Team for this project. We look forward to working with the team in the selection of the Least Environmental Damaging Practicable Alternative (LEDPA).”

Response: *Comment noted. No response needed.*

Comment: “B) On January 18, 2001, a NEPA/404 Merger Team meeting was held to select the alternatives for detailed study (Concurrence Point 2). The team agreed to study Widen Existing Alternative and the new location Bypass Alternative 1. Based on the agreed upon protocols for the Merger Process, DOT should have only studied those two alternatives. However, DOT developed a document that included two variants of the Alternative, New Location Alternative 4 (Alternative 4A and 4B in the document), and two variants of the New Location Bypass Alternative 1 (labeled as 1A and 1B in the document). In short, DOT continued to study an alternative that the team agreed to drop, and added two new alternatives. As such, the signed Concurrence Point 2 is now considered by the NCDWQ to be invalid. A new meeting to discuss and agree upon Concurrence Point 2 will need to be held, and new DEIS or supplemental DEIS may prove necessary.”

Response: *The Merger Team’s concurrence at Concurrence Point # 2 was on detailed study corridors and not on particular project designs. The two alignment options for the Bypass 1 corridor, that is, Bypass Alternatives 1A and 1B, both fall within the Bypass 1 corridor agreed upon by the Merger Team at Concurrence Point 2. Likewise, both alignment options for the Bypass 4 corridor (Bypass Alternatives 4A and 4B) fall within the Bypass 4 corridor presented to the agencies at Concurrence Point 2. The NCDOT indicated at the concurrence meeting that it planned to evaluate two designs in the Bypass 1 corridor. All four bypass designs (1A, 1B, 4A, and 4B) were presented at the concurrence meeting. The NCDOT indicated at the concurrence meeting that it intended to evaluate the Bypass 4 corridor in the DEIS because there existed a strong desire on the part of a substantial number of local citizens that a bypass that followed the Blowing Rock escarpment and passed under the Blue Ridge Parkway in a tunnel be evaluated in the DEIS. The NCDOT’s mission SEPA regulations, extends beyond environmental permits to include the concerns of a broad range of stakeholders, including the public.*

Subsequent to this letter, the DWQ representative signed concurrence forms related to the selection of a Least Environmentally Damaging Practicable Alternative (LEDPA)(concurrence point 3), bridge locations and lengths (concurrence point 2a), and impact minimization (concurrence point 4a).

Comment: “C) At this time, the DWQ does not believe that Alternative 4 is a viable option for the project. Alternative 4 has excessive costs and environmental impacts. The costs for Alternatives 4A and 4B are 170.5 and 250 million dollars, respectively. The cost for the Widening Alternative is 46 million dollars, and Alternatives 1A and 1B are 75.1 million and 92.2 million dollars, respectively. In addition, Alternatives 4A and 4B will result in impacts to 19 and 21 streams, respectively. The Widening Alternative will impact 4 streams, while Alternatives 1A and 1B will impact 4 and 5 streams, respectively.”

Response: *The NCDOT did not recommend Bypass Alternatives 4A or 4B as the Preferred Alternative.*

Comment: “D) The 404 NEPA/Merger Team agreed to study Alternative 1 and the Widening Alternative. Why does the document present two alternatives (Alternative 1 A and 1B) for Alternative 1?”

Response: *See the response to DWQ comment “B” above.*

Comment: “E) The document presents the number of stream crossings anticipated for each alternative. However, it fails to quantify the anticipated total linear feet of stream impacts. Please add the anticipated total impacts to future documentation.”

Response: *The DEIS provided quantities for anticipated linear feet of direct impacts to streams by crossing within each alternative in Table 4-23, Table 4-24, Table 4-25, Table 4-26, and Table 4-27. These same tables are included in the FEIS as Table 4-25, Table 4-26, Table 4-27, Table 4-28, and Table 4-29. The DEIS provided quantities for anticipated total linear feet of direct impacts to streams by alternative in Table 4-28 on DEIS page 4-101 and Table S-1 on page x. These same tables are included in the FEIS as Table 4-30 and Table S-1.*

Comment: “F) The alternatives as presented appear to represent functional roadway design, rather than corridors. While we understand, and even support, the Department of Transportation developing the roadway design as much as possible, as early as possible, it should be noted that further horizontal and vertical realignment may be necessary as part of performing all possible avoidance and minimization prior to issuing the 401 Water Quality Certification.”

Response: *The preliminary designs presented in the DEIS were developed only for the purpose of evaluating corridors and assessing impacts in the environmental impact statement, which is used in the identification of the LEDPA. The designs were not intended to be a final design. The NCDOT will follow proper protocols in securing a 401 Water Quality Certification after final designs are completed.*

Comment: “G) The document does not appear to count impacts to natural systems as a result of bridging. While DWQ encourages the placement of bridges, and considers them essential methods for minimizing impacts, their presence still results in impacts to the systems being crossed. As such, all future documentation should include the anticipated impact from their

placement. It should be noted that the impacts resultant from bridging will not require any compensatory mitigation from DWQ.”

***Response:** For the information of commenter, the natural systems subject to shading by bridges along the Bypass Alternatives are provided below. The Widening (Preferred) Alternative does not include any new bridges. It was assumed that the “natural systems” referred to in the comment include jurisdictional water resources and the relatively undisturbed plant communities (cove forest and chestnut oak forest). Lengths are given in feet and areas are given in acres.*

Bypass Alternative 1A: Natural Systems Subject to Shading by Bridges

Crossing Number	Streams		Wetland Area	Cove Forest Area	Chestnut Oak Forest Area
	Length	Area			
2	80	0.02	----	0.47	----
6	80	0.02	0.03	0.37	----
Total	160	0.04	0.03	0.84	

Bypass Alternative 1B: Natural Systems Subject to Shading by Bridges

Crossing Number	Streams		Wetlands Area	Cove Forest Area	Chestnut Oak Forest Area
	Length	Area			
1	70	0.02	----	----	1.41
2	70	0.01	----	0.27	----
6	100	0.03	0.01	0.38	----
Total	240	0.06	0.01	0.65	1.41

Bypass Alternative 4A: Natural Systems Subject to Shading by Bridges

Crossing Number	Streams		Wetlands Area	Cove Forest Area	Chestnut Oak Forest Area
	Length	Area			
8	230	0.06	----	1.08	----
12	70	0.06	----	----	1.30
24	80	0.08	----	----	----
Total	380	0.20	----	1.08	1.30

Bypass Alternative 4B: Natural Systems Subject to Shading by Bridges

Crossing Number	Streams		Wetlands Area	Cove Forest Area	Chestnut Oak Forest Area
	Length	Area			
1	70	0.02	----	----	0.48
8	195	0.04	----	1.88	----
9	80	0.02	----	0.28	0.51
10	180	0.06	----	0.19	1.05
14	75	0.02	----	0.99	0.77
17	140	0.04	----	0.08	0.33
21	150	0.05	----	0.52	----
22	80	0.02	----	1.08	----
23	180	0.05	0.04	0.35	----
24	80	0.08	----	----	----
Total	1,230	0.40	0.04	5.37	3.14

Comment: “H) As a result of the impacts from proposed bridges not being counted for each alternative, Alternative 4B appears to have much lower impacts to natural systems than is really the case. Please revise the impact totals for this alternative.”

Response: The NCDOT did not recommend Bypass Alternative 4B as the Preferred Alternative.

Comment: “I) On page 4-98, the document indicates that some streams, "...must be filled and moved in order to accommodate the new roadway". As part of issuing the 401 Water Quality Certification, avoidance and minimization to jurisdictional wetlands and streams is necessary. As such, the first order of roadway alignment is to consider moving the road to accommodate the streams. After that has been assessed, then we can consider filling and relocating streams. Please make the necessary changes to the document and roadway designs.”

Response: Wetlands and stream impacts presented in the DEIS were based on construction limits generated as part of the preliminary designs. The preliminary designs avoid and minimize impacts to jurisdictional areas identified during the field delineation and functional analysis. The Merger Team met and concurred on April 20, 2004 on alignment adjustments to minimize impacts to wetlands and surface waters (concurrence point 4a). Coordination with the Merger Team will continue through final hydraulic design and permit drawings (concurrence points 4b and 4c).

Comment: “J) It is difficult to discern the presence of wetlands and streams on the maps presented in the document. Please provide mapping that more clearly shows the proposed alternatives superimposed over the impacted resources.”

Response: *The concern is noted. The specific locations of streams and wetlands are indicated on the design drawings included in the DEIS Appendix D. Jurisdictional area numbering has been added to the design drawings in the FEIS. (See Appendix D.)*

Comment: “K) In reviewing Alternatives 1A and 1B, it appears that several parallel impacts to streams may be avoidable by realigning the proposed road (see comment I). It should be noted that avoidance and minimization of impacts to jurisdictional wetlands and streams is essential prior to issuance of the 401 Water Quality Certification. Please review the design and provide an explanation as to why the road cannot be realigned to avoid or minimize this impact.”

Response: *The NCDOT did not recommend Bypass Alternative 1A or 1B as the Preferred Alternative. Efforts to avoid and minimize impacts to jurisdictional wetlands and streams were made during preparation of the preliminary designs used to assess potential impacts. If one of these alternatives were recommended as the Preferred Alternative, final designers would examine opportunities to further reduce stream impacts.*

Comment: “L) In comparing Tables 4-23 through 4-27, it appears as if the crossing numbers for impacted streams have been established so that alternatives that share the same crossing have the same number. As an example, it appears in reviewing the roadway designs, that the crossing number 1 for Alternatives 4A and 4B is the same stream. However, the impact totals presented in Tables 4-26 and 4-27 are not the same. However, crossing 7 for alternatives 1A and 1B is the same. Please clarify the apparent discrepancy throughout all the tables.”

Response: *The crossing numbers were not established so that alternatives that share the same crossing have the same number. A jurisdictional system is designated a crossing number along a reach that maintains essentially the same physical and hydrological features. To use the examples presented in the comment, crossing 1 is a bank-to-bank stream that exhibits approximately the same physical (substrate, valley slope, stream type) and hydrological (groundwater fed perennial stream) features throughout the approximately 1000-foot reach delineated. Alternatives 4A and 4B cross this stream at different locations, resulting in the difference in potential impacts for crossing 1. The situation for crossing 7 differs in that Alternatives 1A and 1B have the same footprint at this system crossing, resulting in the same potential impacts for both alternatives.*

Comment: “M) Typical roadway cross-sections for the Widen Existing Alternative show varying median widths ranging from 4 feet to 16 feet. One of the negative aspects of the Widening Alternative is the impact to homes and businesses. Please provide an explanation that details the rationale for the varying median widths. In addition, a small median (4 feet) from south of Blowing Rock to the intersection with Possum Hollow Road should be considered for this alternative. If a 4-foot median is not appropriate, please provide an explanation that details the rationale for it not being used.”

Response: *The median width on the Widening Alternative varies from zero to 16 feet. The width of the median varies based on traffic capacity need, environmental constraints, and safety goals. South of the Town of Blowing Rock, the median is four feet wide and provides a minimum separation between opposing directions of traffic in this section that has a 50 mph design speed. Through this section, left-turn demands are low and left-turn lanes are not warranted. Between the southern town limits and US 321 Business no median is provided because of the need to minimize impacts through the historic district and the area between the historic district and US 321 Business. The landscaped median*

shown in the DEIS (Figure 2-18A) in front of the Green Park Inn was removed for the purpose of reducing impacts at the request of Green Park Historic District stakeholders. From Business US 321 to US 221, the median width is 16 feet. A raised, 16-foot median creates a safer road by providing a positive separation between opposing traffic and by regulating where left turns can be made. Furthermore, left-turn lanes can be placed within a 16-foot wide median where needed to provide the capacity necessary to meet the project's purpose and need. This median is provided where environmental constraints allow and where higher left-turning volumes warrant left-turn lanes, specifically, north of US 321 Business.

Comment: “N) In reference to crossing number two on the Widening Alternative, it appears as if the road can be moved to avoid or minimize this impact. Please review the present design and provide new plans that avoid and/or minimize the impact. If the prescribed realignment is not possible, please provide a detailed explanation.”

***Response:** The Preferred Alternative will widen US 321 towards stream number 2 because a steep hillside exists on the opposite side of the road. In addition, an existing sharp curve exists just south of the stream, which is preceded by a short straight section of road and another sharp curve. Widening on the opposite side of the road, while not worsening the existing sharp curve just south of the stream, would necessitate a cut into the hillside that would displace seven homes, one of which is a contributing structure of the Green Park Historic District. This issue was discussed and resolved at the Concurrence Point 2A meeting of the project's NEPA/404 Merger Team. This meeting is discussed in Section 7.10.2.*

Comment: “O) In future documentation, please provide mapping with labels that correspond to the table of impacts. As an example, crossing 2 on the Widening Alternative could be labeled as crossing two on the design drawings.”

***Response:** The concern is noted. Wetland and stream numbering have been added to the design drawings in this FEIS, Appendix D.*

Comment: “P) In reference to crossing 2 on Alternative 1B, it appears as if the impact can be avoided or minimized by moving the roadway alignment. Please review the present design and provide new plans that avoid and/or minimize the impact. If the prescribed realignment is not possible, please provide a detailed explanation.”

***Response:** The NCDOT did not recommend Bypass Alternative 1B as the Preferred Alternative. Efforts to avoid and minimize impacts to jurisdictional streams were made during preparation of the preliminary designs used to assess potential impacts. If this alternative were recommended as the Preferred Alternative, final designers would examine opportunities to further reduce stream impacts.*

Comment: “Q) On page 4-102, the document states that the project would require the use of a Nationwide 14 general permit. Given the magnitude and nature of the impacts, we believe that the project will require an Individual Permit from the US Army Corps of Engineers, and corresponding Individual Certification from the NCDWQ.”

***Response:** Text on page 4-102 in the DEIS states that “Because many of the expected impacts would involve perpendicular crossings of small tributaries (Volume 65, Federal Register [FR], pages 128888, 12889, May 9, 2000), consideration should be given to the*

use of Nationwide Permit #14 (linear transportation crossings) or General Permit #198200031. If the USACOE deems the use of nationwide or general permitting inappropriate, an Individual Section 404 permit would be required.”

In the final analysis, the U.S. Army Corps of Engineers will dictate what permits will be used, and NWP #14 may be considered as part of this evaluation. In their comments, they indicated that at this time they believe an Individual Permit will be required. The above text was revised in the FEIS to reflect this position.

Comment: “R) On page 4-111, Section 4.15.1-4.15.4, all anticipated impacts from utility relocations should be included as part of the overall project impacts for each alternative.”

Response: *Utility relocations are expected to be confined to the planned right-of-way, as designated in the design plans, and are taken into account in the impacts presented in the DEIS and FEIS. No substantial additional impacts are expected.*

Comment: “S) On page 4-114, the document indicates that the existing development trends will not be affected by congestion because the areas where development is occurring do not use US 321 for access to Blowing Rock and associated amenities. Assuming this assertion is accurate, doesn't it potentially argue against the need for the project at all? Please review this analysis and modify as appropriate.”

Response: *The assertion is correct. Existing development trends are expected to continue whether or not US 321 is improved. If US 321 is not improved, the traffic generated by existing and planned development and tourism in the region will result in congestion on US 321. If US 321 is improved, the traffic generated in the region by existing and planned development and tourism will not result in congestion on US 321. The need for the project is not solely to support development within Blowing Rock.*

Comment: “T) While the discussion on potential secondary and cumulative impacts from the project is good, additional information about the various water quality programs that are associated with the water body classifications should be added. As an example, several impacted streams are classified as Trout Waters. These waters have a set of protections associated with the Trout Waters classification. A listing of those protections and how they work to protect water quality is necessary as part of the discussion for the 401 Water Quality Certification. In addition, given the presence of waters classified as Trout Waters and based on our internal policy regarding the type of analysis required for each project, a quantitative assessment of the anticipated secondary and cumulative impacts from the project will be required as part of the 401 Water Quality Certification application. The discussions required for the issuance of the 401 Water Quality Certification could easily be included at this stage of the environmental document development.”

Response: *A quantitative assessment of the anticipated secondary and cumulative impacts will be completed prior to issuance of the 401 Water Quality Certification permit.*

Comment: “U) The impacts associated with borrow and waste sites is a product of the road project and the responsibility of the NCDOT. As such, all the anticipated impacts resultant from the location and use of borrow and waste sites needs to be included in the 401 Water Quality Certification.”

Response: *The concern is noted and will be discussed further during the Section 404 permit application process. This impact is discussed in Section 4.17.6 in Chapter 4 of the DEIS and Section 4.16.5 in Chapter 4 of the FEIS. This section indicates that the earthwork can be balanced with the Widening (Preferred) Alternative and thus no need for borrow and waste sites is anticipated.*

Comment: “V) On page 4-145, the document indicates that the construction of Alternative 1A or 1B would prove detrimental to further development in the area. It has been our experience that this statement is inaccurate. We have seen repeated examples of the construction of a new location roadway accelerating development in the adjacent area. However, examples of the converse have not been observed. Please review this statement and provide supporting documentation to validate the assertion.”

Response: *The NCDOT did not recommend Bypass Alternative 1A or 1B as the Preferred Alternative. Bypass Alternative 1A and 1B would not provide road access to the developing areas through which it would pass. Further, the development occurring in the area through which these alternatives would pass and the focus of development in much of Blowing Rock as a whole is vacation homes in a quiet setting. These two alternatives would bring traffic and noise into this quiet setting. Thus, it was concluded that future development of vacation homes in this area would be discouraged and the demand for such homes would be met in other parts of undeveloped Blowing Rock and its environs.*

Comment: “W) On page 8-11, the document indicates that the signed Merger agreements are presented in Appendix B. Neither of the signed agreements is in Appendix B. Please add the signed documents to the document.”

Response: *The concern is noted. Signed Merger Agreements have been included in Appendix F of the FEIS.*

Comment: “X) After the selection of the preferred alternative and prior to an issuance of the 401 Water Quality Certification, the NCDOT is respectfully reminded that they will need to demonstrate the avoidance and minimization of impacts to wetlands (and streams) to the maximum extent practicable. Based on the impacts described in the document, wetland mitigation will be required for this project. Should the impacts to jurisdictional wetlands exceed 1.0 acres, mitigation may be required in accordance with NCDWQ Wetland Rules {15A NCAC 2H.0506 (h)(2)}.”

Response: *The concern is noted and the NCDOT will follow the procedures required by Sections 401 and 404 of the Clean Water Act. The anticipated wetland impacts of the Preferred Alternatives evaluated in the FEIS is less than one-tenth of an acre. On April 20, 2004, the Merger Team, including the Division of Water Quality, agreed that the Widening (Preferred) Alternative’s alignment does avoid and minimize impacts to water resources to the extent practicable (concurrence point 4a). (See Appendix F and Section 7.10.2.)*

Comment: “Y) In accordance with the NCDWQ Wetlands Rules {15A NCAC 2H.0506(b)(6)}, mitigation will be required for impacts of greater than 150 linear feet to any single perennial stream. In the event that mitigation is required, the mitigation plan should be designed to replace appropriate lost functions and values. In accordance with the NCDWQ Wetlands Rules {15A

NCAC 2H.0506 (h)(3)}, the Wetland Restoration Program may be available for use as stream mitigation.”

Response: *The concern is noted. It is anticipated that any required off-site mitigation would be handled through the Ecosystem Enhancement Program (EEP).*

Comment: “Z) Where streams must be crossed, the DWQ prefers bridges be used in lieu of culverts. However, we realize that economic considerations often require the use of culverts. Please be advised that culverts should be countersunk to allow unimpeded passage by fish and other aquatic organisms. Moreover, in areas where high quality wetlands or streams are impacted, a bridge may prove preferable. When applicable, DOT should not install the bridge bents in the creek, to the maximum extent practicable.”

Response: *Culverts would be countersunk. The question of the appropriateness of bridges or culverts was addressed by the NEPA/Section 404 Merger Team on April 20, 2004. The Division of Water Quality concurred on this date with the proposed use of bridges versus culverts with the Widening (Preferred) Alternative (Concurrence Point 2a). (See Appendix F and Section 7.10.2.)*

Comment: “AA) Sediment and erosion control measures should not be placed in wetlands.”

Response: *Sediment and erosion control measures will not be placed in wetlands.*

Comment: “BB) Borrow/waste areas should avoid wetlands to the maximum extent practicable. Impacts to wetlands in borrow/waste areas could precipitate compensatory mitigation.”

Response: *Borrow/waste areas will avoid wetlands to the maximum extent practicable. Borrow/waste areas are discussed in Section 4.17.6 in Chapter 4 of the DEIS and Section 4.16.5 in Chapter 4 of the FEIS. This section indicates that the earthwork can be balanced with the Widening (Preferred) Alternative and thus no need for borrow and waste sites is anticipated.*

Comment: “CC) The 401 Water Quality Certification application will need to specifically address the proposed methods for stormwater management. More specifically, stormwater should not be permitted to discharge directly into the creek. Instead, stormwater should be designed to drain to a properly designed stormwater detention facility/apparatus.”

Response: *The concern is noted. Stormwater issues would be discussed during final design, continued Merger Team coordination (Concurrence Points 4b and 4c), and during the Section 404/401 permit process.*

Comment: “DD) There should be a discussion on mitigation plans for unavoidable impacts. If mitigation is required, it is preferable to present a conceptual (if not finalized) mitigation plan with the environmental documentation. While the NCDWQ realizes that this may not always be practical, it should be noted that for projects requiring mitigation, appropriate mitigation plans will be required in conjunction with the issuance of a 401 Water Quality Certification.”

Response: *Section 4.9.3 in Chapter 4 of the FEIS discusses the permitting and mitigation section of the document. As stated, a mitigation site search was conducted during the project fieldwork. The location of these sites and potential mitigation measures are*

listed. More detail concerning potential mitigation will be generated during final design, and discussed with the Merger Team during Concurrence Point 4b and 4c meetings.

Comment: “EE) Future documentation should include an itemized listing of the proposed wetland and stream impacts with corresponding mapping.”

Response: Table 4-23 to Table 4-28 in Chapter 4 of the DEIS and Table 4-25 to Table 4-30 in Chapter 4 of the FEIS provide an itemized listing of wetland and stream impacts. Jurisdictional area numbers were added to the design drawings in the FEIS Appendix D.

Comment: “FF) Based on the information presented in the document, the magnitude of impacts to wetlands and streams will require an Individual Permit application to the Corps of Engineers and corresponding 401 Water Quality Certification. Please be advised that a 401 Water Quality Certification requires satisfactory protection of water quality to ensure that water quality standards are met and no wetland or stream uses are lost. Final permit authorization will require the submittal of a formal application by the NCDOT and written concurrence from the NCDWQ. Please be aware that any approval will be contingent on appropriate avoidance and minimization of wetland and stream impacts to the maximum extent practicable, the development of an acceptable stormwater management plan, and the inclusion of appropriate mitigation plans where appropriate.”

Response: The USACE will dictate whether an Individual Permit will be required. NCDOT will provide necessary information to support whatever permits are required. In their comments, the USACE indicated that at this time they also believe an Individual Permit would be required.

Department of Environmental and Natural Resources – Winston Salem Regional Office

Comment: “Any open burning associated with subject proposal must be in compliance with 15 A NCAC 12D.1900. Demolition or renovations of structures containing asbestos material must be in compliance with 15 A NCAC 2D.1110 (a) (1) which requires notification and removal prior to demolition. The Sedimentation Pollution Control Act of 1973 must be properly addressed for any land disturbing activity. An erosion and sedimentation control plan will be required if one or more acres [is] to be disturbed. [A plan [must be] filed with proper Regional Office (Land Quality Section) at least 30 days before beginning activity. A fee of \$40 for the first acre or any part of an acre. Abandonment of any wells, if required must be in accordance with Title 15A.Subchapter 2C.0100. Notification of the proper regional office is requested if “orphan” underground storage tanks (USTS) are discovered during any excavation operation.”

Response: The position is noted. NCDOT will secure necessary permits from the DENR in accordance with state law.

North Carolina Wildlife Resources Commission

Comment: “NCWRC has provided comments on this project at various stages in the past. Copies of two previous project reviews by NCWRC are in Appendix A of the document [DEIS], the most recent dated February 15, 2000. These comments remain appropriate to the project and NCWRC continues to support the widening of existing US 321 Alternative.”

Response: The position is noted.

7.9.3 Regional and Local

Appalachian Regional Commission

Comment: "The proposed project will not have any adverse effect on the Appalachian Development Highway System."

Response: *No response required.*

Caldwell Community College and Technical Institute

Comment: "The Board of Trustees, at it's [sic] regularly scheduled meeting on September 19, 2002, instructed me to convey on their behalf a recommendation with regard to the safe travel of faculty, staff and students between the campus in Caldwell County and Watauga County. The Highway 321 project will have an impact on the aforementioned groups of individuals. As such, it is our recommendation that the North Carolina Department of Transportation consider for the project the safest, most cost-efficient route that would be the least disruptive to the environment. We endorse the widening of Highway 321 in place."

Response: *The position of the Caldwell Community College and Technical Institute is noted.*

County of Caldwell

Comment: "After many years and many words from many people concerning the widening of 321 through Caldwell County and Watauga County into a four-lane thoroughfare, I will be as succinct as possible in expressing Caldwell County Board of Commissioners "opinion" concerning same.

We believe and support the improvement of [US] 321:

- By the most cost effective route
- As expeditiously as possible
- With the least environmental impact to the County's topography
- We also believe that nothing on this earth can be done that will make everybody happy but we do believe that more people will appreciate the road improvement than not. As County Commissioners we have completed a lot of projects by giving the most weight to the most people and not to the few. We have been driven by the greater good in all that we have done and we ask that you and the Department of Transportation do the same."

Response: *The position of the County of Caldwell is noted.*

Town of Blowing Rock

Comment: Unfavorable Response. Resolution submitted opposing all build alternatives.

Response: *The position of the Town of Blowing Rock is noted.*

Town of Boone

Comment: The DEIS received a favorable rating (meaning the project is in agreement with the goals and objectives of the Town's programs) from the Town of Boone (via Greg Young Boone Town Manager). It was noted that the project is listed in the Watauga County Thoroughfare Plan.

Response: No response needed.

Watauga County Board of Commissioners

Comment: No comment. A copy of the Watauga County Thoroughfare Plan was submitted as an attachment.

Response: No response needed.

7.10 NCDOT Post Hearing NEPA/404 Merger Team Meetings

7.10.1 NEPA/404 Concurrence Point 3 Merger Meeting

The NEPA/404 Concurrence Point 3 Merger Meeting was held January 15, 2003. Representatives from the following agencies were in attendance:

- North Carolina Department of Transportation;
- US Army Corps of Engineers;
- North Carolina Division of Water Quality;
- North Carolina State Historic Preservation Officer;
- North Carolina Wildlife Resources Commission
- US Environmental Protection Agency;
- US Fish and Wildlife Service; and
- National Park Service, Blue Ridge Parkway;

The purpose of this meeting was to reach concurrence from Merger Team members for the selection of a Least Environmentally Damaging Practicable Alternative (LEDPA) for the US 321 Improvements Project in Blowing Rock. The NCDOT recommended the Widening Alternative to the Merger Team as the LEDPA.

Three key considerations were identified that guided the NCDOT's opinion regarding the LEDPA:

1. If the Green Park Historic District were not affected, the Widening Alternative would clearly be the least environmentally damaging alternative.
2. The magnitude of the impact to the Green Park Inn Historic District by the Widening Alternative is not enough to outweigh the resulting negative community and environmental impacts of either Bypass Alternative 1 design or either Bypass Alternative 4 design.
3. Mitigation opportunities exist with the Widening Alternative. Landscaping, revegetation, replacement and installation of new rock walls, and burying utilities are examples of initiatives to compensate for impacts to the Town of Blowing Rock. However, it would be extremely difficult to mitigate the damage to the natural environment, the surrounding hillside, and the local neighborhoods by a bypass alternative.

All Merger Team Agencies signed the Concurrence Point 3 form selecting the Widening Alternative as the LEDPA with the exception of the State Historic Preservation Officer's (SHPO) representative. The SHPO's representative could not concur because of the impacts of the Widening Alternative upon historic properties; however, the SHPO's representative stated that

the agency was willing to proceed with Section 106 mitigation discussions. The signed concurrence form is included in Appendix F.

7.10.2 Concurrence Point 4A and 2A Meeting

The NEPA/404 Concurrence Point 4A and 2A Merger Meeting was held on April 20, 2004

Representatives from the following agencies were in attendance:

- North Carolina Department of Transportation;
- US Army Corps of Engineers;
- North Carolina Division of Water Quality;
- North Carolina State Historic Preservation Officer;
- North Carolina Wildlife Resources Commission;
- US Environmental Protection Agency;
- US Fish and Wildlife Service; and
- National Park Service, Blue Ridge Parkway

The purpose of this meeting was to receive concurrence from Merger Team members for Avoidance and Minimization efforts regarding streams and wetlands for the design of the Widening (Preferred) Alternative (Concurrence Point 4a) and bridge locations and lengths (Concurrence Point 2a). The team evaluated NCDOT's mitigation efforts. Notable comments included:

- Stream system 1 (see Figure 3-9 in Chapter 3) would need a retaining wall in excess of 90 feet high to avoid the impact;
- Shifting the alignment away from the stream system 2 stream and wetland would create substantial impacts on the opposite side of the road (including seven additional residential relocations, one of which is a contributing structure to the Green Park Historic District) and potentially unbalance the cut (excavation) and fill estimates; and
- The design characteristics of the proposed structure (a box culvert) at stream system 4 will remain unchanged, however the DWQ indicated that seals and baffles would be evaluated at permitting.

All Merger Team members signed the Concurrence Point 4A and 2A Agreement

7.11 Blowing Rock Town Council Mitigation Meetings

Four meetings were held by the NCDOT with the Blowing Rock Town Council at the Blowing Rock Town Hall to discuss impact and mitigation issues with the purpose of developing an agreement on a mitigation strategy. These meetings and associated exchanges of information between the NCDOT and the Town resulted in the Memorandum of Understanding adopted by both the Town Council and the NCDOT Board of Transportation. This agreement is presented in Appendix G. The following sections briefly describe the primary points of discussion at the four meetings.

7.11.1 May 16, 2003 Meeting

Key issues desires noted by the Town Council at this initial mitigation meeting were:

1. To build a road that looks like a parkway; and
2. To maintain traffic flow during construction, as well as minimize and mitigate construction impacts.

The Council also indicated that they wanted additional time to refine their mitigation objectives. The NCDOT informed the Board that the NCDOT has a context sensitive solution team that would evaluate issues related to mitigation. The Town Council decided not to appoint a subcommittee to work with NCDOT, but to meet with the NCDOT as a body. In terms of the construction period, the Council was interested in when construction would occur and how much of an impact it would have on the operational use of the road. The Town Council also requested a project timeline and indicated that the Town also needs to work with the NCDOT regarding relocation of water and sewer lines. The NCDOT said that the goal of meeting with the Town Council was the development of a formal agreement (e.g. Memorandum of Understanding) between the Town and the NCDOT presenting mitigation strategies.

7.11.2 June 12, 2003 Meeting

This meeting focused on an item-by-item review of a “Town of Blowing Rock Town Council Goals and Issues” list and a “Road Sections” assessment sheet prepared by the Town. The NCDOT agreed to provide responses to the Board’s goals in terms of their feasibility.

7.11.3 July 10, 2003 Meeting

The discussion during this meeting included decorative coach light specifications, an emergency signal request at a planned fire station, the potential closure of Goforth Road at its intersection with US 321, coordination of the signal at Food Lion and the next signal to the north (US 221), traffic movement for the planned Blowing Rock Arts Center, and traffic calming with landscaping. The NCDOT agreed to provide drawings to the Town of Blowing Rock showing potential areas for broader landscaping, sidewalk locations, guard rail locations, and other planting locations. Potential components of a landscape design were discussed including the location of sidewalks.

7.11.4 October 7, 2003 Meeting

The meeting was held at the Blowing Rock Town Hall. The NCDOT presented a rough design sketch that showed potential locations for wider berms (flat areas adjacent to the road curb) at various locations along the corridor that could provide additional streetscaping opportunities. The focus of the drawings was primarily on the area south of the US 321/US 321 Business intersection and around the Sunset Drive area. Traffic maps annotated with current signs along US 321 were provided to the Council because of a previously indicated interest by the Council in reducing “sign clutter.”

The possible configuration of an intersection at the Food Lion shopping center was discussed. While the public hearing map shows a median opening at the Food Lion, the NCDOT’s preference is to provide no median opening, or at least to restrict left-turns out of the Food Lion parking lot (i.e., provide a leftover). It was noted that without a full-movement median opening

at that location, the need for a signal there would be eliminated. It was noted that a coordinated signal system would be included in the project.

Pedestrian issues were discussed. Sidewalks will be included in the project. The NCDOT noted that pedestrian crossings work best when they are part of a larger integrated transportation plan (i.e., bicycle/pedestrian master plan). The Town indicated that they did not have any approved long-term pedestrian plans; however, there is a plan to extend and rehabilitate existing sidewalk south of downtown on US 321 Business to US 321.

Other issues discussed were:

- Emergency access across the median at a planned new fire station on US 321 and appropriate mechanisms for warning travelers that a fire truck is leaving the station;
- That the NCDOT is conducting a new signal warrant study for the Country Club Drive intersection with US 321; and
- Issue related to closing the Goforth Road intersection with US 321.

It was agreed that enough discussion had occurred for that point in time and that the NCDOT would seek out answers to unanswered questions and draft a Memorandum of Understanding accordingly. The Town would review the draft, and it would undergo iterations of revisions until both parties were satisfied. Should another meeting prove necessary to discuss further the items in the MOU, it would be scheduled. The MOU in Appendix G is this resulting agreement, and it reflects the conclusions of these discussions and reviews and documents the agreement of both parties.

7.12 Section 106 Consulting Party Meetings

A series of meetings were held with individuals, an organization, and an ad hoc group of citizens to discuss the mitigation of impacts to the Green Park Historic District and the Green Park Inn associated with the Preferred Alternative. These meetings were part of the process for developing a Memorandum of Agreement between the NCDOT, the SHPO, and the USACE, as required by Section 106 of the Historic Preservation Act when a planned federal action would have an adverse effect on historic resources listed on or eligible for listing on the National Register of Historic Places. In this case, the federal action is the issuance of a permit by the USACE for impacts to jurisdictional water resources within the Green Park Historic District during construction of the Preferred Alternative. The Memorandum of Agreement is presented in Appendix G.

7.12.1 June 24, 2003 A.G. Jonas Cottage Meeting

This meeting was held at the David and Linda Laughter home (A.G. Jonas Cottage), a contributing structure to the Green Park Historic District. The NCDOT, SHPO, and USACE attended. The Laughters suggested that the alignment of the Preferred Alternative be shifted closer to the Blowing Rock County Club golf course to reduce noise and visual impact at their home. Relocation of the home to the north and west was also discussed. The NCDOT agreed to and subsequently did examine the impact of moving US 321 away from the Laughters' property, the merits of a noise barrier, and acquisition of the Laughter home. Ultimately, the NCDOT decided to provide a fence with noise reduction characteristics approximately 12 feet high along the property line blocking US 321 and its widened pavement from view (see Figure D-1e). A

retaining wall was placed at the cottage instead of a cut slope to reduce the amount of new right-of-way required for the widened road. Eleven-foot lanes would pass through the historic district instead of 12-foot lanes. All other options were too costly, impractical, or in conflict with laws or NCDOT policies.

7.12.2 June 24, 2003 Blowing Rock Country Club Meeting

This meeting was held at the Blowing Rock Country Club with the Board of Directors. The NCDOT, SHPO, and USACE attended. The Country Club requested that of the NCDOT abandon Goforth Road between US 321 and Galax Lane and that a left turn lane be placed on US 321 at Country Club Drive. NCDOT agreed to closing Goforth Road and to conduct an intersection analysis for a possible left turn lane on US 321 at Country Club Drive. The NCDOT added a left turn lane at County Club Drive to the Preferred Alternative. The Country Club was also concerned about the drainage from US 321 onto holes four and five on the golf course. NCDOT agreed to consider the golf course's concerns in developing the hydraulic design during final design.

7.12.3 June 25, 2003 Hayes Meeting

The meeting was held at the residence of Ms. Miriam Hayes. Ms. Virginia Stevens (a Blowing Rock resident active in historic preservation in Blowing Rock), the NCDOT, SHPO, and USACE attended. Concern discussed at the meeting included: air quality and noise levels, not incorporating a median in front of the Green Park Inn, keeping US 321 open during construction, the impacts of blasting on local residents, narrowing lanes from 12 feet to 11 feet wide, putting guard rail between the curb and gutter, preservation of the blueberry bushes near US 321, tractor trailer brake noise, and use stone walls. The NCDOT said they would keep the road open during construction except during blasting, update the mapping to ensure all structures are counted when planning how to minimize disturbances associated with blasting, and relocate or replace the blueberry bushes if they are in the right of way of the Preferred Alternative. The median in front of the Green Park Inn was ultimately eliminated from the design.

7.12.4 June 25, 2003 Green Park Inn Meeting

The meeting was held with at the Green Park Inn with the manager of the Inn. NCDOT, SHPO, and USACE representatives attended. The NCDOT and SHPO representatives described potential mitigation opportunities for the Inn. The manager said:

- The Inn was not against abandoning Goforth Road as long as the fourth hole green of the Blowing Rock Country Club's golf course does not move any closer to the Inn;
- Patron access to the Inn must be maintained during construction;
- He liked the idea of a median in front of the Inn because the current road is unattractive and a median would soften the view;
- The Inn has an informal agreement with the owner to park on the gravel area across from the Inn but no longer owns the property;

-
- He wants project related impacts on the Inn minimized where possible; and
 - Construction management that will minimize construction impacts is a key issue for the Inn.

Alternatives for funding improvements to the Inn as a mitigation strategy also were discussed and the NCDOT asked the manager to provide a current list of planned improvements and estimated costs for informational purposes.

7.12.5 July 25, 2003 Meeting with the Owner of the Green Park Inn

Representatives of the NCDOT and the SHPO met with the owner of the Green Park Inn at the SHPO's offices in Raleigh, North Carolina. Potential mitigation opportunities for the Inn were discussed, including potential funding sources for improvements to the Inn. Impact mitigation at the Inn is reflected in the Memorandum of Agreement presented in Appendix G. The owner of the Inn signed the agreement as a concurring party.

7.12.6 July 31, 2003 Section 106 Consulting Parties Open House

The open house was held at the Green Park Inn. The purpose was to provide a forum for anyone with a stake in mitigation of impacts to the Green Park Historic District to come and discuss the project, their concerns, and ideas with the study team. NCDOT, SHPO, and USACE representatives attended. Approximately 40 interested stakeholders attended the meeting. Comments and questions were generally focused on construction traffic impacts, noise, blasting, and neighborhood issues (pedestrian access and landscaping).

7.12.7 October 29, 2003 Small Group Meeting

This meeting was at the American Legion Hall in Blowing Rock with an ad hoc group of property owners in the Green Park Historic District. Representatives from the NCDOT, the SHPO, the USACE, the Town of Blowing Rock, attended. Representatives of the National Trust for Historic preservation attended via telephone. The group expressed the following generalized concerns:

- Potential harm to businesses and residences during the construction process;
- Road design (speed, noise, etc.); and
- Neighborhood issues (pedestrian access, landscaping, etc.).

NCDOT was provided a written summary of the group's concerns. NCDOT agreed to follow up with the group and provide an individual response to each question. The follow-up responses were sent to the group on August 4, 2004.

7.12.8 August 6, 2004 Small Group Meeting

A second meeting with the ad hoc group of property owners from the Green Park Historic District was held at the Gideon Ridge Inn in Blowing Rock. Representatives from NCDOT, the SHPO, and the USACE attended. NCDOT and SHPO representatives addressed specific questions from the group and discussed progress on the Memorandum of Agreement, the projected date for approval, and the roles and responsibilities of MOA concurring parties.

7.13 October 3, 2003 Meeting with The Pines

Representatives of the NCDOT met with representatives of The Pines subdivision, which is east of US 321 and north of Norwood Circle. They asked that their gated emergency vehicle access point on US 321 be retained. Without it, fire trucks cannot reach all of the homes in the subdivision. The NCDOT agreed it would be maintained with the Preferred Alternative. This commitment is included in the Memorandum of Understanding with the Town of Blowing Rock (Appendix G).