

APPENDIX C

COMMENTS ON THE FINAL EIS

ORGANIZATION OF APPENDIX C

- C1. Agency Comments**
- C2. Citizen Comments**
- C3. Local Government/Agency Resolutions**
- C4. Public Comment Forms from GUAMPO Meeting**

ORGANIZATION OF APPENDIX C

During the public review period for the Final EIS, comments were received from agencies, local governments, interest groups, and the public via letters, emails, and comment forms. For tracking purposes, each document was assigned a unique document number.

- C1. Agency Comments (Document Numbers a001-a008)
- C2. Citizen Comments (Document Numbers p001-p026)
- C3. Local Government/Agency Resolutions (Document Numbers g001-g011)
- C4. Comment Forms received at a GUAMPO LRTP meeting held February 7, 2011 (Document Numbers c001-c054)

Although this meeting was hosted by GUAMPO to discuss their long range transportation plans and was not specifically about the Gaston East-West Connector (Garden Parkway), many attendees came to ask questions about the Garden Parkway and provided comments regarding the Garden Parkway on the comment forms provided. Therefore, the comment forms received during the meeting that include comments about the Garden Parkway are included in this Record of Decision.

Scanned copies of the original documents received are included in this appendix, with the assigned document number placed in the upper right corner of the letters, emails, resolutions, and comment forms. A table of contents is provided at the beginning of each appendix section that lists the documents included in that appendix section.

Each document was reviewed and considered, and comments responded to are bracketed and numbered in the scanned documents. Not all statements made in the documents require a response.

For documents in **Appendices C1 and C2**, a table of responses to bracketed comments immediately follows each individual document. In **Appendix C4**, a single table including responses to comments is included after the comment forms. The resolutions contained in **Appendix C3** do not require responses.

APPENDIX C1

AGENCY COMMENTS

Document Number	Agency	Date	Page Number
a001	NC Department of Administration – State Environmental Review Clearinghouse	02/22/11	C1-1
a002	NC Department of Environment and Natural Resources	02/21/11	C1-3
a003	NC DENR Division of Water Quality	02/21/11	C1-5
a004	NC Wildlife Resources Commission	02/14/11	C1-17
a005	NC DENR Office of Conservation, Planning, & Community Affairs – Natural Heritage Program	02/08/11	C1-20
a006	NC Department of Cultural Resources State Historic Preservation Office	02/09/11	C1-26
a007	NC Department of Environment and Natural Resources – Division of Environmental Health	01/28/11	C1-28
a008	US Environmental Protection Agency Region 4 Atlanta	02/22/11	C1-30



a001

North Carolina
Department of Administration

Beverly Eaves Perdue, Governor

February 22, 2011

Moses Carey, Jr., Secretary

Mr. Steve DeWitt
N.C. Turnpike Authority
1578 Mail Service Center
Raleigh, NC 27611

Dear Mr. DeWitt:

Re: SCH File # 11-E-4220-0166; FEIS; Gaston East-West Corridor: Improvements to east-west transportation mobility in the area around Gastonia and other towns in southern Gaston and western Mecklenburg counties; TIP U-3321

The above referenced environmental impact information has been submitted to the State Clearinghouse under the provisions of the National Environmental Policy Act. According to G.S. 113A-10, when a state agency is required to prepare an environmental document under the provisions of federal law, the environmental document meets the provisions of the State Environmental Policy Act. Attached to this letter for your consideration are the comments made by agencies in the course of this review.

If any further environmental review documents are prepared for this project, they should be forwarded to this office for intergovernmental review.

Should you have any questions, please do not hesitate to call.

Sincerely,

Sheila Green
State Environmental Review Clearinghouse

Attachments

cc: Region F

Mailing Address:
1301 Mail Service Center
Raleigh, NC 27609-1301

Telephone: (919)807-2425
Fax: (919)733-9571
State Courier #51-01-00
e-mail: state_clearinghouse@doa.nc.gov

Location Address:
116 West Jones Street
Raleigh, North Carolina

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Appendix C1 – Agency Comments

Table C1-1: NC Department of Administration - State Environmental Review Clearinghouse

Document: a001 letter dated Feb 22, 2011

COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
N/A	Comment Noted	No comments.	No response required.



a002

North Carolina Department of Environment and Natural Resources

Beverly Eaves Perdue
Governor

Dee Freeman
Secretary

MEMORANDUM

TO: Sheila Green
State Clearinghouse

FROM: Melba McGee
Environmental Review

RE: 11-0166 FEIS for the Proposed Gaston East-West Connector from I-85 West of Gastonia to I-485 near the Charlotte-Douglas International Airport, Gaston and Mecklenburg Counties

DATE: February 21, 2011

1 [The Department of Environment and Natural Resources has reviewed the subject proposal. The attached comments from our divisions identify several items that need to be expanded upon or clarified. Additional efforts should also be made in minimizing direct, secondary and cumulative impacts.

2 [At this point, the applicant is encouraged to work directly with our resources agencies in addressing their concerns prior to finalizing project plans. Addressing these comments during the review process and/or during the NEPA Merger Process will avoid delays during the permit phase.

Thanks you for the opportunity to respond.

Attachments

Appendix C1 – Agency Comments

Table C1-2: North Carolina Department of Environment and Natural Resources (NCDENR)

Document: a002 letter dated Feb 21, 2011

COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
1	Indirect and Cumulative Effects	The Department of Environment and Natural Resources has reviewed the subject proposal. The attached comments from our divisions identify several items that need to be expanded upon or clarified. Additional efforts should also be made in minimizing direct, secondary and cumulative impacts.	NCTA has been working with environmental resource and regulatory agencies through the NEPA/404 Merger process (Final Environmental Impact Statement [Final EIS] Section 3.2), and will continue to coordinate with them during the final design and permitting process.
2	Agency Coordination	At this point, the applicant is encouraged to work directly with our resources agencies in addressing their concerns prior to finalizing project plans. Addressing these comments during the review process and/or during the NEPA Merger Process will avoid delays during the permit phase.	See response to Comment 1 in this letter (letter a002).



North Carolina Department of Environment and Natural Resources
Division of Water Quality

Beverly Eaves Perdue
Governor

Coleen H. Sullins
Director

Dee Freeman
Secretary

a003

February 21, 2011

MEMORANDUM

To: Melba McGee, Environmental Coordinator, Office of Legislative and Intergovernmental Affairs

From: Polly Lespinasse, Division of Water Quality, Mooresville Regional Office

Subject: Comments on the Final Environmental Impact Statement Related to the Proposed Gaston East-West Connector from near I-85 to I-485 and NC 160 in Gaston and Mecklenburg Counties, Federal Aid Project No. STP-1213(6), WBS Element 34922.1.TA.1, STIP Project Number U-3321, DENR Project No. 11-0166, Due Date 02/09/2011

This office has reviewed the referenced document dated December 2010. The NC Division of Water Quality (NCDWQ) is responsible for the issuance of the Section 401 Water Quality Certification for activities that impact Waters of the U.S., including wetlands. It is our understanding that the project as presented will result in impacts to jurisdictional wetlands, streams, and other surface waters. NCDWQ offers the following comments based on review of the aforementioned document.

Project Specific Comments:

- 1. Many of the streams within the project study area are on the Final 2010 303(d) list (impaired waters). Included in the Final 2010 303(d) list is the South Fork Catawba River, which is listed for turbidity (Note: Chapter 2, Page 72 indicates that the South Fork Catawba River is impaired for copper and high temperatures). This project proposes a bridge over the South Fork Catawba River which may impact water quality during construction. NCDWQ is very concerned with sediment and erosion impacts that could result from this project. NCDWQ will require the most protective sediment and erosion control BMPs be implemented in accordance with *Design Standards in Sensitive Watersheds* to reduce the risk of sediment runoff to the South Fork Catawba River. NCDWQ requests that road design plans provide treatment of the storm water runoff through best management practices as detailed in the most recent version of *NCDWQ Stormwater Best Management Practices*.
- 2. This project is located within the Catawba River Basin. Riparian buffer impacts shall be avoided and minimized to the greatest extent possible, pursuant to 15A NCAC 2B.0243. New development activities located in the protected 50-foot wide riparian areas within the basin shall be limited to "uses" identified within and constructed in accordance with 15A NCAC 2B.0243. The FEIS does not contain an impact table for buffer impacts, but referenced a table included in the DEIS. Based on the DEIS, impacts to protected riparian buffers are proposed on the east side of the Catawba River and potentially to both sides of the South Fork Catawba River. No impacts to the riparian buffer are identified for Catawba Creek per the DEIS. The table in the DEIS does not provide specific locations (or mapping information) for impacts associated with the preferred alternative (DSA 9). The NCTA is advised that while the construction of bridges through riparian buffers does not require mitigation, impacts for the roadway approaches to the bridge will require mitigation, if the impact amounts exceed the "allowable without mitigation" threshold (per DWQ Buffer Clarification memo dated 09/27/10). As part of the permit application, NCTA must provide mapping and tables clearly depicting buffer impacts.

Mooresville Regional Office
Location: 610 East Center Ave., Suite 301 Mooresville, NC 28115
Phone: (704) 663-1699 | Fax: (704) 663-6040 | Customer Services: 1-877-423-6748
Internet: <http://portal.ncdenr.gov/web/wq>

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Page Two

a003

- 2. Buffer mitigation may be required for buffer impacts resulting from activities classified as "allowable with mitigation" within the "Table of Uses" section of the Buffer Rules or require a variance under the Buffer Rules. A buffer mitigation plan, including use of the NC Ecosystem Enhancement Program, must be provided to NCDWQ prior to approval of the Water Quality Certification.
- 3. While NCDWQ appreciates the continued reduction in proposed stream and wetland impacts for this project (25% reduction in stream impacts and 6% reduction in wetland impacts) based on design refinements, we remain concerned about the proposed mitigation for these impacts. The "Conceptual Mitigation Plan" provided on the website provides a summary of mitigation requirements and potential on and off site mitigation opportunities. As stated in previous meetings, NCDWQ would prefer that mitigation be provided within close proximity to the preferred alternative to replace the functions lost as a result of direct impacts from the project. This includes providing on site mitigation and limiting, to the greatest extent possible, off site mitigation to areas located within close proximity to the preferred alternative. Due to the difficulty in providing stream mitigation in urban areas, NCDWQ is willing to consider non-traditional mitigation opportunities. Section 6.5 and Table 8 of the "Conceptual Mitigation Plan" identify non-traditional mitigation opportunities that appear to include the maintenance of existing stormwater BMPs. Please be aware that NCDWQ will not provide mitigation credit for any stormwater improvements related to maintenance of existing stormwater BMPs. Additionally, any proposed non-traditional mitigation will need to compare the benefits of providing stormwater BMPs with the benefits of stream restoration (i.e., providing BMPs which result in a reduction of sediment and nutrient loads comparable to streambank stabilization and riparian buffer establishment).
- 4. Chapter 2, Page 64 of the FEIS states that interviews were conducted with the MPOs and County Planning Departments to determine whether the updated 2035 forecasts should serve as the "No Build Scenario" or the "Build Scenario" for ICE Study Area. Based on these interviews, the "Gaston East-West Connector was assumed to be completed in the allocation of future growth to specific zones". NCDWQ is unclear whether this means the road was considered to be completed in the "No Build Scenario". Table 2-17 provides the "Estimated Change in Impervious Cover by Watershed" using baseline data from 2007 and the 2035 "No-Build" and 2035 "Build" Scenarios. Very little change in impervious cover from "No-Build" to "Build" is 0.5%, with some watersheds showing no increase in impervious cover and some showing a decrease in impervious cover. This information may support the fact that the Gaston East-West Connector was included in the "No-Build" Scenario. If the Gaston East-West Connector was included in the "No-Build" Scenario, NCDWQ is concerned that this does not provide an accurate evaluation of the indirect and cumulative impacts associated with this project. If the Gaston East-West Connector was included in the models used to generate data for the "No-Build" Scenario, the NCTA will be required to provide modeling data that does not include the completion of the Gaston East-West Connector as part of the "No-Build" Scenario.
- 5. As stated in Chapter 2, Page 75, NCDWQ will require additional modeling of pollutant loadings in for this project. As indicated above, the NCTA will be required to provide modeling data that clearly identifies whether the completion of the Gaston East-West Connector is included in any "No-Build" Scenarios. Additionally, the ICE study shows that the potential for indirect land use effects is greatest in southern Gaston County and York County (in South Carolina). In NCDWQ's comments on the DEIS, we expressed concerns regarding the effects of stormwater runoff associated with the construction of this project. Local ordinances may not be adequate to address the water quality impacts resulting from this project.
- 6. Chapter 2, Page 79, states that the "land use forecasting results are consistent with Gaston County's land use plan, but may be inconsistent with York County's plan for rural residential and agricultural uses in the northern portion of the county." While NCDWQ has no jurisdiction over development activities in York County, we are concerned that the project may result in increased impacts which will effect water quality in both North and South Carolina. The FEIS also states that "overall indirect effect of the project for the ICE Study area as a whole is relatively small in comparison to the growth in households (42,200) and employment (33,100) expected between the 2005 and 2035 under the No-Build Scenario. For households, the difference is a 3.6 percent increase from the No-Build Scenario to the Build Scenario. For employment, the projected difference between the No-Build Scenario and the Build Scenario is 0.3 percent." As stated above, if the completion of the Gaston East-West Connector was included in the No-Build Scenario, this could present a skewed interpretation of the data.
- 7. Stormwater discharges which are located within the riparian buffer associated with the Catawba River Basin will require the implementation of the appropriate stormwater management facility in accordance with 15A NCAC 2B.0243.

7 NCDWQ recommends that the NCTA consider additional stormwater facilities in other areas of the project where the Catawba River Basin buffer regulations are not applicable, specifically in areas draining to those jurisdictional resources which occur on the 303(d) impaired waters list. Additionally, based on the results of the water quality modeling, stormwater measures may be required to prevent further degradation of impaired streams.

General Comments:

- 8 8. The environmental document should provide a detailed and itemized presentation of the proposed impacts to wetlands and streams with corresponding mapping. If mitigation is necessary as required by 15A NCAC 2H.0506(h), it is preferable to present a conceptual (if not finalized) mitigation plan with the environmental documentation. Appropriate mitigation plans will be required prior to issuance of a 401 Water Quality Certification.
- 9 9. Environmental impact statement alternatives shall consider design criteria that reduce the impacts to streams and wetlands from storm water runoff. These alternatives shall include road designs that allow for treatment of the storm water runoff through best management practices as detailed in the most recent version of NCDWQ's *Stormwater Best Management Practices Manual*, July 2007, such as grassed swales, buffer areas, preformed scour holes, retention basins, etc.
- 10 10. After the selection of the preferred alternative and prior to an issuance of the 401 Water Quality Certification, the NCTA is respectfully reminded that they will need to demonstrate the avoidance and minimization of impacts to wetlands (and streams) to the maximum extent practical. In accordance with the Environmental Management Commission's Rules (15A NCAC 2H.0506(h)), mitigation will be required for impacts of greater than 1 acre to wetlands. In the event that mitigation is required, the mitigation plan shall be designed to replace appropriate lost functions and values. The NC Ecosystem Enhancement Program may be available for use as wetland mitigation.
- 11 11. In accordance with the Environmental Management Commission's Rules (15A NCAC 2H.0506(h)), mitigation will be required for impacts of greater than 150 linear feet to any single stream. In the event that mitigation is required, the mitigation plan shall be designed to replace appropriate lost functions and values. The NC Ecosystem Enhancement Program may be available for use as stream mitigation.
- 12 12. Future documentation, including the 401 Water Quality Certification Application, shall continue to include an itemized listing of the proposed wetland and stream impacts with corresponding mapping.
- 13 13. NCDWQ is very concerned with sediment and erosion impacts that could result from this project. NCTA shall address these concerns by describing the potential impacts that may occur to the aquatic environments and any mitigating factors that would reduce the impacts.
- 14 14. An analysis of cumulative and secondary impacts anticipated as a result of this project is required. The type and detail of analysis shall conform to the NC Division of Water Quality Policy on the assessment of secondary and cumulative impacts dated April 10, 2004. NCTA is respectfully reminded that all impacts, including but not limited to, bridging, fill, excavation and clearing, and rip rap to jurisdictional wetlands, streams, and riparian buffers need to be included in the final impact calculations. These impacts, in addition to any construction impacts, temporary or otherwise, also need to be included as part of the 401 Water Quality Certification Application.
- 15 15. Where streams must be crossed, NCDWQ 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, NCTA should not install the bridge bents in the creek, to the maximum extent practicable.
- 16 16. Whenever possible, NCDWQ prefers spanning structures. Spanning structures usually do not require work within the stream or grubbing of the streambanks and do not require stream channel realignment. The horizontal and vertical clearances provided by bridges shall allow for human and wildlife passage beneath the structure. Fish passage and navigation by canoeists and boaters shall not be blocked. Bridge supports (bents) should not be placed in the stream when possible.

- 17 13. Bridge deck drains shall not discharge directly into the stream. Stormwater shall be directed across the bridge and pre-treated through site-appropriate means (grassed swales, pre-formed scour holes, vegetated buffers, etc.) before entering the stream. Please refer to the most current version of NCDWQ's *Stormwater Best Management Practices*.
- 18 14. Sediment and erosion control measures should not be placed in wetlands or streams.
- 19 15. Borrow/waste areas should avoid wetlands to the maximum extent practical. Impacts to wetlands in borrow/waste areas will need to be presented in the 401 Water Quality Certification and could precipitate compensatory mitigation.
- 20 16. The 401 Water Quality Certification application will need to specifically address the proposed methods for stormwater management. More specifically, stormwater shall not be permitted to discharge directly into streams or surface waters.
- 21 17. Based on the information presented in the document, the magnitude of impacts to wetlands and streams may require an Individual Permit (IP) 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 NCTA and written concurrence from NCDWQ. Please be aware that any approval will be contingent on appropriate avoidance and minimization of wetland and stream impacts to the maximum extent practical, the development of an acceptable stormwater management plan, and the inclusion of appropriate mitigation plans where appropriate.
- 22 18. If concrete is used during construction, a dry work area shall be maintained to prevent direct contact between curing concrete and stream water. Water that inadvertently contacts uncured concrete shall not be discharged to surface waters due to the potential for elevated pH and possible aquatic life and fish kills.
- 23 19. If temporary access roads or detours are constructed, the site shall be graded to its preconstruction contours and elevations. Disturbed areas shall be seeded or mulched to stabilize the soil and appropriate native woody species shall be planted. When using temporary structures the area shall be cleared but not grubbed. Clearing the area with chain saws, mowers, bush-hogs, or other mechanized equipment and leaving the stumps and root mat intact allows the area to re-vegetate naturally and minimizes soil disturbance.
- 24 20. Placement of culverts and other structures in waters, streams, and wetlands shall be placed below the elevation of the streambed by one foot for all culverts with a diameter greater than 48 inches, and 20 percent of the culvert diameter for culverts having a diameter less than 48 inches, to allow low flow passage of water and aquatic life. Design and placement of culverts and other structures including temporary erosion control measures shall not be conducted in a manner that may result in dis-equilibrium of wetlands or streambeds or banks, adjacent to or upstream and down stream of the above structures. The applicant is required to provide evidence that the equilibrium is being maintained if requested in writing by NCDWQ. If this condition is unable to be met due to bedrock or other limiting features encountered during construction, please contact NCDWQ for guidance on how to proceed and to determine whether or not a permit modification will be required.
- 25 21. If multiple pipes or barrels are required, they shall be designed to mimic natural stream cross section as closely as possible including pipes or barrels at flood plain elevation, floodplain benches, and/or sills may be required where appropriate. Widening the stream channel should be avoided. Stream channel widening at the inlet or outlet end of structures typically decreases water velocity causing sediment deposition that requires increased maintenance and disrupts aquatic life passage.
- 26 22. If foundation test borings are necessary, it shall be noted in the document. Geotechnical work is approved under General 401 Certification Number 3687/Nationwide Permit No. 6 for Survey Activities.
- 27 23. Sediment and erosion control measures sufficient to protect water resources must be implemented and maintained in accordance with the most recent version of North Carolina Sediment and Erosion Control Planning and Design Manual and the most recent version of NCS000250.

- 28 24. All work in or adjacent to stream waters shall be conducted in a dry work area. Approved BMP measures from the most current version of NCDOT Construction and Maintenance Activities manual such as sandbags, rock berms, cofferdams and other diversion structures shall be used to prevent excavation in flowing water.
- 29 25. While the use of National Wetland Inventory (NWI) maps, NC Coastal Region Evaluation of Wetland Significance (NC-CREWS) maps and soil survey maps are useful tools, their inherent inaccuracies require that qualified personnel perform onsite wetland delineations prior to permit approval.
- 30 26. Heavy equipment should be operated from the bank rather than in stream channels in order to minimize sedimentation and reduce the likelihood of introducing other pollutants into streams. This equipment shall be inspected daily and maintained to prevent contamination of surface waters from leaking fuels, lubricants, hydraulic fluids, or other toxic materials.
- 31 27. Riprap shall not be placed in the active thalweg channel or placed in the streambed in a manner that precludes aquatic life passage. Bioengineering boulders or structures should be properly designed, sized and installed.
- 32 28. Riparian vegetation (native trees and shrubs) shall be preserved to the maximum extent possible. Riparian vegetation must be reestablished within the construction limits of the project by the end of the growing season following completion of construction.

NCDWQ appreciates the opportunity to provide comments on your project. Should you have any questions or require any additional information, please contact Polly Lespinasse at (704) 863-1699.

- Cc: Liz Hair, US Army Corps of Engineers, Asheville Field Office (electronic copy only)
Chris Militscher, Environmental Protection Agency (electronic copy only)
Marla Chambers, NC Wildlife Resources Commission (electronic copy only)
Marella Buncick, US Fish and Wildlife Service, (electronic copy only)
Brian Wrenn, NCDWQ Central Office (electronic copy only)
Sonia Carrillo, NCDWQ Central Office (electronic copy only)
File Copy

Appendix C1 – Agency Comments

Table C1-3: NCDENR Division of Water Quality

Document: a003 letter dated Feb 21, 2011

COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
1	Water Resources	<p>Many of the streams within the project study area are on the Final 2010 303(d) list (impaired waters). Included in the Final 2010 303(d) list is the South Fork Catawba River, which is listed for turbidity (Note: Chapter 2, Page 72 indicates that the South Fork Catawba River is impaired for copper and high temperatures). This project proposes a bridge over the South Fork Catawba River which may impact water quality during construction. NCDWQ is very concerned with sediment and erosion impacts that could result from this project. NCDWQ will require the most protective sediment and erosion control BMPs be implemented in accordance with <i>Design Standards in Sensitive Watersheds</i> to reduce the risk of sediment runoff to the South Fork Catawba River. NCDWQ requests that road design plans provide treatment of the storm water runoff through best management practices as detailed in the most recent version of NCDWQ <i>Stormwater Best Management Practices</i>.</p>	<p>The lower South Fork Catawba River watershed portion from a point 0.4 mile upstream of Long Creek to Cramerton Dam and Lake Wylie at Upper Armstrong Bridge is impaired for turbidity (DENR Website: http://portal.ncdenr.org/web/wq/ps/mtu/assessment, Final 2010 303d list, page 27). This area is north of the Preferred Alternative. The Preferred Alternative crosses the South Fork Catawba River where it is an arm of Lake Wylie. In this area, the South Fork Catawba River is noted in the Final 2010 303d list as being impaired for copper and high temperature (Final 303d list page 23).</p> <p>For all project areas, including those in the South Fork Catawba River watershed, NCTA will prepare the erosion and sedimentation control plan and design stormwater treatment in accordance with <i>Design Standards in Sensitive Watersheds</i>. NCTA will coordinate with the permitting agencies to determine appropriate best management practices (BMPs).</p>
2	Water Resources	<p>This project is located within the Catawba River Basin. Riparian buffer impacts shall be avoided and minimized to the greatest extent possible, pursuant to 15A NCAC 2B.0243. New development activities located in the projected 50-foot wide riparian areas within the basin shall be limited to “uses” identified within and constructed in accordance with 15A NCAC 2B.0243. The FEIS does not contain an impact table for buffer impacts, but referenced a table included in the DEIS. Based on the DEIS, impacts to protected riparian buffers are proposed on the east side of the Catawba River and potentially to both sides of the South Fork Catawba River. No impacts to the riparian buffer are identified for Catawba Creek per the DEIS. The table in the DEIS does not provide specific locations (or mapping information) for impacts associated with the preferred alternative (DSA 9). The NCTA is advised that while the construction of bridges through riparian buffers does not require mitigation, impacts for the roadway approaches to the bridge will require mitigation, if the impact amounts exceed the “allowable without mitigation” threshold (per DWQ Buffer Clarification memo dated 09/27/10). As part of the permit application, NCTA must provide mapping and tables clearly depicting buffer impacts. Buffer mitigation may be required for buffer impacts resulting from activities classified as “allowable with mitigation” within the “Table of Uses” section of the Buffer Rules or require a variance under the Buffer Rules. A buffer mitigation plan, including use of the NC Ecosystem Enhancement Program, must be provided to NCDWQ prior to approval of the Water Quality Certification.</p>	<p>Section 2.5.4.4 of the Final EIS provides information on the Preferred Alternative’s impacts to Catawba River buffers.</p> <p>However, in the Errata section of the Record of Decision (ROD), Section 3.1, there is a correction to these buffer impact values. The buffer impacts were incorrectly calculated for Catawba Creek. The Catawba Creek streambank limits were used to calculate buffer impacts, but the Lake Wylie FERC project boundary (569.4 above mean sea level [MSL]) should have been used. Unlike the South Fork Catawba River and Catawba River, where the streambanks generally match the Lake Wylie project boundary, the streambanks, shoreline designation, and Lake Wylie project boundary at the Catawba Creek crossing do not match. This correction applies to the Preferred Alternative refined preliminary design in the FEIS, and to DSAs 5, 9, 23, 27, 64, 68, 77, and 81 in the Draft EIS.</p> <p>ROD Section 3.1 includes a corrected table for all DSAs based on the preliminary designs used in the Draft EIS. Section 3.1 also includes a separate table for the buffer impacts of the refined preliminary design for the Preferred Alternative. The ROD Table 3, Impacts to Catawba River Buffers from the Selected Alternative Refined Preliminary Design, also includes the corrected values.</p> <p>For the Preferred Alternative refined preliminary design, buffer impacts would occur on the east bank of Catawba Creek, west bank of the South Fork Catawba River, and east bank of the Catawba River for a total of 39,920 square feet (0.91 acre) of impact to Zones 1 and 2.</p> <p>During final design, NCTA will continue to evaluate opportunities to minimize impacts to Catawba River Buffers. The permit application will include detailed information regarding anticipated buffer impacts from the Selected Alternative final</p>

Appendix C1 – Agency Comments

Table C1-3: NCDENR Division of Water Quality

Document: a003 letter dated Feb 21, 2011

COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
			design and NCTA will coordinate with permitting agencies for any required mitigation.
3	Water Resources	As stated in previous meetings, NCDWQ would prefer that mitigation be provided within close proximity to the preferred alternative to replace the functions lost as a result of direct impacts from the project. This includes providing on site mitigation and limiting, to the greatest extent possible, off site mitigation to areas located within close proximity to the preferred alternative.	NCTA is working to identify and secure on site mitigation opportunities within proximity of the project, as discussed in Section 3.3 of the ROD. The NC Ecosystem Enhancement Program (EEP) has committed the Beaverdam Creek mitigation project (see letter dated July 11, 2011 in ROD Appendix B). The project is in the fifth year of monitoring and is expected to deliver 13,534.6 stream mitigation credits. In June 2011, NCDOT acquired the Linwood Springs Golf Course property, which will provide approximately 5,700 linear feet of stream restoration along Crowders Creek, a 303(d) listed stream. The golf course property also contains several unnamed tributaries, open water ponds, and vegetated ditches that drain surface water to Crowders Creek. In addition, NCTA is continuing to pursue other adjacent parcels in this area, as well as other onsite mitigation opportunities near the project.
4	Water Resources	Based on these interviews, the Gaston East-West Connector was assumed to be completed in the allocation of future growth to specific zones. NCDWQ is unclear whether this means the road was considered to be completed in the “No Build Scenario”. Table 2-17 provides the “Estimated Change in Impervious Cover by Watershed” using baseline data from 2007 and the 2035 “No-Build” and 2035 “Build” Scenarios. Very little change in impervious cover is realized between the 2035 “No-Build” and “Build” Scenarios. The total increase in impervious cover from “No-Build” to “Build” is 0.5%, with some watersheds showing no increase in impervious cover and some showing a decrease in impervious cover. This information may support the fact that the Gaston East-West Connector was included in the “No Build” Scenario.	<p>The Gaston East-West Connector was not assumed to be completed in the No Build condition. The impervious surface cover for the No Build condition shown in Final EIS Table 2-17 does not include the project.</p> <p>Interviews with local planners conducted for the study established that the 2035 household and employment forecasts developed for the Metrolina Regional Travel Demand Model anticipated the completion the Gaston East-West Connector (e.g. the distribution of growth was already modified to account for the new roadway). Therefore, these existing forecasts were used to represent the Build Scenario distribution of households and employment in the quantitative indirect and cumulative effects assessment. The gravity model analysis was used to develop a No-Build Scenario distribution of population and employment, shifting a portion of the growth forecast for southern Gaston County and northern York County to other areas. The difference between the No-Build Scenario and Build Scenario household and employment distribution is the indirect land use effect of the project.</p> <p>For a more detailed version of the information presented in Final EIS Table 2-17, refer to Table 9 in the <i>Quantitative Indirect and Cumulative Effects Assessment</i>. Table 9 shows the direct change in impervious cover in each watershed (e.g. the roadway itself) and the indirect change (e.g. changes due to the difference between No-Build and Build household and employment distribution) that contribute to the total Build Scenario impervious surface cover. One reason the difference in impervious surface may be less than NC Division of Water Quality (NCDWQ) expected is that the direct and indirect changes in impervious surface cover sometimes counteract each other. For example, the project adds 200 acres of impervious surface directly to the Upper Crowders Creek watershed, but the indirect land use effect reduces impervious surface associated with development by 200</p>

Appendix C1 – Agency Comments

Table C1-3: NCDENR Division of Water Quality

Document: a003 letter dated Feb 21, 2011

COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
			<p>acres, resulting in no net difference between the No-Build Scenario and Build Scenario for this watershed. In the Duharts Creek-South Fork Catawba River watershed and the Paw Creek-Lake Wylie watershed, the indirect land use effects of projected shifts in the locations of growth generally balance out. In these watersheds, which are crossed by I-85 in the northern ends of the watersheds and by the Gaston East-West Connector in the southern ends, impervious surface cover increases due to growth in the southern ends are offset by growth that has shifted away from the I-85 corridor, resulting in no net difference between the No-Build Scenario and Build Scenario for these watersheds. These shifts in projected locations of growth are illustrated in Figures 2-11 and 2-12 in the Final EIS.</p>
5	Water Resources	<p>In NCDWQ's comments on the DEIS, we expressed concerns regarding the effects of stormwater runoff associated with the construction of this project. Local ordinances may not be adequate to address the water quality impacts resulting from this project.</p>	<p>Final design plans will provide treatment of the storm water runoff through best management practices as detailed in the most recent version of NCDWQ <i>Stormwater Best Management Practices</i></p>
6	Water Resources	<p>Chapter 2, Page 79, states that the "land use forecasting results are consistent with Gaston County's land use plan, but may be in consistent with York County's plan for rural residential and agricultural uses in the northern portion of the county." While NCDWQ has no jurisdiction over development activities in York County, we are concerned that the project may result in increased impacts which will affect water quality in both North and South Carolina. The FEIS also states that "overall indirect effect of the project for the ICE Study area as a whole is relatively small in comparison to the growth in households (42,200) and employment (33,100) expected between 2005 and 2035 under the No-Build Scenario. For households, the difference is a 3.6 percent increase from the No-Build Scenario to the Build Scenario. For employment the projected difference between the No-Build Scenario and the Build Scenario is 0.3 percent." As stated above, if the completion of the Gaston East-West Connector was included in the No-Build Scenario, this could present a skewed interpretation of the data.</p>	<p>The Gaston East-West Connector was not included in the No Build condition and was not assumed to be completed in the growth allocations for the No-Build scenario. The Gaston East-West Connector was included in the Build scenario.</p> <p>As discussed in Section 2.4.1 of the <i>Quantitative ICE Assessment</i>, interviews were held with planners from GUAMPO, MUMPO, RFATS, Gaston County, Mecklenburg County and York County. All three of the MPOs with responsibility for developing the demographic forecasts for the study area confirmed that the Gaston East-West Connector was assumed to be completed in the allocation of future growth to specific zones. During the demographic forecasting efforts for the Metrolina model, additional growth was added in areas that were expected to become more attractive to development with the project, including southern Gaston County and northern York County. This means that the indirect land use effect of the project is already reflected in the forecasts. Therefore, the Metrolina model forecasts were determined to represent the Build condition. All the participants concurred that the forecasts represent the Build condition and it was reasonable to use the gravity model approach to redistribute households and employment for the No-Build condition. Also, the Gaston Urban Area's 2035 Long Range Transportation Plan specifically notes that during the horizon years of 2020 and 2030, the Garden Parkway was instrumental in luring housing units (Page 7-2 of the LRTP), further supporting the fact that the socioeconomic forecasts specifically considered the Garden Parkway in allocation of growth and supporting the use of the Metrolina model socioeconomic forecasts as the Build Scenario.</p>

Appendix C1 – Agency Comments

Table C1-3: NCDENR Division of Water Quality

Document: a003 letter dated Feb 21, 2011

COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
			Indirect land use effects are the difference between the No-Build and Build condition allocations of growth. The Build condition allocation was already known (the existing MPO socioeconomic forecasts). To determine the No-Build allocation of growth to specific zones, a gravity model analysis was used. The gravity model methodology involves comparing accessibility to individual TAZs for Metrolina model runs with and without the Garden Parkway in order to allocate growth for the No-Build condition. So, a No-Build condition in this approach inherently involves removing the Garden Parkway from the model to arrive at the change in accessibility. For complete technical information on the gravity model equations, refer to Section 2.4.2 of the <i>Quantitative ICE Assessment</i> .
7	Water Resources	Stormwater discharges which are located within the riparian buffer associated with the Catawba River Basin will require the implementation of the appropriate stormwater management facility in accordance with 15A NCAC 2B.0243. NCDWQ recommends that the NCTA consider additional stormwater facilities in other areas of the project where the Catawba River Basin buffer regulations are not applicable, specifically in areas draining to those jurisdictional resources which occur on the 303(d) impaired waters list. Additionally, based on the results of the water quality modeling, stormwater measures may be required to prevent further degradation of impaired streams.	NCTA will construct the appropriate stormwater management facilities for the Catawba River buffer areas in accordance with 15A NCAC 2B.0243. For all project areas, the NCTA will prepare the erosion and sedimentation control plan in accordance with <i>Design Standards in Sensitive Watersheds</i> . NCTA will include the results of water quality modeling for the project in the Section 401 Water Quality Certification application to NCDWQ and will coordinate with NCDWQ on methods for stormwater management.
8	Water Resources	The environmental document should provide a detailed and itemized presentation of the proposed impacts to wetlands and streams with corresponding mapping. If mitigation is necessary as required by 15A NCAC 2H.0506(h), it is preferable to present a conceptual (if not finalized) mitigation plan with the environmental documentation. Appropriate mitigation plans will be required prior to issuance of a 401 Water Quality Certification.	The Draft EIS (Section 6.4.4 and Appendix N) provides a detailed presentation of potential impacts to jurisdictional resources for each DSA's preliminary design. The potential impacts to jurisdictional resources for the Preferred Alternative (DSA 9) have been updated in the Final EIS in Section 2.5.4.4 and Appendix I and are shown in Final EIS Figure 2-3. A Conceptual Mitigation Plan has been prepared for the Preferred Alternative, including a discussion of on-site mitigation, as summarized in Final EIS Section 2.5.4.4. In addition, NCTA has received agreement from the NC Ecosystem Enhancement Program (EEP) to provide compensatory mitigation through the in-lieu fee program. Additional information and updates regarding on-site mitigation are included in the Record of Decision Section 3.3 . In June 2011, NCDOT acquired the Linwood Springs Golf Course property. Crowders Creek runs through this property, and restoration of this creek segment will provide on-site mitigation for the project.

Appendix C1 – Agency Comments

Table C1-3: NCDENR Division of Water Quality

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COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
9	Water Resources	Environmental impact statement alternatives shall consider design criteria that reduce the impacts to streams and wetlands from storm water runoff. These alternatives shall include road designs that allow for treatment of the storm water runoff through best management practices as detailed in the most recent version of NCDWQ's <i>Stormwater Best Management Practices Manual</i> , July 2007, such as grassed swales, buffer areas, preformed scour holes, retention basins, etc.	Prior to construction, an erosion and sedimentation plan would be developed for the Preferred Alternative in accordance with applicable rules, regulations and guidance, including the latest version of the NCDENR publication <i>Erosion and Sediment Control Planning and Design Manual</i> , <i>Design Standards in Sensitive Watersheds</i> , the most recent version of NCDWQ's <i>Stormwater Best Management Practices Manual</i> (July 2007), and NC Department of Transportation's (NCDOT's) <i>Best Management Practices for Protection of Surface Waters</i> . NCTA will coordinate with NCDWQ to obtain the Section 401 Water Quality Certification and to determine appropriate BMPs.
10	Water Resources	After the selection of the preferred alternative and prior to an issuance of the 401 Water Quality Certification, the NCTA is respectfully reminded that they will need to demonstrate the avoidance and minimization of impacts to wetlands (and streams) to the maximum extent practical. In accordance with the Environmental Management Commission's Rules {15A NCAC 2H.0506(h)}, mitigation will be required for impacts of greater than 1 acre to wetlands. In the event that mitigation is required, the mitigation plan shall be designed to replace appropriate lost functions and values. The NC Ecosystem Enhancement Program may be available for use as wetland mitigation.	See response to Comment 3 in NCDWQ's letter (Document a003).
11	Water Resources	In accordance with the Environmental Management Commission's Rules {15A NCAC 2H.0506(h)}, mitigation will be required for impacts of greater than 150 linear feet to any single stream. In the event that mitigation is required, the mitigation plan shall be designed to replace appropriate lost functions and values. The NC Ecosystem Enhancement Program may be available for use as stream mitigation.	See response to Comment 3 in NCDWQ's letter (Document a003).
12	Water Resources	Future documentation, including the 401 Water Quality Certification Application, shall continue to include an itemized listing of the proposed wetland and stream impacts with corresponding mapping.	All impacts, corresponding mapping, and mitigation information will be included in the 401 Water Quality Certification Application submitted by NCTA to NCDWQ.
13	Water Resources	NCDWQ is very concerned with sediment and erosion impacts that could result from this project. NCTA shall address these concerns by describing the potential impacts that may occur to the aquatic environments and any mitigating factors that would reduce the impacts.	See response to Comment 1 in NCDWQ's letter (Document a003).

Appendix C1 – Agency Comments

Table C1-3: NCDENR Division of Water Quality

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COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
14	Indirect and Cumulative Effects	An analysis of cumulative and secondary impacts anticipated as a result of this project is required. The type and detail of analysis shall conform to the NC Division of Water Quality Policy on the assessment of secondary and cumulative impacts dated April 10, 2004. NCTA is respectfully reminded that all impacts, including but not limited to, bridging, fill, excavation and clearing, and rip rap to jurisdictional wetlands, streams, and riparian buffers need to be included in the final impact calculations. These impacts, in addition to any construction impacts, temporary or otherwise, also need to be included as part of the 401 Water Quality Certification Application.	A quantitative indirect and cumulative effects analysis was prepared for the Preferred Alternative and summarized in Section 2.5.5 of the Final EIS. The NCDWQ participated in the scoping of this quantitative study. Subsequent emailed comments from NCDWQ requested that the Fites Creek watershed area be added to the study area. The lead agencies agreed and this area was added to the study and a summary of the results is included in the Record of Decision Section 3.5 . All project impacts to jurisdictional resources will be included in final impact calculations provided in the permit applications.
15	Water Resources	Where streams must be crossed, NCDWQ 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, NCTA should not install the bridge bents in the creek, to the maximum extent practicable.	Culverts will be buried in accordance with NCDOT Hydraulic Unit's March 18, 2004 reference entitled "Pipe Burial Depths. The major drainage structures and crossings were reviewed by the environmental resource and regulatory agencies at Turnpike Environmental Agency Coordination (TEAC) meetings on February 5, March 4, and April 8, 2008. As a result of these meetings, NEPA/404 Merger process Concurrence Point 2a was achieved (form included in Appendix A-1 of the Draft EIS), and the NCTA agreed to include bridges at several locations previously recommended for culverts in order to avoid or minimize stream and wetland impacts.
16	Water Resources	Whenever possible, NCDWQ prefers spanning structures. Spanning structures usually do not require work within the stream or grubbing of the streambanks and do not require stream channel realignment. The horizontal and vertical clearances provided by bridges shall allow for human and wildlife passage beneath the structure. Fish passage and navigation by canoeists and boaters shall not be blocked. Bridge supports (bents) should not be placed in the stream when possible.	Comment acknowledged and will be considered during final design. A wildlife passage is planned to be installed at Stream S156. This is a project commitment included in the ROD Appendix A .
17	Water Resources	Bridge deck drains shall not discharge directly into the stream. Stormwater shall be directed across the bridge and pre-treated through site-appropriate means (grassed swales, pre-formed scour holes, vegetated buffers, etc.) before entering the stream. Please refer to the most current version of NCDWQ's <i>Stormwater Best Management Practices</i> .	The Design-Build team will be required to provide bridge drainage features that prevent direct discharge into surface waters.
18	Water Resources	Sediment and erosion control measures should not be placed in wetlands or streams.	Comment acknowledged. See response to Comment 1 in NCDWQ's letter (Document a003).
19	Water Resources	Borrow/waste areas should avoid wetlands to the maximum extent practical. Impacts to wetlands in borrow/waste areas will need to be presented in the 401 Water Quality Certification and could precipitate compensatory mitigation.	The Design-Build team will be required to acquire applicable permits relative to borrow pits and comply with requirements for borrow pits, dewatering, and any temporary work conducted in jurisdictional areas.

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Table C1-3: NCDENR Division of Water Quality

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COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
20	Water Resources	The 401 Water Quality Certification application will need to specifically address the proposed methods for stormwater management. More specifically, stormwater shall not be permitted to discharge directly into streams or surface waters.	The application for a 401 Water Quality Certification will include proposed methods for stormwater management.
21	Water Resources	Based on the information presented in the document, the magnitude of impacts to wetlands and streams may require an Individual Permit (IP) 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 NCTA and written concurrence from NCOWQ. Please be aware that any approval will be contingent on appropriate avoidance and minimization of wetland and stream impacts to the maximum extent practical, the development of an acceptable stormwater management plan, and the inclusion of appropriate mitigation plans where appropriate.	NCTA will obtain all applicable permits, including a Clean Water Act Section 404 Individual Permit and associated Clean Water Act Section 401 Water Quality Certification. Avoidance and minimization measures incorporated into the Preferred Alternative are discussed in Sections 2.3.3 and 2.5.4.4 of the Final EIS. Additional opportunities for avoidance and minimization will be evaluated as part of final design.
22	Water Resources	If concrete is used during construction, a dry work area shall be maintained to prevent direct contact between curing concrete and stream water. Water that inadvertently contacts uncured concrete shall not be discharged to surface waters due to the potential for elevated pH and possible aquatic life and fish kills.	All currently approved NCDOT best management practices (BMPs) for the protection of surface waters, in accordance with the approved erosion and sedimentation control plan, will be implemented during project construction. It is NCDOT's standard practice to require that measures are taken during construction to prevent live or fresh concrete from coming into contact with any surface waters.
23	Water Resources	If temporary access roads or detours are constructed, the site shall be graded to its preconstruction contours and elevations. Disturbed areas shall be seeded or mulched to stabilize the soil and appropriate native woody species shall be planted. When using temporary structures the area shall be cleared but not grubbed. Clearing the area with chain saws, mowers, bush-hogs, or other mechanized equipment and leaving the stumps and root mat intact allows the area to re-vegetate naturally and minimizes soil disturbance.	Temporary access and haul roads, other than public roads, constructed or used in connection with the project shall be considered a part of the project and addressed in the Erosion and Sedimentation Control Plan. This requirement will be included in contracts of Design-Build Teams.

Appendix C1 – Agency Comments

Table C1-3: NCDENR Division of Water Quality

Document: a003 letter dated Feb 21, 2011

COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
24	Water Resources	Placement of culverts and other structures in waters, streams, and wetlands shall be placed below the elevation of the streambed by one foot for all culverts with a diameter greater than 48 inches, and 20 percent of the culvert diameter for culverts having a diameter less than 48 inches, to allow low flow passage of water and aquatic life. Design and placement of culverts and other structures including temporary erosion control measures shall not be conducted in a manner that may result in dis-equilibrium of wetlands or streambeds or banks, adjacent to or upstream and downstream of the above structures. The applicant is required to provide evidence that the equilibrium is being maintained if requested in writing by NCDWQ. If this condition is unable to be met due to bedrock or other limiting features encountered during construction, please contact NCDWQ for guidance on how to proceed and to determine whether or not a permit modification will be required.	Culverts will be buried in accordance with NCDOT Hydraulic Unit's March 18, 2004 reference entitled "Pipe Burial Depths."
25	Water Resources	If multiple pipes or barrels are required, they shall be designed to mimic natural stream cross section as closely as possible including pipes or barrels at flood plain elevation, floodplain benches, and/or sills may be required where appropriate. Widening the stream channel should be avoided. Stream channel widening at the inlet or outlet end of structures typically decreases water velocity causing sediment deposition that requires increased maintenance and disrupts aquatic life passage.	The final design for the Preferred Alternative will be completed in accordance with the NCDOT <i>Guidelines for Drainage Studies and Hydraulic Design</i> .
26	Water Resources	If foundation test borings are necessary; it shall be noted in the document. Geotechnical work is approved under General 401 Certification Number 3687/Nationwide Permit No.6 for Survey Activities.	If additional geotechnical investigations are needed, subsurface investigations, including borings, will be conducted in accordance with the current NCDOT <i>Geotechnical Unit Guidelines and Procedures Manual</i> .
27	Water Resources	Sediment and erosion control measures sufficient to protect water resources must be implemented and maintained in accordance with the most recent version of North Carolina Sediment and Erosion Control Planning and Design Manual and the most recent version of NCS000250.	The Erosion and Sediment Control Plan will be implemented and maintained during the construction of the project in accordance with all applicable laws and regulations.
28	Water Resources	All work in or adjacent to stream waters shall be conducted in a dry work area. Approved BMP measures from the most current version of NCDOT Construction and Maintenance Activities manual such as sandbags, rock berms, cofferdams and other diversion structures shall be used to prevent excavation in flowing water.	NCTA will implement approved BMP measures from the most current version of NCDOT <i>Construction and Maintenance Activities Manual</i> .

Appendix C1 – Agency Comments

Table C1-3: NCDENR Division of Water Quality

Document: a003 letter dated Feb 21, 2011

COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
29	Water Resources	While the use of National Wetland Inventory (NWI) maps, NC Coastal Region Evaluation of Wetland Significance (NC-CREWS) maps and soil survey maps are useful tools, their inherent inaccuracies require that qualified personnel perform onsite wetland delineations prior to permit approval.	As discussed in Section 6.4.3.1 of the Draft EIS, wetlands were delineated by qualified personnel from October 2006 through March 2007. Jurisdictional verification of delineated features was received from NCDWQ in June 2010. The US Army Corps of Engineers (USACE) will provide verification during the permitting process.
30	Water Resources	Heavy equipment should be operated from the bank rather than in stream channels in order to minimize sedimentation and reduce the likelihood of introducing other pollutants into streams. This equipment shall be inspected daily and maintained to prevent contamination of surface waters from leaking fuels, lubricants, hydraulic fluids, or other toxic materials.	NCTA will implement approved BMP measures from the most current version of NCDOT <i>Construction and Maintenance Activities Manual</i> .
31	Water Resources	Riprap shall not be placed in the active thalweg channel or placed in the streambed in a manner that precludes aquatic life passage. Bioengineering boulders or structures should be properly designed, sized and installed.	All appropriate measures will be taken to protect streams and aquatic life based on NCDOT standard practices. Rip rap is removed from streams where stream velocities are not erosive.
32	Water Resources	Riparian vegetation (native trees and shrubs) shall be preserved to the maximum extent possible. Riparian vegetation must be reestablished within the construction limits of the project by the end of the growing season following completion of construction.	Appropriate measures will be taken to preserve and reestablish riparian vegetation to the maximum extent possible. NCTA will require the Design-Build teams to preserve trees, where possible, along the project. In addition, final designs will be prepared in accordance with BMPs from NCDOT's toolbox, which recommend the reestablishment of riparian vegetation.



a004

North Carolina Wildlife Resources Commission

TO: Melba McGee, Environmental Coordinator
Department of Environment and Natural Resources

FROM: Marla Chambers, Western NCDOT Permit Coordinator *Marla Chambers*
Habitat Conservation Program, NCWRC

DATE: February 14, 2011

SUBJECT: Review of the Final Environmental Impact Statement for the proposed Gaston East-West Connector, a toll road from I-85 west of Gastonia to I-485 near the Charlotte-Douglas International Airport, Gaston and Mecklenburg Counties. TIP No. U-3321. DENR Project No.: 11-0166, due 02/09/2011, extended to 02/14/2011.

The North Carolina Turnpike Authority (NCTA), now under the North Carolina Department of Transportation (NCDOT), has submitted a Final Environmental Impact Statement (FEIS) for the proposed Gaston East-West Connector. Staff biologists with the North Carolina Wildlife Resources Commission (NCWRC) have reviewed the information provided and represent the agency at Turnpike Environmental Agency Coordination (TEAC) meetings. These comments are provided in accordance with the provisions of the National Environmental Policy Act (42 U.S.C. 4332(2)(c)) and the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661-667d).

Comments regarding this project have been submitted to NCDOT and NCTA, as appropriate, throughout the planning process through written comments, emails, and participation in meetings. Comments on the Draft Environmental Impact Statement (DEIS) were submitted July 7, 2009 and the concerns and recommendations expressed regarding direct and indirect impacts to the natural environment resulting from the project remain valid.

NCTA proposes to construct a controlled-access new location toll facility from I-85 west of Gastonia through southern Gaston County to I-485 near the Charlotte-Douglas International Airport in Mecklenburg County. The Recommended Alternative identified in the DEIS, Detailed Study Alternative (DSA) 9, was presented as the Preferred Alternative in the Final

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1 Environmental Impact Statement (FEIS) and received concurrence by the interagency team as the Least Environmentally Damaging Practicable Alternative (LEDPA). Several design modifications have been made to the Preferred Alternative since the DEIS, most as a result of comments received and the addition of service roads. As a result, stream impacts were reduced by approximately 25 percent (2.36 miles) to 36,416 linear feet and wetland impacts were reduced by 6 percent (0.4 acres) to 7.0 acres. Revision of the typical section was included in the design modifications, which reduces the project from a six-lane facility to a four-lane road east of US 321, with an additional auxiliary lane in each direction between NC 273 and I-485. West of US 321 a two-lane roadway is proposed initially with two additional lanes to be constructed later.

We remain concerned about the considerable direct and indirect impacts expected to occur as a result of the project. Water quality in much of the project area is currently degraded, as evidenced by the number of streams on the State's 303(d) list of impaired waters that cross the project or are in the study area. Further degradation to area waterways appears to be likely from both direct and indirect project impacts. In the quantitative analysis of indirect and cumulative effects in the FEIS, projected impervious cover was used to determine water quality effects. Considerable increases in impervious coverage are expected under the No-Build scenario, going from 12.5 percent impervious area for current conditions of the study area to 19.3 percent. Additional increases are projected if the project is built, to 19.8 percent impervious cover, with four of the eight watersheds exceeding 25 percent coverage. The project accounts for approximately 800 acres, or about 6.8 percent of the cumulative increase.

2 The quantitative analysis used tree cover and forest interior habitat to determine impacts to wildlife and address habitat fragmentation. A range of approximately 8,500 to 20,500 acres of tree cover were projected to be lost as a result of future development under the No-Build scenario. Approximately 1,000 acres of tree cover would be directly impacted by the refined preliminary design of the Build alternative. These direct impacts would include 290 acres of forested interior habitat and would have the potential to reduce the quality of an additional 480 acres of forested interior habitat within about 300 feet of the right-of-way. The changes in the development pattern associated with the Preferred Alternative could increase tree cover loss by 100 to 1,400 acres and the cumulative loss of forest cover was projected to be between 9,500 and 22,900 acres over existing conditions, a decrease of 10 to 24 percent. This analysis appears to reveal several locations where wildlife crossings may be appropriate to maintain some connectivity between forest habitats fragmented by the project.

3 With or without constructing the proposed project, considerable changes in land use, impervious cover, and wildlife habitat are projected to occur, and construction of the project is expected to incrementally increase these effects. It appears that considerable efforts will be needed to reduce the negative effects to water quality and wildlife in the project area, even if the project is not constructed, and we strongly encourage the local officials, NCTA, and NCDOT to work together to implement protective actions. The document provides a list of mitigation strategies that could be used to reduce the magnitude of the indirect and cumulative impacts from the project. Our "Guidance Memorandum to Address and Mitigate Secondary and Cumulative Impacts to Aquatic and Terrestrial Wildlife Resources and Water Quality" (NCWRC 2002), also provides measures to mitigate secondary and cumulative impacts.

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Gaston East-West Connector FEIS
Gaston & Mecklenburg Co's

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February 14, 2011

Thank you for the opportunity to review and comment on this project. If you have any questions regarding these comments, please contact me at (704) 485-8291. We look forward to continuing our participation in the planning process for this project.

Literature Cited:

NCWRC (North Carolina Wildlife Resources Commission). 2002. Guidance Memorandum to Address and Mitigate Secondary and Cumulative Impacts to Aquatic and Terrestrial Wildlife Resources and Water Quality. NCWRC, Raleigh. Available: http://www.ncwildlife.org/Wildlife_Species_Con/documents/pg7c3_impacts.pdf (February 2010).

cc: Sarah E. Hair, USACE
Marella Buncick, USFWS
Christopher Militscher, USEPA
Polly Lespinasse, NCDWQ

Appendix C1 – Agency Comments

Table C1-4: North Carolina Wildlife Resources Commission

Document: a004 letter dated Feb 14, 2011

COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
1	Roadway Design	Several design modifications have been made to the Preferred Alternative since the DEIS, most as a result of comments received and the addition of service roads. As a result, stream impacts were reduced by approximately 25 percent (2.36 miles) to 36,416 linear feet and wetland impacts were reduced by 6 percent (0.4 acres) to 7.0 acres. Revision of the typical section was included in the design modifications, which reduces the project from a six-lane facility to a four-lane road east of US 321, with an additional auxiliary lane in each direction between NC 273 and I-485. West of US 321 a two-lane roadway is proposed initially with two additional lanes to be constructed later.	Thank you for noting design modifications to acknowledge our effort to modify the project in consideration of feedback received during agency coordination. Section 2.3.3 of the Final EIS lists the changes in stream and wetland impacts resulting from the design changes incorporated into the Preferred Alternative preliminary design. Regarding the project section west of US 321, an initial construction phase currently proposed is to construct two lanes from US 321 west to I-85. The Gaston Urban Area Metropolitan Planning Organization's (GUAMPO's) 2035 Long Range Transportation Plan includes the construction of the ultimate four-lane section by 2035.
2	Protected Species and Wildlife	This analysis appears to reveal several locations where wildlife crossings may be appropriate to maintain some connectivity between forest habitats fragmented by the project.	NCTA will coordinate with the US Fish and Wildlife Service and the NC Wildlife Resources Commission on the feasibility and the design of a wildlife passage at Stream S156. Stream S156 is located between Forbes Road to the west and Robinson Road to the east. There will also likely be opportunities for wildlife crossings at other streams proposed for bridging.
3	Indirect and Cumulative Effects	It appears that considerable efforts will be needed to reduce the negative effects to water quality and wildlife in the project area, even if the project is not constructed, and we strongly encourage the local officials, NCTA, and NCDOT to work together to implement protective actions. The document provides a list of mitigation strategies that could be used to reduce the magnitude of the indirect and cumulative impacts from the project. Our "Guidance Memorandum to Address and Mitigate Secondary and Cumulative Impacts to Aquatic and Terrestrial Wildlife Resources and Water Quality" (NCWRC 2002), also provides measures to mitigate secondary and cumulative impacts.	NCTA can encourage local governments to adopt regulations and land use plans that would help protect significant natural resources, but NCDOT and NCTA lack any enforcement authority to ensure their adoption or adherence



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a005

North Carolina Department of Environment and Natural Resources
Office of Conservation, Planning, & Community Affairs

Beverly Eaves Perdue, Governor

Linda Pearsall, Director

Dee Freeman, Secretary

February 8, 2011

MEMORANDUM

TO: Melba McGee, DENR Environmental Coordinator
FROM: ^{HJL} Harry LeGrand, Natural Heritage Program
SUBJECT: FEIS - Gaston East-West Corridor: Improvements to east-west transportation mobility on the area around Gastonia and other towns in southern Gaston and western Mecklenburg counties; TIP U-3321

REFERENCE: Project No. 11-0166

1 The Natural Heritage Program is quite concerned that this project has proceeded to an FEIS without apparent Natural Heritage Program input into environmental concerns with this project. Our Program has several records of rare species and a significant natural heritage within the project area, and very close to Alternative 9, the Recommended alternative (Figure 1-4b).

2 Of great concern is that Section H3 comes extremely close to the Stagecoach Road Granite Outcrop, of Regional significance (see enclosed map and site report). This site was identified in the "Gaston County Natural Heritage Inventory", by Dr. Alan May, December 2000. Based on Figure 1-4b, the southern end of Section H3 runs east of Crowders Creek and crosses Blackwood Creek, running along the center of a ridge south of Blackwood Creek. The flatrock is south of Blackwood Creek, but very close to the center of this ridge (see enclosed map and site report). Therefore, we oppose the alignment of Section H3, as it appears that this route will destroy or greatly impact the site. Thus, Alternative 9 is also opposed by our Program, unless a slight alignment adjustment can be made east or west to avoid this important site. Alternatives 22, 23, or 27 best avoid this natural area, and also avoid coming close to Crowders Mountain State Park.

3 Near the northwestern end of the project is a D-ranked occurrence of the State Threatened and Federal Candidate Georgia aster (*Synphyotrichum georgianum*), along with an historical record of the State Significantly Rare Virginia stickseed (*Hackelia virginiana*). The aster population occurs in a powerline right-of-way. Section H2A comes very close, if not on top of, this aster population (see enclosed map). Because the alternative western terminus of the project (Section H1A) runs very close to the eastern edge of Crowders Mountain State Park, perhaps inhibiting the Division of Parks and Recreation from adding land to the park on the east side, our Program supports Section H2A over Section H1A. However, it is recommended that a survey of this aster population be conducted prior to construction, to determine its exact location and to "fine-tune" the alignment of Section H2A to avoid this rare plant location.

4 The portion of the project area southeast of Gastonia comes very close to a Catawba Lands Conservancy easement, totaling 152 acres (see enclosed map). This managed/conservation area is perhaps surprisingly

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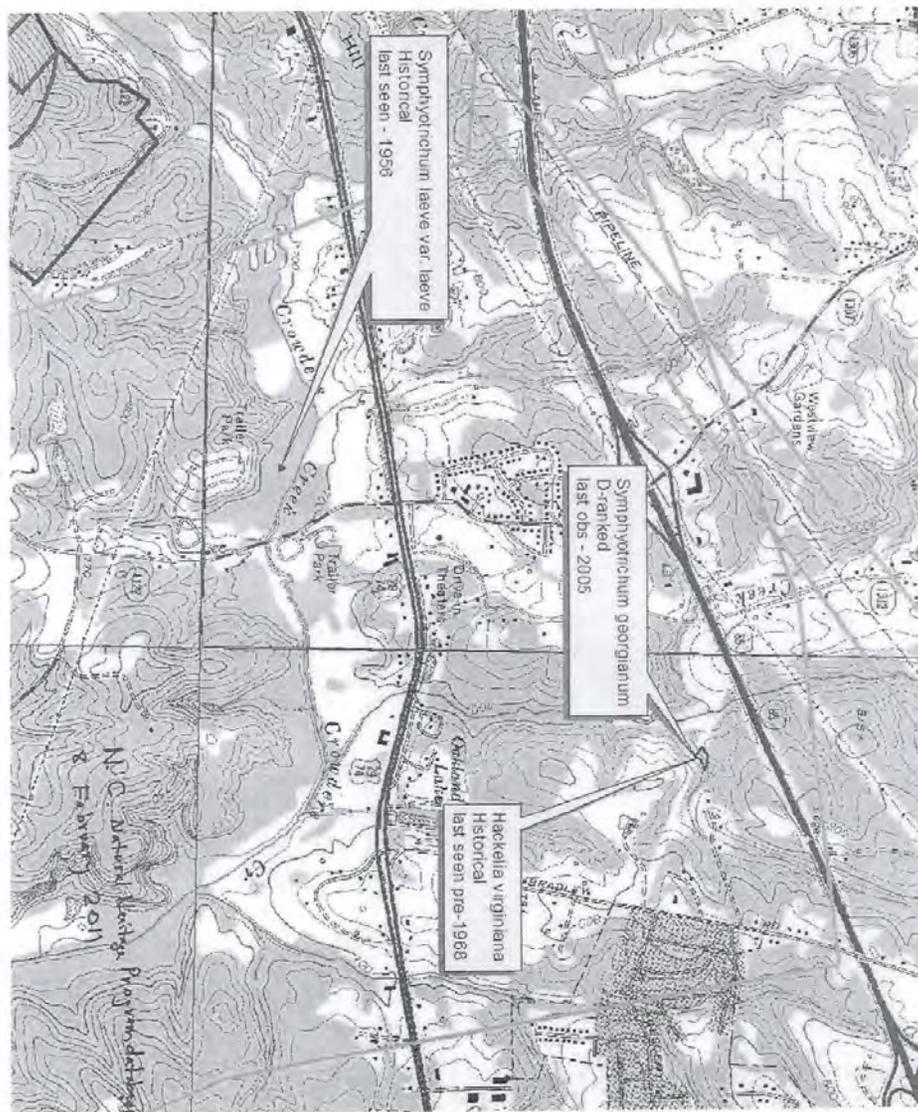
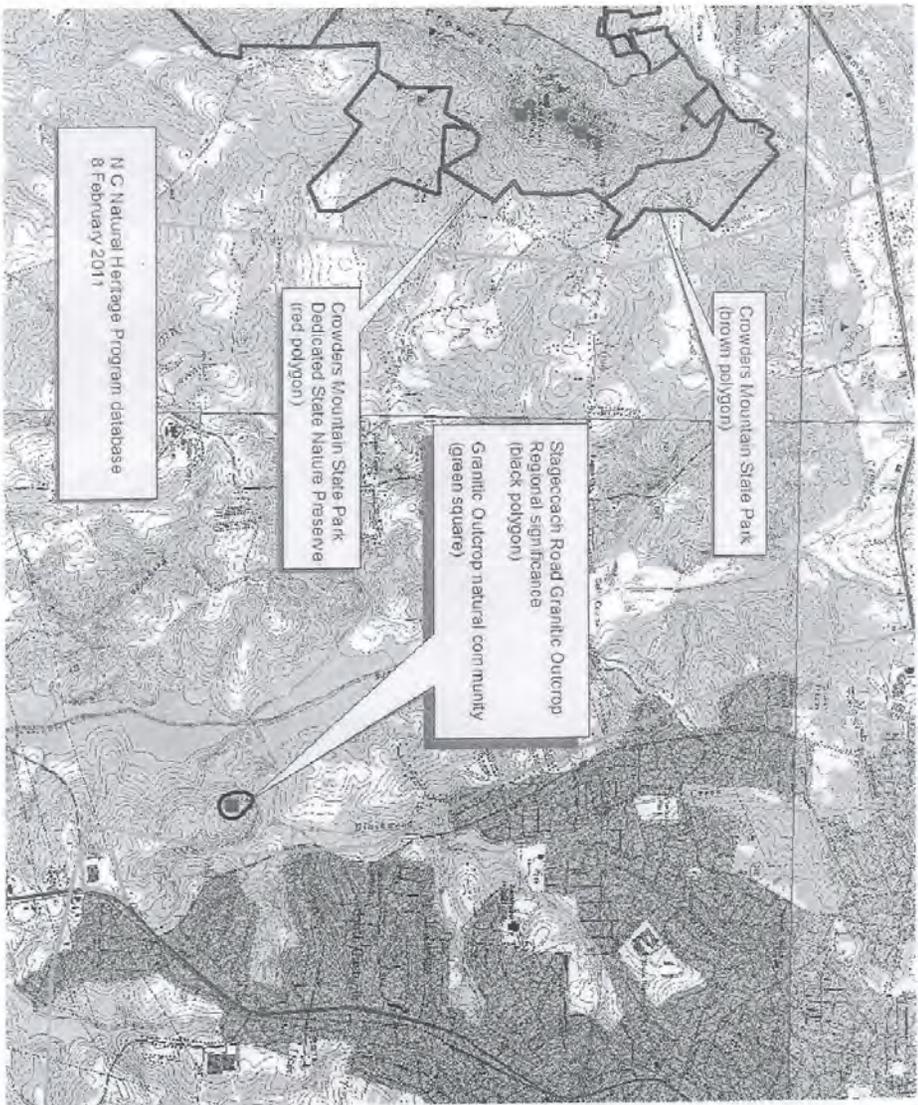


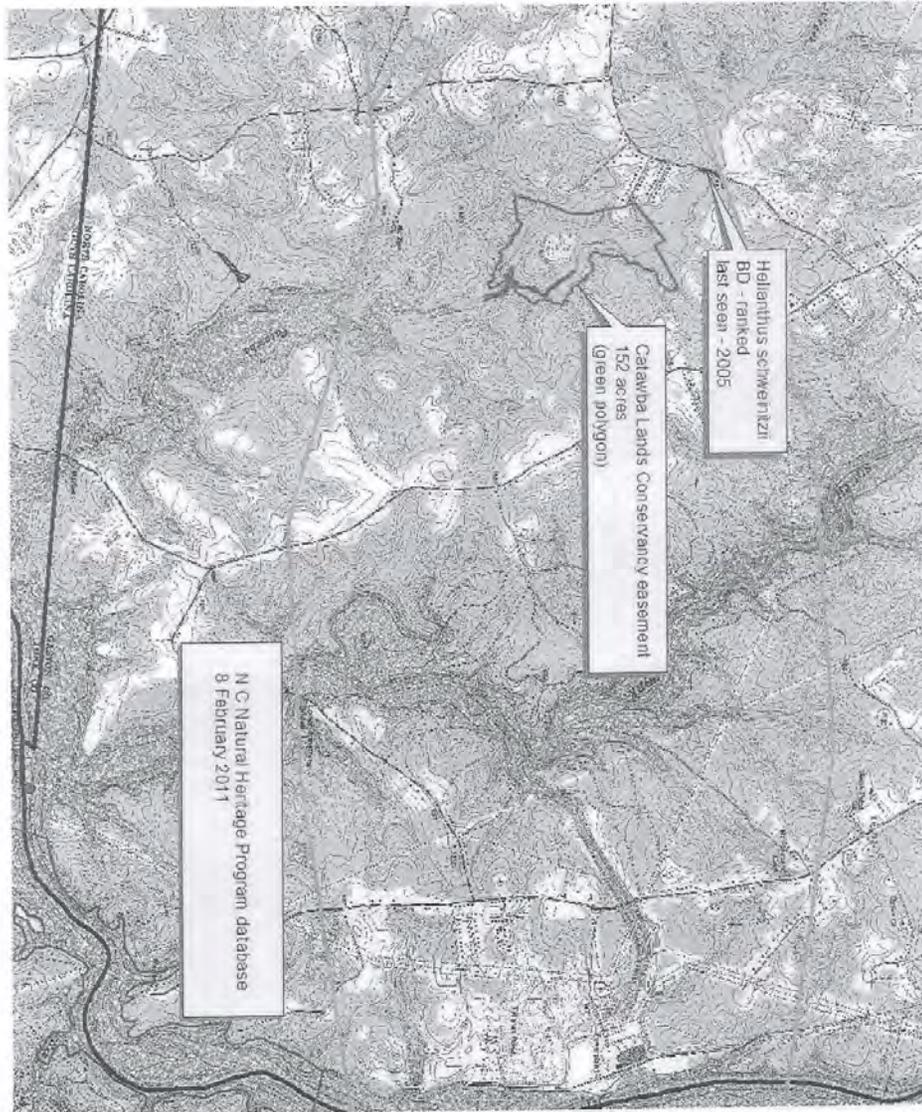
not portrayed on the project maps (Figures 1-4a, 1-5a, and 1-5b). Section K2A comes close to the northern edge of the easement area, as seen on Figure 1-4a. Also, Section K2A comes just south of a roadside population of the Federal and State Endangered Schweinitz's sunflower (*Helianthus schweinitzii*) (see enclosed map). Fortunately, the Recommended Alternative (9) utilizes Section K3A, which seems to run south of the conservation easement and would thus be downstream of it and would not impact it through sedimentation. Alternatives 4, 22, 58, and 76 appear to use Section K2A, and are therefore not recommended by our Program.

5 In summary, the Program cannot support Alternative 9, the Recommended Alternative, because it would most likely impact or destroy the Stagecoach Road Granite Outcrop natural area. The Natural Heritage Program prefers Alternative 23 or Alternative 27 as the alternatives that would least impact the Stagecoach Road Granite Outcrop, the Schweinitz's sunflower population, the Catawba Lands Conservancy easement, and Crowders Mountain State Park. The population of Georgia aster might be impacted by Alternatives 23 or 27, but these two routes clearly avoid the granitic flatrock.

Please do not hesitate to contact me at 919-715-8697 if you have questions or need further information.

Enclosures





SITE DESCRIPTION: Gaston County Natural Heritage Inventory - 1999

SITE NUMBER: A04 **NAME OF SITE:** Stagecoach Road Granitic Outcrop and Wetland

Size: 30+ acres **Quadrangle:** Gastonia South
Province: PIEDMONT **Watershed:** Crowders Creek

Site Significance:
REGIONAL (Largest and best preserved granitic outcrop in county.)

Special Status Species (attach EORs):

Potential for other Special Status Species:

Other noteworthy species or features present: *Sedum smallii*, *Hypericum gentianoides*, *Talinum teretifolium*, *Asimina parviflora*

PHYSICAL DESCRIPTION

Adjacent to slope is an outcrop (ca. 2 acres). Vegetation islands separate the exposures. Many of the terraces have shallow pools with thin soil.

Locations and Directions:

From 321 South, the outcrop is west of Stagecoach Rd at Blackwood Creek. Approach from Stagecoach Rd at the entrance to a new sewer line along Blackwood Creek. Walk West along the construction r/w and creek, cross the flood plain. Proceed up the slope moving WSW. Outcrop is several hundred yards to the West.

Landscape Description:

Aspect: N, E, S, W **Slope:** Flat - 25' **Elevation (ft above MSL):** 610

Topographic Position: Upper/Mid/Lower Slopes, Alluvial Flat

Hydrology: Terrestrial, Palustrine

Moisture: Mesic/Dry Mesic/Xeric (Dry),
Seasonally Flooded

Geology: Massive granitic rock outcrop from the Pennsylvanian to Permian (270-230my). Particularly meya crystic to equigranular High Shoals Granite

Soils: PaE-Pacolet sandy loam, 15-25% slopes; Ro-rock outcrop

Comments on Physical Description:

Remaining "Hugo" damage in some areas of the slope. Rich slope leading to outcrop area.

BIOLOGICAL DESCRIPTION

A. Sloping Granitic Flat Rock and Bottomland Forest.

B. Open rock areas: Vegetation dominated by distinct species that tend to thrive in thin soils and form small islands. The dominant species in these communities is *Sedum smallii*, *Talinum teretifolium*, *Hypericum gentianoides*, *Sphagnum* spp. and other mosses. Surrounding the outcrop is a rich woods slope dominated by *Carya glabra* and *C. tomentosa* in the canopy and subcanopy. Other understory species include *Chionanthus virginicus*, *Calycanthus floridus*, *Viburnum nudum*, *Rhamnus caroliniana*, *Cornus alternifolia*, *Asimina parviflora*, *Castanea pumila* and *Sassafras albidum*. Dominant vines include *Matalea carolinensis*, *Campsis radicans* and *Vitis rotundifolia*. The herbaceous layer becomes more diverse on the slopes, as is expected. Species include *Aristolochia serpentaria*, *Cynoglossum virginianum*, *Commelina* spp., *Impatiens capensis*, *Ligusticum canadensis*, *Monotropa uniflora*, *Trillium catesbaei*, *Sanguinaria canadensis*, *Uvularia perfoliata*, *Polystichum acrostichoides* and *Woodwardia areolata*. Along the edge of the granitic outcrop area there are lots of *Agave virginica*.

C. This site is unique due to the overwhelming dominance of *Carya glabra* and *C. tomentosa*.

D. The rock outcrop grades into a mesic Hickory dominated forest with rich slopes.

E. The quality of this site is good. There are some areas with remaining "HUGO" damage.

F. ca. 3000 x 1250 map feet, approx. 30+ acres.

Site Integrity: Good

Fire regime:

Maximum DBH of canopy trees: 26"

Average DBH of canopy trees: 13"

Logged (y/n): Yes

Stream channelized (y/n): No

Even-aged canopy (y/n): Yes

Dredging/filling (y/n): No

Non-native / weedy species present (y/n): No

Understory cleared (y/n): No

Ditched/draind (y/n): No

Grazing (y/n): No

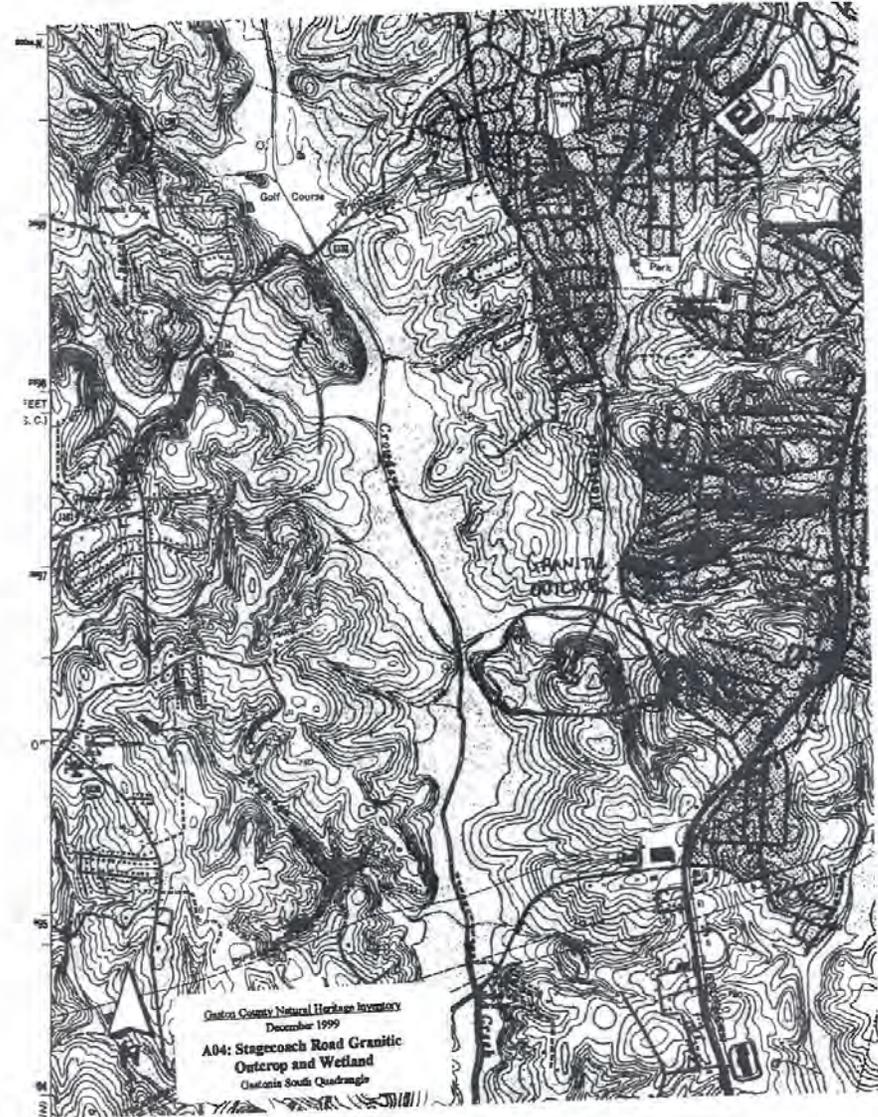
a005

SITE DESCRIPTION: Gaston County Natural Heritage Inventory - 1999**SITE NUMBER:** A04 **NAME OF SITE:** Stagecoach Road Granitic Outcrop and Wetland**Comments on Biological Description:**

Dominants are *Carya* spp. in canopy. Rich woods slope dominated by *Carya glabra*. Adjacent is an outcrop (ca. 2 acres) with vegetation islands separating the exposures. Many of the terraces have shallow pools with thin soil dominated by *Sedum smallii*.

ADJACENT LAND USE: 0**PROTECTION / MANAGEMENT NEEDS:****DOCUMENTATION:**

We walked in the site through rich woods slopes which led to the (ca. 2 ac.) outcrop site. The rich slopes are a good buffer zone for the outcrop itself. Since the survey, this site has been timbered, except for a 50' buffer around the outcrop. Specimens collected for UNCC herbarium.

PLANT SPECIES LIST:**CANOPY:** *Carya tomentosa*, *C. glabra*, *Quercus alba*, *Juglans nigra*.**SUBCANOPY:** *Carpinus caroliniana*, *Quercus velutina*.**SHRUBS:** *Viburnum nudum*, *Rhamnus caroliniana*, *Cornus alternifolia*, *Asimina parviflora*, *Ilex decidua*, *Castanea pumila*, *Sassafras albidum*, *Corylus cornuta*, *Asimina triloba*.**VINES:** *Matalea carolinensis*, *Campsis radicans*, *Vitis rotundifolia*.**HERBS:** *Aristolochia serpentaria*, *Agave virginica*, *Aureolaria virginica*, *Cimicifuga racemosa*, *Collinsonia canadensis*, *Cynoglossum virginianum*, *Commelina* spp., *Epilobium coloratum*, *Hypericum gentianoides*, *Impatiens capensis*, *Ligusticum canadense*, *Medeola virginica*, *Monotropa uniflora*, *Polygonatum biflorum*, *Trillium catesbeii*, *Sanguinaria canadensis*, *Talinum terrefolium*, *Sedum smallii*, *Uvularia perfoliata*.**FERNS:** *Polystichum acrostichoides*, *Woodwardia areolata*, *Asplenium platyneuron*.**ANIMAL SPECIES LIST:****DATE:** 18-Oct-96**UPDATES:** 06-June-97**OWNER NAME:** Private

Appendix C1 – Agency Comments

Table C1-5: NCDENR Office of Conservation, Planning, & Community Affairs – Natural Heritage Program

Document: a005 letter dated Feb 8, 2011

COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
1	Protected Species and Wildlife	The Natural Heritage Program is quite concerned that this project has proceeded to an FEIS without apparent Natural Heritage Program input into environmental concerns with this project. Our Program has several records of rare species and a significant natural heritage within the project area, and very close to Alternative 9, the Recommended alternative (Figure 1-4b).	<p>The scoping letter for the proposed project was received by the NC State Clearinghouse on April 23, 2003 and distributed to NCDENR agencies. The NC Natural Heritage Program (NC NHP) is one of the agencies that receive comment requests through the State Clearinghouse, although no response to the scoping letter was received from the NC NHP.</p> <p>However, the NC NHP records and files were reviewed for the project area. The Draft EIS Section 6.2.4 – Important Natural Areas describes “lands identified by the North Carolina Natural Heritage Program as significant natural areas, and lands protected under conservation easements by the Catawba Lands Conservancy.”</p> <p>The Draft EIS Section 6.5.2.2 and Table 6-8 include “organisms that are listed as State Endangered (E), Threatened (T), or Special Concern (SC) on the NCNHP List of Rare Plant and Animal Species.” Also, as stated in Draft EIS Section 6.5.3 – Surveys for Protected Species, “files from the NCNHP were reviewed for documented sightings of species on state or federal lists.”</p>
2	Alternatives Considered	Therefore, we oppose the alignment of Section H3, as it appears that this route will destroy or greatly impact the site. Thus, Alternative 9 is also opposed by our Program, unless a slight alignment adjustment can be made east or west to avoid this important site.	This comment is referring to the Stagecoach Road Granitic Outcrop site. This site is within the study corridor boundaries of Corridor Segment H3. However, as stated in Final EIS Section 1.3.4.3 and Draft EIS Section 6.3.6.4, none of the preliminary designs for the Detailed Study Alternatives, including Alternative 9, would impact the Stagecoach Road Granitic Outcrop site. The preliminary design within Corridor Segment H3 would pass to the west of the outcrop site, as shown in Final EIS Figure 2-3f.
3	Protected Species and Wildlife	Near the northwestern end of the project is a D-ranked occurrence of the State Threatened and Federal Candidate Georgia aster (<i>Symphyotrichum georgianum</i>), along with an historical record of the State Significantly Rare Virginia stickseed (<i>Hackelia virginiana</i>). The aster population occurs in a power line right-of-way. Section H2A comes very close, if not on top of, this aster population (see enclosed map). Because the alternative western terminus of the project (Section H1A) runs very close to the eastern edge of Crowders Mountain State Park, perhaps inhibiting the Division of Parks and Recreation from adding land to the park on the east side, our Program supports Section H2A over Section H1A. However, it is recommended that a survey of this aster population be conducted prior to construction, to determine its exact location and to “fine-tune” the alignment of Section H2A to avoid this rare plant location.	<p>As discussed in Draft EIS Section 6.5.4.2, a population of Georgia aster was observed in the DSAs during field surveys. This population contained many asters in peak bloom and was located south of I-85 in a powerline right of way approximately 2,000 feet north-northwest of the intersection of Shannon Bradley Road and Crescent Lane (Corridor Segment H2A – DSAs 4, 5, 9,22, 23, and 27) in Gaston County. The preliminary design in Corridor Segment H2A and the refined preliminary design for the Preferred Alternative (Alternative 9) do not encroach on this population of Georgia aster.</p> <p>Updated protected plant species surveys were conducted in 2010, as summarized in Section 3.4 of the ROD. As discussed in this section, the area where the population of Georgia aster was found in 2005 was revisited and the site had been mowed. The population of Georgia aster is no longer present.</p>

Appendix C1 – Agency Comments

Table C1-5: NCDENR Office of Conservation, Planning, & Community Affairs – Natural Heritage Program

Document: a005 letter dated Feb 8, 2011

COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
4	Protected Species and Wildlife	The portion of the project area southeast of Gastonia comes very close to a Catawba Lands Conservancy easement, totaling 152 acres (see enclosed map). This managed/conservation area is perhaps surprisingly not portrayed on the project maps (Figures 1-4a, 1-5a, and 1-5b).	The Catawba Land Conservancy easement is shown in relation to the Preferred Alternative in Final EIS Figure 2-3l. The preliminary design for the Preferred Alternative would avoid encroaching on the easement.
5	Protected Species and Wildlife	In summary, the Program cannot support Alternative 9, the Recommended Alternative, because it would most likely impact or destroy the Stagecoach Road Granitic Outcrop natural area. The Natural Heritage Program prefers Alternative 23 or Alternative 27 as the alternatives that would least impact the Stagecoach Road Granitic Outcrop, the Schweinitz's sunflower population, the Catawba Lands Conservancy easement, and Crowders Mountain State Park. The population of Georgia aster might be impacted by Alternatives 23 or 27, but these two routes clearly avoid the granitic flatrock.	The Preferred Alternative preliminary design right of way would avoid the Stagecoach Road Granitic Outcrop, passing to the west of the outcrop, as shown in Final EIS Figure 2-3f. As shown in Final EIS Figure 2-3l, the Preferred Alternative preliminary design right of way would not encroach on the Catawba Land Conservancy easement. The Preferred Alternative is one of the DSAs farthest from Crowders Mountain State Park. Regarding the Schweinitz's sunflower, the Preferred Alternative has a biological conclusion of No Effect (Final EIS Section 2.5.4.5 and letter a014 from USFWS in Appendix B1). As discussed in response to Comment 4 of this letter (letter a005), the population of Georgia aster no longer exists.

NORTH CAROLINA STATE CLEARINGHOUSE
DEPARTMENT OF ADMINISTRATION
INTERGOVERNMENTAL REVIEW

a006

COUNTY: GASTON
MECKLENBURG

F02: HIGHWAYS AND ROADS

STATE NUMBER: 11-E-4220-0166
DATE RECEIVED: 01/12/2011
AGENCY RESPONSE: 02/09/2011
REVIEW CLOSED: 02/14/2011



MS RENEE GLEDHILL-EARLEY
CLEARINGHOUSE COORDINATOR
DEPT OF CULTURAL RESOURCES
STATE HISTORIC PRESERVATION OFFICE
MSC 4617 - ARCHIVES BUILDING
RALEIGH NC

EP 02-9723

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DEPT OF TRANSPORTATION

Dis 1/28/11 A - 1/26/11 JM document address concerns cleared

PROJECT INFORMATION

APPLICANT: N.C. Turnpike Authority
TYPE: National Environmental Policy Act
Final Environmental Impact Statement

Dis 2/9/11 S



DESC: Gaston East-West Corridor: Improvements to east-west transportation mobility in the area around Gastonia and other towns in southern Gaston and western Mecklenburg counties; TIP U-3321

CROSS-REFERENCE NUMBER: 03-E-4220-0304 09-E-4220-0322

The attached project has been submitted to the N. C. State Clearinghouse for intergovernmental review. Please review and submit your response by the above indicated date to 1301 Mail Service Center, Raleigh NC 27699-1301.

If additional review time is needed, please contact this office at (919)807-2425.

AS A RESULT OF THIS REVIEW THE FOLLOWING IS SUBMITTED: NO COMMENT COMMENTS ATTACHED

SIGNED BY: Renee Gledhill-Earley DATE: _____

1 | Document accurately outlines cultural resources and effects. 2/9/11

JAN 14 2011

Appendix C1 – Agency Comments

Table C1-6: NC Department of Cultural Resources State Historic Preservation Office

Document: a006 letter dated Feb 9, 2011

COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
1	Historic and Archaeological Resources	Document accurately outlines cultural resources and effects.	Comment noted.



North Carolina Department of Environment and Natural Resources
Division of Environmental Health

a007

Beverly Eaves Perdue
Governor

Terry L. Pierce
Director

Dee Freeman
Secretary

Memorandum

Date: January 28, 2011
To: Jim McRight, Environmental Review Coordinator
Public Water Supply Section
Raleigh Central Office
From: Britt Setzer, Regional Supervisor
Public Water Supply Section
Mooresville Regional Office
Subject: Project Review Response
Final EIS – Gaston East-West Corridor Study
Project Number 11-0166, Mecklenburg/Gaston County

1 There may be situations encountered where land is not available for a new well site, or the site can't be approved by the PWS Section. In these cases, municipal water may need to be extended to the area to serve the impacted water system.

Another point to consider is the proposed right-of-way for the road. The road right-of-way cannot encroach on an existing community or NTNC well site either.

Any TNC well sites encountered and need of relocation would need approval by the Gaston County Environmental Health Department.

Water distribution systems associated with community well water systems and municipal water systems may be impacted by the project. As is stated in the EIS, these type issues need to be coordinated with the water system owners and may involve either local or NCDENR-PWS Section approval prior to the relocation.

Thanks for the opportunity to comment. I felt additional clarification was warranted for the NC Turnpike Authority. Hopefully this will help prevent water supply related issues if this project starts in the future.

If you have any questions, please call me at 704-235-2127.

A review of these documents was conducted on January 27, 2011. I feel additional clarification is needed to the response to some of my comments in Table B1-8 on Page B1-25.

The NC Rules Governing Public Water Systems (RGPWS) Title 15A Subchapter 18C is the administrative code that all public water supply systems are required to comply with in this state. By definition, a public water system means a system for the provision to the public of water for human consumption if such system has at least 15 service connections or regularly serves on an average 25 individuals daily at least 60 days out of the year. The definitions can be viewed in Section .0100 of the RGPWS. The web page link is <http://www.deh.enr.state.nc.us/pws/rules/contents.htm>.

1 A public water system can be a community, nontransient-noncommunity (NTNC) or transient non-community (TNC) well or surface water system. For this project area, the primary concern will be the well water systems. An example of a community well system would be a subdivision or mobile home park served by a single well or multiple wells depending on the population. Examples of NTNC well systems would be a daycare, school or small business. An example of a TNC well system would be a church, quick stop or restaurant.

If any community or NTNC well is impacted by this project and must be relocated, a new well site must be provided to the water system owner that can be approved by the Public Water Supply (PWS) Section prior to drilling and meet the requirements of RGPWS Section .0203, .0300 and .0400. These rules can be viewed at the web page link listed above. The well sites must have a minimum of a 100 foot radius around the proposed well that is owned or controlled by the water system owner.



Appendix C1 – Agency Comments

Table C1-7: NC Department of Environment and Natural Resources – Division of Environmental Health

Document: a007 letter dated January 28, 2011

COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
1	Water Resources	<p>I feel additional clarification is needed to the response to some of my comments in Table B1-8 on page B1-25.</p> <p>The <u>NC Rules Governing Public Water Systems (RGPWS)</u> Title 15A Subchapter 18C is the administrative code that all public water supply systems are required to comply with in this state. By definition, a public water system means a system for the provision to the public of water for human consumption if such system has at least 15 service connections or regularly serves on an average 25 individuals daily at least 60 days out of the year. The definitions can be viewed in Section .0100 of the RGPWS. The web page link is http://www.deh.enr.state.nc.us/pws/rules/contents.hrm.</p> <p>A public water system can be a community, nontransient-noncommunity (NTNC) or transient noncommunity (NTC) well or surface water system. For this project area, the primary concern will be the well water systems. An example of a community well system would be a subdivision or mobile home park served by a single well or multiple wells depending on the population. Examples of NTNC well systems would be a daycare, school or small business. An example of a TNC well system would be a church, quick stop or restaurant.</p> <p>If any community or NTNC well is impacted by this project and must be relocated, a new well site must be provided to the water system owner that can be approved by the Public Water Supply (PWS) Section prior to drilling and meet the requirements of RGPWS Section .0203, .0300 and .0400. These rules can be reviewed at the web page link listed above. The well sites must have a minimum of a 100 foot radius around the proposed well that is owned or controlled by the water system owner.</p> <p>There may be situations encountered where land is not available for a new well site, or the site can't be approved by the PWS Section. In these cases, municipal water may need to be extended to the area to serve the impacted water system.</p> <p>Another point to consider is the proposed right-of-way for the road. The road right-of-way cannot encroach on an existing community or NTNC well site either.</p> <p>Any TNC well sites encountered and in need of relocation would need approval by the Gaston County Environmental Health Department.</p>	<p>Thank you for this additional clarification. The NCTA will comply with all rules and regulations regarding impacts to water supply wells and will coordinate with the NCDENR Public Water Supply Section, the Gaston County Environmental Health Department, and the Mecklenburg County Groundwater and Wastewater Services Program as applicable.</p>



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

February 22, 2011

Ms. Jennifer Harris, P.E.
North Carolina Turnpike Authority
North Carolina Department of Transportation
5400 Glenwood Avenue, Suite 400
Raleigh, North Carolina 27612

SUBJECT: Gaston East-West Connector, I-85 to I-485 and NC 160, Gaston and Mecklenburg Counties, Final Environmental Impact Statement (FEIS); TIP No.: U-3321; FHW-E40827-NC; CEQ No.: 20110011

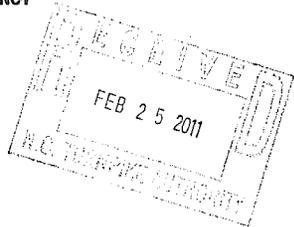
Dear Ms. Harris:

The U.S. Environmental Protection Agency (EPA) Region 4 NEPA Program Office has reviewed the subject document for in accordance with Section 309 of the Clean Air Act and Section 102(C) of the National Environmental Policy Act (NEPA). The North Carolina Turnpike Authority (NCTA) and the Federal highway Administration (FHWA) are proposing to construct an approximate 22-mile, multi-lane, median-divided toll facility from I-85 west of Gastonia to I-485/NC 160 in Gaston and Mecklenburg Counties, North Carolina.

EPA provided detailed comments on the Draft Environmental Impact Statement (DEIS) on July 17, 2009. EPA rated the twelve (12) detailed study alternatives (DSAs) as "EO-2", Environmental Objections with additional information being requested in the final document. Subsequent to this letter, EPA staff has continued with work with the transportation agencies and other NEPA/Section 404 Merger process agencies on environmental issues, including air quality and transportation conformity, avoidance and minimization measures to jurisdictional waters of the U.S., and conceptual mitigation plans.

NCTA and FHWA provided responses to EPA's DEIS comment letter in Volume 2 of the FEIS, pages B1-39 to B1-63. NCTA and FHWA provided a Conceptual Mitigation Plan by reference to a project webpage and a general summary of the plan in the FEIS. EPA's detailed technical comments on the FEIS and the referenced reports are included in Attachment 'A' (See attached).

EPA recognizes that additional avoidance and minimization measures are currently being proposed by the transportation agencies. However, the initial preliminary designs were atypical for most new location, multi-lane, median-divided highway projects in North Carolina that resulted in much greater DEIS impacts to jurisdictional waters of the United States than other similarly scoped projects. Furthermore, EPA understands that the transportation agencies are now proposing to phase the project and



3 | change the typical section. The section in western Gaston County from I-85 to US 321 or approximately half the project length will be initially constructed as a two-lane facility. Although many of the DEIS comments were addressed, EPA has remaining environmental concerns regarding direct impacts to jurisdictional streams and wetlands including 303(d) listed impaired waters, indirect and cumulative impacts to jurisdictional resources, potential Environmental Justice impacts to minority and low-income populations, long-term impacts from Mobile Source Air Toxics to nearby neighborhoods and communities, impacts to Voluntary Agricultural Districts, and impacts to terrestrial
4 | forests and wildlife habitat. EPA also maintains its concerns regarding the ability of the transportation agencies to provide reasonable and functionally equivalent mitigation for water resources impacts within the project study area.

To address these remaining issues, EPA recommends that the transportation agencies provide additional information to the review agencies and the public prior to the issuance of a Record of Decision (ROD). The supplemental information should further address the key issues in the attachment, including compensatory mitigation to direct impacts to jurisdictional streams and wetlands including 303(d) listed impaired waters, potential environmental enhancements to address indirect and cumulative impacts to jurisdictional resources, potential Environmental Justice impacts to minority and low-income populations and provide for a thorough analysis, and long-term impacts from Mobile Source Air Toxics to nearby neighborhoods and communities and a site-specific quantitative analysis. The supplemental information might also include specific project commitments concerning impacts to Voluntary Agricultural Districts and opportunities for safe wildlife passage to minimize fragmentation effects from the new multi-lane facility.
5 |

Should you have any questions concerning these comments or recommendations, please contact Mr. Christopher Militscher of my staff at 919-856-4206.

Sincerely,

Heinz J. Mueller, Chief
NEPA Program Office

Cc: G. Conti, NCDOT
J. Sullivan, FHWA
S. Melendon, USACE
C. Sullins, NCDWC

Attachment A
FEIS Detailed Review Comments
Gaston East-West Connector Toll Facility
Mecklenburg and Gaston Counties
U-3321

General Comments to the FEIS

6 Chapter 1 of the FEIS includes the Draft EIS Summary and Updates, from pages 1-1 to 1-55. Based upon EPA's review, there is no mention of the petition signed by more than 7,000 citizens opposed to the project in this summary chapter. One of the main purposes of preparing an Environmental Impact Statement is to potentially address public controversy. Considering this petition and the hundreds of written responses following the public hearings, the NCTA and FHWA have chosen not to fully address the controversial issues identified during the NEPA process. The exclusion of specifically addressing this citizens' petition and other letters of opposition in the summary chapter of the FEIS appears to be inconsistent with other large scope toll projects currently being advanced by the transportation agencies (e.g., Raleigh Southern Outer Loop or Triangle Southeast Extension Connector and the "Red Alternative" and the Town of Garner).

7 Chapter 3, Section 3.3, includes more information regarding the comments from the general public. In addition to the approximate 7,000-person petition, NCTA and FHWA also received 275 signatures submitted by the Harrison family opposed to the project and 109 signatures submitted by Barbara Hart opposed to one segment of the project. Of the other 15 public comment letters received, 14 are opposed to the project and one is 'neutral'.

8 The generalized concerns expressed by the public and other agencies are included on pages 3-8 to 3-10. EPA does not believe that the generalized responses that NCTA provided to most of these key concerns from the public help to address the controversial issues associated with this proposed toll project.

9 As a general comment regarding the format of the DEIS and now the FEIS, EPA strongly encourages consistency. FHWA and NCDOT have produced dozens of EISs in the last ten years. Based upon the professional judgment of the principle NEPA reviewer, most all of them are very readable and information is easy to locate within the standard format specified in the CEQ regulations. NCTA and FHWA have developed their specific format that is less readable and more difficult to find information. For example, under Farmland impacts Section 1.3.2.3, the discussion does not specifically identify what the direct impacts to agricultural lands are from the Preferred Alternative, DSA 9.
10 Furthermore, the comments concerning land use plans: "...which designate southern Gaston County as an area targeted for more suburban development" and the "area surrounding the proposed project is slated for suburban development" appear to be

10 provided as a rationalization for sprawl and justification for impacting farmlands, including designated Voluntary Agricultural District (VAD) properties. These projections do not appear to be consistent with the finding and future development trends identified in the Indirect and Cumulative Effects section. All NCDOT EISs reviewed by
11 EPA in the last ten years or more contain a summary table of key impacts at the end of Chapter 1. The Gaston East-West Connector FEIS does not contain a summary table but gives much greater narrative discussions that often reiterate what was already addressed
12 in the DEIS or frequently refer the reader back to the DEIS. Direct impacts to key human and natural resource impacts for DSA 9 need to be gleaned from numerous pages of written text in the FEIS. See also <http://ceq.hss.doe.gov/nepa/regs/ceq/1500.htm#1500.4>.

The NCTA is now part of the NCDOT which utilizes the NEPA/Section 404 Merger process. From EPA's understanding, NCTA has been requested by both FHWA and the USACE to utilize the Merger process for turnpike projects. The NCTA, with the exception of the Gaston East-West Connector, utilizes the 'Section 6002 TEAC' process for its proposed turnpike projects. NCDOT and other participating agencies refer to interagency coordination meetings as 'Merger concurrence meetings'. The FEIS on page 1-42 under Terrestrial Wildlife refers to a 'TEAC meeting' held on April 8, 2008. Similarly, the FEIS on page 1-35 refers to 'TEAC meetings' conducted on February 5, March 4, and again April 8, 2008. From EPA's understanding these were Merger team meetings. EPA is unaware of a TEAC plan that was provided by NCTA for this NEPA/Section 404 Merger project. More importantly, the tentative commitment with NCWRC, USFWS and EPA for providing wildlife passages to address habitat fragmentation issues during final design is not included on Table PC-1, Special Project Commitments. The cost of additional wildlife passages can be substantial. The comment on page 1-43 concerning the NCTA commitment for bridge design to be 'wildlife friendly', when feasible, is left technically undefined.

FEIS Responses to EPA DEIS Comments

Comment #2: Regarding EPA's past concurrences during the NEPA/Section 404 Merger process, EPA refers NCTA and FHWA to the 2005 Memorandum of Understanding (MOU) under Applicability, Section B and Concept of Concurrence. EPA is both a regulatory or resource agency depending upon the specific statute. Prior to the issuance of the DEIS, the regulatory issues associated with the revocation of the N.C. State Implementation Plan (SIP) were generally unknown to NCTA, FHWA and the EPA Merger project team member. Regarding Clean Water Act requirements and the substantial impacts to jurisdictions waters of the U.S., EPA requested information on a conceptual mitigation plan prior to the issuance of the DEIS. The DEIS did not contain a conceptual mitigation plan for the unavoidable impacts to jurisdictional streams and wetlands, including potentially 48,995 linear feet of streams. Miles of these impacted streams were included on the Section 303(d) list of impaired waters.

16 EPA believes that there is a significant difference between the Merger team process and the Section 6002 'TEAC process'. The Merger team process includes a defined MOU, distinct agency roles and responsibilities, a dispute resolution and

16 elevation process, a glossary of terms and environmental statutes, and very detailed steps and milestones to reach concurrence points. More importantly, the Merger process was developed as a collaborative, problem-solving team process with the permitting and participating agencies. The Section 6002 TEAC process is primarily based on the coordination plan and the concept of agencies 'raising objections' within 30 days of a NCTA proposal. This difference is evident for the Gaston East-West Connector project as most of the meetings were not truly conducted and held as typical Merger concurrence point meetings but as Section 6002 TEAC meetings. Under the Section 6002 TEAC process, written concurrence from other agencies except the USACE for the selection of the LEDPA is not requested nor required.

17 An example of the difference is evidenced by the changed nature of the proposed project. This new toll facility was initially advanced in 2001 by the NCDOT as a freeway under the Merger process. In 2005, it was then promoted as a candidate toll facility. However, it was still being described as a multi-lane, Strategic Highway Corridor (SHC) 'freeway' meant to divert traffic off of Interstate 85 and to facilitate truck traffic from/to the Charlotte Douglas Airport. Following the issuance of the DEIS, the transportation agencies are now describing this regional connector 'freeway' in the FEIS as a phased project with approximately half of the length build as two lanes with right of way for possibly more lanes in the future. EPA refers the transportation agencies to page 2 of the MOU (Concept of concurrence: Examples of a reevaluation on concurrence might include a change in the assumptions on which the project purpose and need was based). The need to construct a multi-lane freeway facility west of US 321 to I-85 is a potential change to the original assumptions on the purpose and need for the project. EPA was not contacted by NCTA or FHWA between the DEIS and FEIS for a discussion as to whether a reevaluation of concurrence was potentially needed by proposing to build just two lanes initially for approximately half the project length.

18 Regarding Responses to EPA's comments on the DEIS, some of the NCTA and FHWA responses included from pages B1-46 to B1-63 are not fully responsive or defer to the DEIS information. The responses to EPA's comments #27, # 28 and #29 on Mobile Source Air Toxics (MSATs) are not considered by EPA to be fully responsive. NCTA and FHWA continue to rely on interim guidance and updated interim guidance. The statement on page B1-58, "Monitoring of MSAT emissions remains problematic for federally funded highway projects, and FHWA has only agreed to monitoring in a very limited way on past projects", does not disclose the technical rationale for monitoring on past selected projects. The MSAT information contained in Appendix D does provide a further rationale why FHWA does not conduct quantitative MSAT analyses. The closing statement in this appendix states: "Consequently, the results of such assessments would not be useful to decision-makers, who would need to weigh this information against project benefits, such as reducing traffic congestion, accident rates, and fatalities plus improved access for emergency response, that are better suited for quantitative analysis." The project's purpose and need does not include documentation of problems with accident rates, safety, or the need for improved access for emergency response on existing I-85 or parallel routes between Gastonia and Charlotte. Furthermore, based upon
19 the Travel Demand Model for the design year, the level of service (LOS) is actually

19 worse on I-85 with the proposed Gaston East-West Connector than without. Building 21.9 mile, new multi-lane facility will not provide the 'benefits' identified in this statement. Considering the location of this project and its rural and suburban setting, and that overall air quality is already compromised from ozone and 2.5 microns of particulate matter (PM2.5), EPA's request to perform a more robust analysis of MSATs, especially
20 with respect to near roadway sensitive receptors, is not inconsistent with current FHWA interim guidance.

FEIS Environmental Commitments

21 Under Special Project Commitments ("Green Sheets"), EPA does not understand Items 1, 5, and 7, including Community Resources and Services (sharing information with Regional public schools), Community Safety (bridge over the Catawba River and future design accommodations for pedestrian/bicycle), and Farmland (NCTA will work with Gaston County regarding public hearings related to land condemnation proceedings against the VAD parcels prior to right of way acquisition). The environmental
22 commitment made to FWS, NCWRC and EPA concerning adequate wildlife passage where there is substantial habitat fragmentation is not included in Table PC-1. There is
23 no reference to an environmental commitment to continue to work with impacted Environmental Justice neighborhoods and communities. There is no reference to continue
24 coordination efforts with the BEP and permitting agencies to obtain acceptable compensatory mitigation for direct impacts to jurisdictional streams and wetlands. Item
25 #18, Water Resources, developing a soil erosion and sedimentation plan and working with permitting agencies on BMPs does not include an specific environmental commitments.

Direct Impacts to Streams and Wetlands

26 EPA continues to have environmental concerns for the magnitude of impacts to jurisdictional streams and wetlands resulting from the preferred alternative (and Least Environmentally Damaging Preferred Alternative - LEDPA). EPA's representative to the Merger team abstained from concurrence on the LEDPA. Recognizing the efforts to provide design refinements to the Preferred Alternative DSA 9, the direct impacts to jurisdictional streams for a 21.9-mile facility are one of the highest in the past ten years of the NEPA/Section 404 Merger process. DSA 9 currently includes 36,416 linear feet of total impact to streams (approximately 6.9 miles), 7.02 acres of impact to wetlands, 4.5 acres of impacts to ponds, and 91 individual stream crossings.

27 The FEIS states on page I-43 that EPA also participates in the permitting process concerning waters of the U.S. and jurisdictional issues. Under Section 404(h)(1) of the Clean Water Act, the U.S. Fish and Wildlife Service also directly participates in the permitting process through its direct authorities under the Fish and Wildlife Coordination Act of 1934. The NEPA/Section 404 Merger 01 Guidance manual includes a glossary of laws related to the process that could be helpful to the NCTA and FHWA in identifying the agencies that have a participating role in the permitting processes (See also <http://water.epa.gov/lawsregs/guidance/wetlands/sec404.cfm>).

28 EPA recognizes that avoidance and minimization measures were addressed by NCTA and FHWA during Merger Concurrence Point 4A. Even with avoidance and minimization measures accepted by the Merger team agencies, the 36,416 linear feet of total stream impact is the single largest project impact since the inception of the NEPA/Section 404 Merger process. For this reason and the general lack of mitigation opportunities in the watersheds around Charlotte for Piedmont streams, EPA staff began requesting a Conceptual Mitigation Plan several years before the issuance of the DEIS.

Conceptual Mitigation Plan

The NCTA's Conceptual Mitigation Plan dated June 29, 2010, was included as a referenced document in the FEIS. A generalized summary is included in Section 2.5.4.4 and page 1-43 of the FEIS. Sections 1.0 to 6.0 contain background information and the general information that was presented at the multi-agency meeting on March 16, 2010. Appendix A of the report includes impacts to jurisdictional resources and Appendix C provides a project atlas for potential on-site, adjacent and nearby mitigation opportunities.

29 Based upon the assessment provided in the report, EPA concurs that the three (3) potential mitigation sites (Sites 1, 2 and 3) comprising seven (7) parcels are viable opportunities for compensatory mitigation. EPA also generally concurs that there is potential opportunity for some stream mitigation credit at the existing Beaverdam Creek mitigation site which is located in Mecklenburg County southwest of the future interchange connection at I-485. However, of the 14.0 Wetland Mitigation Units (WMUs) and 58,066 Stream Mitigation Units (SMUs) of perennial streams, 4,039 SMUs for intermittent important streams and 1,672 SMUs for intermittent unimportant streams required for DSA 9, a majority of the impacts are located in southern Gaston County and Catawba 01 (HUC 03050101). All of the Environmental Enhancement Program (EEP) assets shown in Exhibit 1, Page 8 of the report with the exception of the Beaverdam Creek mitigation site are located substantially far from the Catawba 01 and in other counties. According to NCDWQ representatives, these EEP assets may also be functionally different kinds of streams than those being impacted in the project study area. Based upon EPA's estimation, some of these EEP asset sites are located more than forty (40) miles from the project study area.

31 Regarding the potential storm water control locations and opportunities for mitigation credits, EPA does not concur that these locations and possible activities shown in Table 8, page 20 of the report should be for direct Section 404 mitigation credits. Due to the existing degraded conditions of several main water courses in the project study area, including Abernathy Creek, Crowder's Creek and Catawba Creek (per the Final 2006 303(d) list), and the projected Indirect and Cumulative Effects (ICE) from development resulting from the project, these protective measures from increased stormwater should be investigated and made regardless of potential mitigation credits. Of the 6 BMP sites listed on page 20 of the report, no existing stormwater controls are present at two of the sites (i.e., #1 and #6). Regarding BMP site #3, EPA cannot identify

32 from the description provided what the existing stormwater control is. The stormwater flow off the roof and parking lot is directed into an outflow pipe along the property line ending at a headwater stream. Mitigation credit (SMUs) for stormwater controls and BMPS should be considered as additional protective measures and environmental enhancements to prevent further degradation to impaired waters being directly and indirectly affected by the proposed project. As stated in the March 16, 2010, meeting minutes, it is NCTA and FHWA policy not to mitigate for indirect and cumulative effects from their proposed projects. EPA believes that these stormwater initiatives and BMPs should be instituted as enhancements under Section 401 requirements.

33 Of the 43 sites where there is potential on-site, adjacent and nearby mitigation opportunities included in Appendix C of the report, only three (3) stream sites have been identified as having potential for more than preservation credits (i.e., Restoration potential). EPA prefers restoration and enhancement activities to strict preservation for compensatory mitigation credit. Preservation (43 out of 43 identified sites) of these stream sites could very possibly end up being a 'patchwork' of mitigation sites that do little to protect or enhance the watershed's overall quality.

34 With the exception of the Beaverdam Creek mitigation site and the 3 on-site mitigation opportunities previously identified (Dockery, Harrison, and Falls properties shown in Table 5, page 13), EPA does not concur with the report conclusions that there has been adequately identified compensatory mitigation for jurisdictional impacts to streams. EPA will continue to address this outstanding issue of the lack of adequate compensatory mitigation of the project's impacts through the USACE's Section 404 permitting process.

Direct Impacts to the Human Environment

35 The Preferred Alternative DSA 9 includes 344 residential relocations, 38 businesses, 1 farm, and 3 non-profit facilities. The proposed Monroe Bypass/Connector toll facility located on the other side of Charlotte which is also approximately 20 miles in length with numerous interchanges has 107 residential relocations. The Gaston East-West Connector has a magnitude (3 times) or more residential relocations than a similarly designed toll facility. Table 1-3 of the FEIS indicates that 25 neighborhoods and rural communities will be impacted by DSA 9.

36 Regarding Environmental Justice issues, EPA's comments on the DEIS remain unaddressed in the FEIS. EPA considers that the construction of a toll facility in areas where there are many block groups characterized as minority and low-income is a potential environmental justice issue that could be expected to have a disproportionately high and adverse impact. The FEIS did not provide further analysis to this issue but defers to its comments and determination in Section 3.2.5 of the DEIS. The discussion included in this section of the DEIS was and remains inadequate for the purposes of identifying or quantifying the actual direct impacts of the new toll road to minority or low-income populations.

Table 3-7 of the DEIS is titled "General Environmental Justice Evaluation for Toll Facility". This table contains mostly unsupported opinions and lacks a quantifiable analysis. The comment that, "All commuters, including low-income commuters, would have the option to use a non-toll alternative route, such as I-85", is contrary to the claimed 'benefits' that the public will obtain as a result of the new, uncongested route to Charlotte. Further statements in this section of the DEIS are also based upon opinions and not factual data and analysis (e.g., Page 3-27; *Neighborhoods in the Project Study Area could contain special groups, particularly low-income and minority populations*; and, *All DSAs would also directly mobile home parks, which could represent low-income populations*). Of the 344 residential relocations for DSA 9, Table 3-2 indicates that 97 are minorities. Of the 344 residential relocations for DSA 9, Table 3-3 indicates as many as 88 households are below the poverty level and represent 'low-income'. The evaluation of this data with respect to the project study area, the County or other defined population areas is not made in a comparative fashion. The 'raw demographic data' provided in these tables is not explored or fully discussed in Section 3.2.5 under Environmental Justice. The FEIS (or DEIS) did not include the potential thresholds for determining if the impacts were disproportionately high compared to area demographic data. EPA notes the response on page B1-59 of the FEIS concerning 21% of the Demographic Study Area being comprised of minorities and that DSA 9 has 28% of the 344 residential relocations. There is no specific reference to low-income population relocations in this response and how combined with minority populations this compares to demographic study data.

36

Of the 245 noise impacted receptors identified in Table 4.4 for DSA 9, there is no discussion as to how many of these impacted receptors are minority or low-income. Highway noise is also potentially a direct impact to low-income and minority populations.

EPA continues to maintain its concerns for the lack of a comprehensive, objective, and detailed Environmental Justice analysis for the proposed project. EPA requests that a more comprehensive and detailed Environmental Justice analysis be performed using updated U.S. Census data for the proposed project and that it be included in the supplemental information.

Other Project Direct Impacts and ICE

EPA continues to have environmental concerns regarding the impacts to farmlands including 146 acres of conversion from active agricultural lands and 1,084 acres of prime and important farmland soils (Table 1-5 of the FEIS). EPA is concerned about the loss of terrestrial forests (882 acres) and other greenspace (681 acres).

37

EPA continues to have environmental concerns regarding ICE. Table 1-8 of the FEIS includes the summary of potential for ICE by county. For DSA 9, the potential for accelerated growth and other indirect effects as a result of the project are characterized by NCTA and FHWA as "high". The proposed Gaston East-West Connector is expected to increase sprawl in the project study area and beyond, including parts of York County.

38

38 S.C. (Page 1-49). EPA requests a copy of the ICE Quantitative Analysis report when it becomes available.

Appendix C1 – Agency Comments

Table C1-8: United States Environmental Protection Agency Region 4 Atlanta

Document: a008 letter dated Feb 22, 2011

COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
1	Agency Coordination	<p>EPA provided detailed comments on the Draft Environmental Impact Statement (DEIS) on July 17, 2009. EPA rated the twelve (12) detailed study alternatives (DSAs) as “EO-2”, Environmental Objections with additional information being requested in the final document. Subsequent to this letter, EPA staff has continued with work with the transportation agencies and other NEPA/Section 404 Merger process agencies on environmental issues, including air quality and transportation conformity, avoidance and minimization measure to jurisdictional waters of the U.S., and conceptual mitigation plans.</p> <p>NCTA and FHWA provided responses to EPA’s DEIS comment letter in Volume 2 of the FEIS, pages B1-39 to B1-63. NCTA and FHWA provided a Conceptual Mitigation Plan by reference to a project webpage and a general summary of the plan in the FEIS. EPA’s detailed technical comments on the FEIS and the referenced reports are included in Attachment ‘A’ (See attached).</p>	<p>EPA has been involved throughout the NEPA/Section 404 Merger Process for this project and NCTA and FHWA appreciate EPA’s past and continued coordination. The project has been through Concurrence Point (CP) 1 (Purpose and Need), CP2 (Alternatives), CP2a (Bridging and Alignment Decisions), CP3 (Least Environmentally Damaging Practicable Alternative), and CP4a (Avoidance and Minimization). EPA concurred with Concurrence Points 1, 2, and 2a.</p> <p>For Concurrence Points 3 and 4a, EPA concurred conditionally but opted to abstain from signing the concurrence forms (Final EIS Appendix G). The EPA noted in a July 1, 2010 email, included in Final EIS Appendix G, that they continued to have environmental concerns regarding the ability to provide adequate compensatory mitigation for jurisdictional impacts to waters of the US. An abstention means the agency does not actively object to a concurrence point, but chooses not to sign the concurrence form. Further, the agency does not find that the project violates the laws and regulations under its purview, as the agency would have identified any issues through a non-concurrence and not an abstention. The merger process can continue and the agency agrees not to revisit the concurrence point subject to the guidance on revisiting concurrence points included in the Memorandum of Agreement that established the merger process.</p> <p>The Record of Decision includes an update to the Conceptual Mitigation Plan (Section 3.3) and the FHWA and NCTA are continuing to work with EPA and other environmental resource and regulatory agencies through the permitting process to develop mitigation.</p>
2	Water Resources	<p>EPA recognizes that additional avoidance and minimization measures are currently being proposed by the transportation agencies. However, the initial preliminary designs were atypical for most new location, multi-lane, median-divided highway projects in North Carolina that resulted in much greater DEIS impacts to jurisdictional waters of the United States than other similarly scoped projects.</p>	<p>The NCTA will continue to evaluate opportunities for avoiding and minimizing impacts through final design. The initial preliminary designs for the Detailed Study Alternatives meet AASHTO and NCDOT standards. As discussed in Final EIS Section 2.1.2, the typical section for the DSAs included six travel lanes and a 46-foot median in a typical right of way of 300 feet. This is similar to the typical section for I-540 on the north side of Raleigh, and is not atypical. The Draft EIS Section 2.3.1.3 notes that the six-lane typical section for the DSAs was developed based on the 2025 non-toll traffic forecasts and that the number of lanes would be reevaluated for the Final EIS.</p> <p>As described in Final EIS Section 2.1.2, the 2035 toll scenario traffic forecasts for the Preferred Alternative indicated that four through lanes were needed to carry projected traffic volumes at an adequate level of service in the design year. As a result, the proposed median also was reduced from 70 feet (which would be the median width under the original typical section if four lanes were constructed) to 50 feet.</p>

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			Section 2.3.3 and Table 2-2 of the Final EIS lists the changes in jurisdictional resources resulting from the refinements to the Preferred Alternative, including the change in typical section. The refined typical section was estimated to result in a reduction of impacts of 980 linear feet of perennial streams, 174 linear feet of intermittent streams, and 0.32 acres of wetlands.
3	Roadway Design	Furthermore, EPA understands that the transportation agencies are now proposing to phase the project and change the typical section. The section in western Gaston County from I-85 to US 321 or approximately half the project length will be initially constructed as a two-lane facility.	Like most large projects in North Carolina, the Gaston East-West Connector will be constructed in phases. Currently, an interim phase is proposed that will construct two lanes of the ultimate four-lane roadway from US 321 west to I-85. This is approximately 5.9 miles, or 27 percent, of the 21 mile long project. However, the ultimate project was evaluated in the Final EIS. The ultimate project is included in the GUAMPO's 2035 Long Range Transportation Plan to be completed by 2035.
4	Water Resources	EPA also maintains its concerns regarding the ability of the transportation agencies to provide reasonable and functionally equivalent mitigation for water resources impacts within the project study area.	A Conceptual Mitigation Plan has been prepared for the Preferred Alternative, including a discussion of on-site mitigation, as summarized in Final EIS Section 2.5.4.4. In addition, NCTA has received agreement from EEP to provide compensatory mitigation through the in-lieu fee program. Additional information and updates regarding on-site mitigation are included in the Record of Decision Section 3.3 . In June 2011, NCDOT acquired the Linwood Springs Golf Course property. Crowders Creek runs through this property, and restoration and enhancement of this creek segment will provide on-site mitigation for the project.
5	Various	The supplemental information should further address the key issues in the attachment, including compensatory mitigation to direct impacts to jurisdictional streams and wetlands including 303(d) listed impaired waters, potential environmental enhancements to address indirect and cumulative impacts to jurisdictional resources, potential Environmental Justice impacts to minority and low income populations and provide for a thorough analysis, and long-term impacts from Mobile Source Air Toxics to nearby neighborhoods and communities and a site-specific quantitative analysis. The supplemental information might also include specific project commitments concerning impacts to Voluntary Agricultural Districts and opportunities for safe wildlife passage to minimize fragmentation effects from the new multi-lane facility.	See responses to Comments 8 through 39 in this letter (letter a008).
6	Public Involvement	Chapter 1 of the FEIS includes the Draft EIS Summary and Updates, from pages 1-1 to 1-55. Based upon EPA's review, there is no mention of the petition signed by more than 7,000 citizens opposed to the project in this summary chapter. One of the main purposes of preparing an Environmental Impact Statement is to potentially address public controversy. Considering this petition and the hundreds of written responses following the public	Final EIS Chapter 1 is a summary of the Draft EIS. As described in the introduction to Final EIS Section 1.4 - Public Involvement and Agency Coordination: "The following information is summarized from Chapter 9 of the Draft EIS, which discuss public involvement and agency coordination activities prior to preparation of the Draft EIS. Public involvement and agency coordination activities since the Draft EIS was prepared are described in

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Table C1-8: United States Environmental Protection Agency Region 4 Atlanta

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		hearings, the NCTA and FHWA have chosen not to fully address the controversial issues identified during the NEPA process. The exclusion of specifically addressing this citizens' petition and other letters of opposition in the summary chapter of the FEIS appears to be inconsistent with other large scope toll projects currently being advanced by the transportation agencies (e.g., Raleigh Southern Outer Loop or Triangle Southeast Extension Connector and the "Red Alternative" and the Town of Garner).	<p>Chapter 3 of this Final EIS."</p> <p>Section 3.3.1 in Chapter 3 of the Final EIS includes details regarding the petitions received in opposition to the proposed project. The petition with 7,000 signatures stated "We the undersigned do not see that the proposed toll road known as the Garden Parkway will improve east-west transportation mobility in the area round the City of Gastonia, between Gastonia and the Charlotte metropolitan area, and we have no need for a toll road to establish direct access between southwest Gaston County and western Mecklenburg County WE ARE OPPOSED TO THE GARDEN PARKWAY AS PROPOSED IN THE DRAFT ENVIRONMENTAL IMPACT STATEMENT DATED APRIL 2009."</p> <p>The responses to generalized comments on purpose and need included in Section 3.3.2.1 of the Final EIS respond to the petition statement.</p> <p>All letters of opposition are included in Final EIS Appendix B, along with responses to individual comments.</p>
7	Public Involvement	Chapter 3, Section 3.3, includes more information regarding the comments from the general public. In addition to the approximate 7,000-person petition, NCTA and FHWA also received 275 signatures submitted by the Harrison family opposed to the project and 109 signatures submitted by Barbara Hart opposed to one segment of the project. Of the other 15 public comments letters received, 14 are opposed to the project and one is 'neutral'.	<p>The referenced petitions are discussed in Section 3.3.1 of the Final EIS. All comments received were considered both individually and collectively, and responses were provided to all comments in the Final EIS and ROD.</p> <p>The Gaston Urban Area Metropolitan Planning Organization (GUAMPO) and the Mecklenburg-Union MPO (MUMPO) have also provided opportunities for public involvement throughout their long range transportation planning processes, as described in the GUAMPO 2035 Long Range Transportation Plan (LRTP) (page 2-4) and the MUMPO 2035 LRTP (page 3-1). As an example of ongoing coordination, GUAMPO held a public meeting on February 7, 2011 about their long range transportation plans, and public comments received included comments about the Gaston East-West Connector. Appendix C4 of the ROD includes the public comments received on the proposed project at this GUAMPO meeting.</p> <p>Governmental agencies and Metropolitan Planning Organizations (MPOs) have had the opportunity to review public input provided on this project and their positions that this project is a top priority have not changed. The project remains a top priority in the Gaston Urban Area MPO (GUAMPO) 2035 Long Range Transportation Plan (LRTP) (see resolution dated March 22, 2011 in ROD Appendix C3).</p>
8	Public Involvement	The generalized concerns expressed by the public and other agencies are included on pages 3-8 to 3-10. EPA does not believe that the generalized responses that NCTA provided to most of these key concerns from the public help to address the controversial issues associated with this proposed toll project.	See response to Comment 5 in this letter (letter a008).

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Table C1-8: United States Environmental Protection Agency Region 4 Atlanta

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COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
9	Editorial	NCTA and FHWA have developed their specific format that is less readable and more difficult to find information. For example, under Farmland impacts Section 1.3.2.3, the discussion does not specifically identify what the direct impacts to agricultural lands are from the Preferred Alternative, DSA 9.	As discussed in Final EIS Preface Section P.3, the Final EIS uses a condensed format, which is described as an allowed format in FHWA Technical Advisory T6640.8A. This approach avoids repetition of material from the Draft EIS and allows the focus of the Final EIS to be on important changes that have occurred since the Draft EIS, comments received on the Draft EIS, responses to those comments, and new information that has been considered. FHWA believes that for this project, the condensed format for the Final EIS was the most appropriate format for aiding agencies, decision-makers, and the public in understanding the project and its impacts. Direct impacts from the Preferred Alternative refined preliminary design are summarized in Chapter 2 of the Final EIS. Section 2.5.2.3 discusses the impacts to farmland from the Preferred Alternative.
10	Farmland	Furthermore, the comments concerning land use plans: "...which designate southern Gaston County as an area targeted for more suburban development" and the "area surrounding the proposed project is slated for suburban development" appear to be provided as a rationalization for sprawl and justification for impacting farmlands, including designated Voluntary Agricultural District (VAD) properties. These projections do not appear to be consistent with the finding and future development trends identified in the Indirect and Cumulative Effects section.	The text regarding the County's land use plans is included to point out the County's ultimate vision for southern Gaston County, which is an area targeted for suburban development. It can be assumed the County will support policies and land use decisions that are consistent with their comprehensive land use plans. Voluntary Agricultural District (VAD) properties were considered and impacts avoided and minimized where feasible for all Detailed Study Alternatives, including the Preferred Alternative. The Preferred Alternative (DSA 9) is one of six DSAs that would impact the least acreage of VAD land. As stated in Final EIS Section 2.5.5.6 - Potential Indirect and Cumulative Effects to Land Use, "the substantial growth projected for the southeast portion of Gaston County (including the indirect land use effects of the proposed project) is largely consistent with local plans for Gaston County." This is true of both the No-Build and Build scenarios, as shown in Figures 2-7, 2-8, 2-9, and 2-10 in the Final EIS and in Figures 4, 5, 6, and 7 in the ROD. Under both the No-Build and Build Scenarios, growth in households and employment is projected for southeast Gaston County.
11	Editorial	All NCDOT EISs reviewed by EPA in the last ten years or more contain a summary table of key impacts at the end of Chapter 1.	The Draft EIS impact summary table is included in Final EIS Appendix C. An impact summary table for the Preferred Alternative refined preliminary design is included as Table 14 in the ROD. The key impacts considered in identifying the Preferred Alternative are discussed in Section 2.2 of the Final EIS.
12	Editorial	Direct impacts to key human and natural resource impacts for DSA 9 need to be gleaned from numerous pages of written text in the FEIS. See also http://ceq.hss.doe.gov/nepa/regs/ceq/1500.htm#1500.4 .	An impact summary table for the Preferred Alternative based on the refined preliminary design is included as Table 14 in the Record of Decision.

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COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
13	Agency Coordination	<p>The FEIS on page 1-42 under Terrestrial Wildlife refers to a 'TEAC meeting' held on April 8, 2008. Similarly, the FEIS on page 1-35 refers to 'TEAC meetings' conducted on February 5, March 4, and again April 8, 2008. From EPA's understanding these were Merger team meetings. EPA is unaware of a TEAC plan that was provided by NCTA for this NEPA/Section 404 Merger project.</p>	<p>NCTA holds regularly scheduled meetings called Turnpike Environmental Agency Coordination (TEAC) meetings where any of the NCTA's projects can be discussed. It was clear in these meetings that the Gaston East-West Connector was continuing in the Merger process, as demonstrated by the signed concurrence forms included in Draft EIS Appendix A-1 and Final EIS Appendix G. At various concurrence points, EPA participated by opting to either sign or abstain (with explanatory comments).</p> <p>The Draft EIS Section 9.2.3.1 states the following:</p> <p style="padding-left: 40px;">In 2005, when project administration was transferred to the NCTA, the NCTA decided that project coordination would continue with a process similar to the Merger 01 process, even though the NCTA is not a signatory to the MOA that created the Merger 01 process...The same agencies that were involved in the project as the NEPA/404 Merger Team would continue to participate as the Agency Coordination Team.</p> <p>The Section 6002 Coordination Plan was included as Appendix A-7 in the Draft EIS and clearly describes NCTA's intention to follow the Merger process and obtain agency signatures at each concurrence point. As listed in Table 9-2 of the Draft EIS, the EPA agreed to be a participating agency. As listed in Table 9-3 of the Draft EIS, meetings in February, March, and April 2008 were held to discuss Merger 01 concurrence point CP2a.</p> <p>As described in Draft EIS Section 9.2.3.2, draft versions of the Section 6002 coordination plan were shared with cooperating and participating agencies and discussed at TEAC meetings. The Section 6002 coordination plan was discussed at the meetings listed below. An EPA representative was present at each of these meetings. EPA did not provide any comments on the plan at the meetings or any written comments on the plan:</p> <p style="padding-left: 40px;">12/15/06 and 1/25/07 – Discussion on general coordination plan template; but noted in meetings that a decision on how to handle the Gaston East-West Connector project had not been made. The general coordination plan template was determined not applicable to the project.</p> <p style="padding-left: 40px;">2/5/08 – First discussion of developing a Section 6002-compliant version of NCDOT's Merger Process to use for the Gaston East-West Connector. At the time, NCDOT was also working on updating the Merger Process to comply with Section 6002. However, NCTA was an independent state agency and therefore not signatory to the Merger Process Memorandum of Agreement.</p> <p style="padding-left: 40px;">7/8/08 – Discussion about the draft project-specific Section 6002 Coordination Plan.</p>

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			<p>9/23/08 – Presentation of final draft of the project-specific Section 6002 Coordination Plan.</p> <p>10/7/08 – Section 6002 Coordination Plan approved by agencies. Minutes also note that agencies agreed that invitation letters for cooperating/ participating agencies were not needed and that they understood and accepted their status as participating agencies.</p> <p>The Final Section 6002 Coordination Plan includes the following text regarding Merger 01:</p> <p>1.2. Section 404/NEPA Merger 01 Process Information. This study, to the extent possible, will follow an environmental review process consistent with the requirements for “Projects on New Location” as described in the Section 404/NEPA Merger 01 Process Information with the following modifications:</p> <ul style="list-style-type: none"> • Agency Meetings. Turnpike Environmental Agency Coordination (TEAC) meetings will be held monthly at NCTA. These meetings serve the purpose of “merger meetings” under Merger 01, but are held more frequently.
14	Protected Species and Wildlife	More importantly, the tentative commitment with NCWRC, USFWS and EPA for providing wildlife passages to address habitat fragmentation issues during final design is not included on Table PC-1, Special Project Commitments.	The commitment to coordinate with the US Fish and Wildlife Service, US Environmental Protection Agency, and the NC Wildlife Resources Commission on the feasibility and the design of a wildlife passage at Stream S156 was included in the Draft EIS. This commitment was inadvertently left out of the Project Commitments included in the Final EIS. The project commitments included in the ROD list this commitment, and the omission from the Final EIS is noted in the Errata section of the Record of Decision.
15	Protected Species and Wildlife	The cost of additional wildlife passages can be substantial. The comment on page 1-43 concerning the NCTA commitment for bridge design to be 'wildlife friendly', <u>when feasible</u> , is left technically undefined.	In addition to the wildlife passage committed to for Stream S156 as listed in ROD Appendix A – Project Commitments , there would be other opportunities for wildlife crossings under proposed bridges.
16	Agency Coordination	EPA believes that there is a significant difference between the Merger team process and the Section 6002 'TEAC process'. The Merger team process includes a defined MOU, distinct agency roles and responsibilities, a dispute resolution and elevation process, a glossary of term and environmental statues, and very detailed steps and milestones to reach concurrence points. More importantly, the Merger process was developed as a collaborative, problem-solving team process with the permitting and participating agencies. The Section 6002 TEAC process is primarily based on the coordination plan and the concept of agencies 'raising objections' within 30 days of a NCTA proposal. This difference is evident for the Gaston East-	The Section 6002 coordination plan developed for the Gaston East-West Connector (included in Appendix A-7 of the Draft EIS) specifies that the project would follow the Section 404/NEPA Merger process. For more details, see response to Comment 13 in this letter (letter a008). Signed concurrence forms through Concurrence Point 4a are included in Appendix G of the Final EIS.

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		<p>West Connector project as most of the meetings were not truly conducted and held as typical Merger concurrence point meetings but as Section 6002 TEAC meetings. Under the Section 6002 TEAC process, written concurrence from other agencies except the USACE for the selection of the LEDPA is not requested nor required.</p>	
17	Agency Coordination	<p>An example of the difference is evidenced by the changed nature of the proposed project. This new toll facility was initially advanced in 2001 by the NCDOT as a freeway under the Merger process. In 2005, it was then promoted as a candidate toll facility. However, it was still being described as a multi-lane, Strategic Highway Corridor (SHC) 'freeway' meant to divert traffic off of Interstate 85 and to facilitate truck traffic from/to the Charlotte Douglas Airport. Following the issuance of the DEIS, the transportation agencies are now describing this regional connector 'freeway' in the FEIS as a phased project with approximately half of the length built as two lanes with right of way for possibly more lanes in the future. EPA refers the transportation agencies to page 2 of the MOU (<u>Concept of concurrence: Examples of a reevaluation on concurrence might include a change in the assumptions on which the project purpose and need was based</u>). The need to construct a multi-lane freeway facility west of US 321 to I-85 is a potential change to the original assumptions on the purpose and need for the project. EPA was not contacted by NCTA or FHWA between the DEIS and FEIS for a discussion as to whether a reevaluation of concurrence was potentially needed by proposing to build just two lanes initially for approximately half the project length.</p>	<p>As discussed in Section 9.2.3.3 of the Draft EIS, Concurrence Point 1 (Purpose and Need) was originally signed by the Merger Team, including EPA, on July 24, 2002. The project transitioned to the NCTA in 2005, and the project continued in the Merger Process. The intent to continue to follow the Merger Process is stated in the project's Section 6002 Coordination Plan. For details, see Response to Comment 13 in this letter (letter a008).</p> <p>After the project transitioned to the NCTA, an updated Purpose and Need Statement was prepared (October 15, 2008). The update was prepared because of several changes that had occurred since the original Purpose and Need Statement was prepared in 2002. These changes are listed in the Preface section of the Updated Purpose and Need Statement, and include the project being identified as a candidate toll facility, a travel demand model covering the entire Metrolina region became available, and traffic operations and projections were updated from 2025 to 2030 using the new travel demand model. None of the updates results in a substantive change to the original project purpose.</p> <p>An Addendum to the Final Alternatives Development and Analysis Report (October 15, 2008) also was prepared. The original Alternatives Development and Analysis Report was prepared in February 2007. As stated in the Addendum Preface, the addendum reassesses the previous alternatives development process, screening, and Detailed Study Alternative selection in the context of the project being advanced as a candidate toll facility. The Detailed Study Alternatives, which are multi-lane facilities on new location, did not change as a result of updated analysis included in the Addendum.</p> <p>Draft versions of the Updated Purpose and Need Statement and Addendum to the Final Alternatives Development and Analysis Report were discussed at TEAC meetings held on February 5, 2008, July 7, 2008 and September 23, 2008, all attended by a EPA representative. No substantive comments were received from the agency coordination team (Merger Team) on either document. The team, including EPA, agreed to resign Concurrence Point 1 and Concurrence Point 2 at the October 7, 2008 TEAC meeting. The Concurrence Form is included in Draft EIS Appendix A-1.</p>

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			<p>Following the issuance of the Draft EIS, the proposal to construct a multi-lane facility from I-485 to I-85 west of Gastonia did not change. However, as discussed in Section 2.1.2 of the Final EIS, the ultimate project typical section was reduced from six through lanes to four through lanes. The section from US 321 west to I-85 referred to in USEPA’s comment is still proposed to ultimately be a four-lane facility. This is the ultimate project configuration evaluated in the Final EIS. An initial construction phase currently proposed is to construct two lanes from US 321 west to I-85. The right of way needed for the ultimate project is intended to be purchased in the initial construction phase. The Gaston Urban Area Metropolitan Planning Organization’s <i>2035 Long Range Transportation Plan</i> includes the construction of the ultimate project by 2035.</p> <p>Because the ultimate project is still proposed to be a multi-lane facility by 2035, and there have been no substantive changes in the assumptions used in the Updated Final Purpose and Need Statement, there was no need to reevaluate concurrence or to contact cooperating and participating agencies regarding this subject.</p>
18	Air Quality	<p>Regarding Responses to EPA’s comments on the DEIS, some of the NCTA and FHWA responses included from pages B1-46 to B1-63 are not fully responsive or defer to the DEIS information. The responses to EPA’s comments #27, # 28 and #29 on Mobile Source Air Toxics (MSATs) are not considered by EPA to be fully responsive. NCTA and FHWA continue to rely on interim guidance and updated interim guidance.</p> <p>The statement on page B1-58, <i>"Monitoring of MSAT emissions remains problematic for federally funded highway projects, and FHWA has only agreed to monitoring in a very limited way on past projects"</i>, does not disclose the technical rationale for monitoring on past selected projects. The MSAT information contained in Appendix D does provide a further rationale why FHWA does not conduct quantitative MSAT analyses. The closing statement in this appendix states: <i>"Consequently, the results of such assessments would not be useful to decision-makers, who would need to weigh this information against project benefits. such as reducing traffic congestion, accident rates, and fatalities plus improved access or emergency response, that are better suited for qualitative analysis."</i> The project’s purpose and need does not include documentation of problems with accident rates, safety, or the need for improved access for emergency response on existing I-85 or parallel routes between Gastonia and Charlotte.</p>	<p>It is FHWA’s opinion that responses to Draft EIS comments 27, 28, and 29 are complete and responsive and do not require additional explanation.</p> <p>With regards to the statement on page B1-58, the opening sentence of the last section of Appendix D (Section D.3) states: <i>"This section is directly from Appendix C of the Interim Guidance Update on MSAT Analysis in NEPA Documents (FHWA, September 2009)."</i> The closing statement, then, is addressing highway projects in general, not the Gaston East-West Connector specifically. The closing statement offers examples of the potential benefits of highway projects in general. The Gaston East-West Connector purpose and need statement does address two of the example benefits listed; reducing traffic congestion and improved access.</p>

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19	Traffic and Travel Demand Modeling	Furthermore, based upon the Travel Demand Model for the design year, the level of service (LOS) is actually worse on I-85 with the proposed Gaston East-West Connector than without. Building 21.9 mile, new multi-lane facility will not provide the 'benefits' identified in this statement.	<p>Draft EIS Appendix C, Table C-2 lists the projected traffic volumes and levels of service along I-85 in the No-Build scenario and in the New Location Alternative Toll Scenario. The levels of service along I-85 are projected to be the same for most segments (LOS E or F) under both scenarios. The one difference is the segment between the Gaston East-West Connector interchange and Exit 13. Along this segment, I-85 would be improved as part of the interchange construction and would operate at LOS E in 2030 under the New Location Toll scenario. Under the No-Build scenario, this segment is projected to operate at LOS F.</p> <p>Year 2030 average daily traffic volumes forecasted along I-85 west of Exit 19 are slightly higher under the New Location Toll scenario compared to the No-Build Scenario, likely because traffic is traveling to/from the Gaston East-West Connector. East of Exit 19, year 2030 traffic volumes along I-85 are forecast to be less under the New Location Toll scenario.</p> <p>It should also be noted that the Gaston East- West Connector itself is projected to operate at LOS D or better in 2030, offering a less congested alternative route. Other benefits include improved east-west transportation mobility in the area around the City of Gastonia and the Charlotte metropolitan area, direct access between southeast Gaston County and western Mecklenburg County, and an overall reduction in congested travel in Gaston County.</p>
20	Air Quality	EPA's request to perform a more robust analysis of MSATs, especially with respect to near roadway sensitive receptors, is not inconsistent with current FHWA interim guidance.	<p>As stated in Appendix D of the Final EIS, "Air toxics analysis is a continuing area of research. While much work has been done to assess the overall health risk of air toxics, many questions remain unanswered. In particular, the tools and techniques for assessing project-specific health outcomes as a result of lifetime mobile source air toxic (MSAT) exposure remain limited. These limitations impede the ability to evaluate how the potential health risks posed by MSAT exposure should be factored into project-level decision-making within the context of the National Environmental Policy Act (NEPA).</p> <p>Nonetheless, air toxics concerns continue to be raised on highway projects during the NEPA process. Even as the science emerges, FHWA is duly expected by the public and other agencies to address MSAT impacts in their environmental documents. The FHWA, USEPA, the Health Effects Institute, and other have funded and conducted research studies to try to more clearly define potential risks from MSAT emissions associated with highway projects. The FHWA will continue to monitor the developing research in this emerging field.</p>

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			<p>While this research is ongoing, FHWA requires each NEPA document to qualitatively address MSATs and their relationship to the specific highway project through a tiered approach (Interim Guidance Update on Mobile Source Air Toxic Analysis in NEPA Documents, September 30, 2009).</p> <p>This approach is consistent and meets the requirements of 40 CFR 1502.22, which requires that "When an agency is evaluating reasonably foreseeable significant adverse effects on the human environment in an environmental impact statement and there is incomplete or unavailable information, the agency shall always make clear that such information is lacking."</p> <p>In FHWA's view, existing information is incomplete or unavailable to credibly predict the project-specific health impacts due to changes in MSAT emissions associated with a proposed set of highway alternatives. The outcome of such an assessment, adverse or not, would be influenced more by the uncertainty introduced into the process through assumption and speculation rather than any genuine insight in to the actual health impacts directly attributable to MSAT exposure associated with a proposed action.</p>
21	Community Characteristics and Resources, Farmland	Under Special Project Commitments ("Green Sheets"), EPA does not understand items 1, 5, and 7, including Community Resources and Services (sharing information with Regional public schools), Community Safety (bridge over the Catawba River and future design accommodations for pedestrian/bicycle), and Farmland (NCTA will work with Gaston County regarding public hearings related to <u>land condemnation proceedings against the VAD parcels</u> prior to right of way acquisition).	<p>Project Commitment 1 in Final EIS Table PC-1 ensures the NCTA will share information with the Gaston County Public Schools and Mecklenburg County Public Schools for the school system's planning purposes. As discussed in Final EIS Section 2.5.1.5, the Preferred Alternative could temporarily impact school bus routes during construction, and could modify existing routes and/or promote new bus routes. Also as discussed in Final EIS Section 2.5.1.5, Gaston County Schools was researching a new middle/high school campus location in the project area. Since this is not a regulatory issue, the project team wanted to ensure information was shared with the school systems.</p> <p>Project Commitment 5 in Final EIS Table PC-1 commits the NCTA to designing the Catawba River bridge such that pedestrian/bicycles facilities could be accommodated in the future if requested and funded by local jurisdictions. This means the bridge structure will be designed to be able to be reasonably modified to accommodate this feature. Several entities requested accommodations for bicycles/pedestrians on the bridges over the South Fork Catawba River and Catawba River in their comment letters on the Draft EIS. These include the MUMPO (letter g006 in Final EIS Appendix B2), Connect Gaston (letter i007 in Appendix B3), and Gaston Together (letter i008 in Appendix B3).</p> <p>Project Commitment 7 in Final EIS Table PC-1 is included to ensure NCTA complies with the local Gaston County Voluntary Agricultural District ordinance. The project team did not want to inadvertently overlook the requirements of this local</p>

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			ordinance during final design and right of way acquisition. The “condemnation” terminology is consistent with NCGS 106-740. This commitment is in no way intended to suggest that NCTA intends to condemn these lands before following the state’s normal right-of-way procedures.
22	Protected Species and Wildlife	The environmental commitment made to FWS, NCWRC and EPA concerning adequate wildlife passage where there is substantial habitat fragmentation is not included in Table PC-1.	This project commitment was inadvertently omitted from the Final EIS Project Commitments list. It has been added back in to the Project Commitments list in the Record of Decision.
23	Community Characteristics and Resources	There is no reference to an environmental commitment to continue to work with impacted Environmental Justice neighborhoods and communities.	Project Commitment 4 in Final EIS Table PC-1 states that if final design results in a direct taking of the Dixie Community Center on Garrison Road, NCTA will conduct additional coordination with the Garrison Road Community Center non-profit organization and provide mitigation for the loss of this facility.
24	Water Resources	There is no reference to continue coordination efforts with the EEP and permitting agencies to obtain acceptable compensatory mitigation for direct impacts to jurisdictional streams and wetlands.	The second paragraph of Final EIS Section PC – Special Project Commitments notes compliance with applicable federal and state requirements and regulations is required.
25	Water Resources	Item #18, Water Resources, developing a soil erosion and sedimentation plan and working with permitting agencies on BMPs does not include any specific environmental commitments.	Prior to construction, an erosion and sedimentation plan would be developed for the Preferred Alternative in accordance with applicable rules, regulations and guidance, including the latest version of the NCDENR publication <i>Erosion and Sediment Control Planning and Design Manual</i> . In addition, NCTA will require use of <i>Design Standards in Sensitive Watersheds</i> for all project areas. This is included as a project commitment.
26	Water Resources	Recognizing the efforts to provide design refinements to the Preferred Alternative DSA 9, the direct impacts to jurisdictional streams for a 21.9-mile facility are one of the highest in the past ten years of the NEPA/Section 404 Merger process.	The Piedmont region of North Carolina typically has more streams and less wetlands than the Coastal region of the state, resulting in higher stream impacts when compared to projects in the eastern part of the state. In addition, with most streams flowing in a north-south direction and this project traveling east-west, stream impacts are likely to be higher. Project elements and circumstances (typical section needed, alignment, geographic location, length, etc.) are unique to each project. The impacts of each Detailed Study Alternative were minimized to the extent practicable based on available data. Concurrence Point 2a – Bridging and Alignment Decisions to minimize impacts to jurisdictional resources was signed by the Merger Team, including the EPA, on October 7, 2008 (Draft EIS Appendix A-1). Jurisdictional impacts from the refined preliminary designs for the Preferred Alternative were further minimized to the extent practicable, as summarized in Final EIS Section 2.3.3. Concurrence Point 4a – Avoidance and Minimization – was signed on February 16, 2010 (Final EIS Appendix G). EPA concurred conditionally but opted to abstain from signing the concurrence form, noting in an email (included in Final EIS Appendix G) they had reservations concerning the ability to

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			<p>provide adequate mitigation for jurisdictional resources.</p> <p>An abstention means the agency does not actively object to a concurrence point, but chooses not to sign the concurrence form. The merger process can continue and the agency agrees not to revisit the concurrence point subject to the guidance on revisiting concurrence points included in the Memorandum of Agreement that established the merger process. Further, the agency does not find that the project violates the laws and regulations under its purview, as the agency would have identified any issues through a non-concurrence and not an abstention.</p> <p>The Record of Decision includes an update to the Conceptual Mitigation Plan (Section 3.3) and the FHWA and NCTA are continuing to work with EPA and other environmental resource and regulatory agencies through the permitting process to develop mitigation.</p>
27	NEPA Process	The NEPA/Section 404 Merger 01 Guidance manual includes a glossary of laws related to the process that could be helpful to the NCTA and FHWA in identifying the agencies that have a participating role in the permitting processes (See also http://water.epa.gov/lawsregs/guidance/wetlands/sec404.cfm).	See response to Comment 13 in this letter (letter a008). The Section 6002 Coordination Plan, incorporated by reference into the Final EIS, describes the process of identifying cooperating and participating agencies. This process was also described in Draft EIS Section 9.2.3.2. A listing of required permits, licenses and other government actions are included in Section S.10 of the Draft EIS.
28	Water Resources	Even with avoidance and minimization measures accepted by the Merger team agencies, the 36,416 linear feet of total stream impact is the single largest project impact since the inception of the NEPA/Section 404 Merger process. For this reason and the general lack of mitigation opportunities in the watersheds around Charlotte for Piedmont streams, EPA staff began requesting a Conceptual Mitigation Plan several years before the issuance of the DEIS.	<p>See response to Comment 26 in this letter (letter a008).</p> <p>A <i>Conceptual Mitigation Plan</i> was prepared for the Preferred Alternative, as summarized in Final EIS Section 2.5.4.4. Compensatory mitigation near the proposed project is available at EEP's Beaverdam Creek site located in the northern portion of Berewick District Park. In addition, in June 2011, NCDOT acquired the Linwood Springs Golf Course property for use as mitigation. This golf course is located near the western end of the project. It is described in more detail in Section 3.3 of this Record of Decision. NCTA is continuing to pursue additional onsite and nearby mitigation opportunities and will provide updated information in the permit application.</p>
29	Water Resources	Based upon the assessment provided in the report, EPA concurs that the three (3) potential mitigation sites (Sites 1,2 and 3) comprising seven (7) parcels are viable opportunities for compensatory mitigation.	In June 2011, NCDOT acquired the Linwood Springs Golf Course property. This golf course is located near the western end of the project and was identified as Site 1 in the <i>Conceptual Mitigation Plan</i> . It is described in more detail in Section 3.3 of this Record of Decision.

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30	Water Resources	All of the Environmental Enhancement Program (EEP) assets shown in Exhibit 1, Page 8 of the report with the exception of the Beaverdam Creek mitigation site are located substantially far from the Catawba 01 and in other counties. According to NCDWQ representatives, these EEP assets may also be functionally different kinds of streams than those being impacted in the project study area. Based upon EPA's estimation, some of these EEP asset sites are located more than forty (40) miles from the project study area.	<p>The preferred intent of the NCTA and the FHWA is to use the EEP's in-lieu fee payment program as the primary means of providing compensatory mitigation for the Gaston East-West Connector project.</p> <p>The EEP was established by the <i>Memorandum of Agreement Among the North Carolina Department of Environment and Natural Resources, the North Carolina Department of Transportation, and the US Army Corps of Engineers, Wilmington District</i> (July 22, 2003).</p> <p>EEP provides mitigation services on a watershed level basis as compensation for unavoidable environmental impacts associated with transportation infrastructure and economic development. EEP also focuses on detailed watershed planning and project implementation efforts within North Carolina's threatened or degraded watersheds.</p> <p>In accordance with the watershed-based approach, mitigation provided by EEP for a project can be provided in locations throughout the same 8-digit hydrologic unit. However, in order to address agency concerns, the NCTA and EEP agreed to investigate mitigation opportunities supplemental to or in addition to the typical EEP programmatic approach. In separate efforts, EEP has conducted a search for potential near-site opportunities and the NCTA has conducted a review of on-site mitigation and non-traditional mitigation opportunities, as documented in the <i>Conceptual Mitigation Plan</i>.</p> <p>In June 2011, NCDOT acquired the Linwood Springs Golf Course property. This golf course is located near the western end of the project and was identified as Site 1 in the <i>Conceptual Mitigation Plan</i>. It is described in more detail in Section 3.3 of this Record of Decision.</p>
31	Water Resources	Regarding the potential storm water control locations and opportunities for mitigation credits, EPA does not concur that these locations and possible activities shown in Table 8, page 20 of the report should be for direct Section 404 mitigation credits. Due to the existing degraded conditions of several main water courses in the project study area, including Abernathy Creek, Crowder's Creek and Catawba Creek (per the Final 2006 303(d) list), and the projected Indirect and Cumulative Effects (ICE) from development resulting from the project, these protective measures from increased stormwater should be investigated and made regardless of potential mitigation credits.	Comment acknowledged.

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32	Water Resources	Mitigation credit (SMUs) for stormwater controls and BMPs should be considered as additional protective measures and environmental enhancements to prevent further degradation to impaired waters being directly and indirectly affected by the proposed project. As stated in the March 16, 2010, meeting minutes, it is NCTA and FHWA policy not to mitigate for indirect and cumulative effects from their proposed projects. EPA believes that these stormwater initiatives and BMPs should be instituted as enhancements under Section 401 requirements.	NCTA will coordinate with NCDWQ to obtain the Section 401 Water Quality Certification and to identify the measures needed to be implemented in order to obtain the certification. NCTA will incorporate into the project design appropriate BMPs, including those from NCDOT's toolbox approved in January 2007 by NCDWQ for stormwater runoff.
33	Water Resources	EPA prefers restoration and enhancement activities to strict preservation for compensatory mitigation credit.	See response to Comment 3 in NCDWQ's letter (letter a003). NCTA is continuing to pursue additional on-site and near-site mitigation opportunities. Updates to the project's <i>Conceptual Mitigation Plan</i> are included in Section 3.3 of the ROD.
34	Water Resources	With the exception of the Beaverdam Creek mitigation site and the 3 on-site mitigation opportunities previously identified (Dockery, Harrison, and Falls properties shown in Table 5, page 13), EPA does not concur with the report conclusions that there has been adequately identified compensatory mitigation for jurisdictional impacts to streams. EPA will continue to address this outstanding issue of the lack of adequate compensatory mitigation of the project's impacts through the USACE's Section 404 permitting process.	Comment acknowledged. NCTA is continuing to pursue additional on-site and near-site mitigation opportunities and will provide updated information in the permit application.
35	Right-of-Way Acquisition and Relocation	The Preferred Alternative DSA 9 includes 344 residential relocations, 38 businesses, 1 farm, and 3 non-profit facilities. The proposed Monroe Bypass/Connector toll facility located on the other side of Charlotte which is also approximately 20 miles in length with numerous interchanges has 107 residential relocations. The Gaston East-West Connector has a magnitude (3 times) or more residential relocations than a similarly designed toll facility. Table 1-3 of the FEIS indicates that 25 neighborhoods and rural communities will be impacted by DSA 9.	Project elements and circumstances (typical section needed, alignment, geographic location, length, etc.) are unique to each project. For example, land uses and type/density/location of existing development differ. The Gaston East-West Connector project area also has numerous environmental and infrastructure constraints that influenced development of alternative corridors and designs, including the Charlotte-Douglas International Airport, existing interchanges on I-485, Berewick Regional Park, the Allen Steam Station, Catawba River and South Fork Catawba River, the Catawba Land Conservancy conservation easement along Catawba Creek, numerous historic resources on or eligible for the National Register of Historic Places, Crowders Mountain State Park, and existing interchanges along I-85. Relocations and impacts to neighborhoods were minimized to the extent practicable during development of the preliminary and Detailed Study Alternative corridors and during functional and preliminary design within the corridors. Preliminary corridors were established at 1,400 feet in width to provide flexibility in minimizing impacts during design activities. Relocations under the Preferred Alternative were in the lower end of the range of relocations from the Detailed Study Alternatives.

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36	Environmental Justice	<p>Regarding Environmental Justice issues, EPA's comments on the DEIS remain unaddressed in the FEIS. EPA considers that the construction of a toll facility in areas where there are many block groups characterized as minority and low-income is a potential environmental justice issue that could be expected to have a disproportionately high and adverse impact. The FEIS did not provide further analysis to this issue but defers to its comments and determination in Section 3.2.5 of the DEIS. The discussion included in this section of the DEIS was and remains inadequate for the purposes of identifying or quantifying the actual direct impacts of the new toll road to minority or low-income populations.</p> <p>Table 3-7 of the DEIS is titled "General Environmental Justice Evaluation for Toll Facility". This table contains mostly unsupported opinions and lacks a quantifiable analysis. The comment that, "All commuters, including low-income commuters, would have the option to use a non-toll alternative route, such as I-85" is contrary to the claimed 'benefits' that the public will obtain as a result of the new, uncongested route to Charlotte. Further statements in this section of the DEIS are also based upon opinions and not factual data and analysis....Of the 344 residential relocations for DSA 9, Table 3-2 indicates that 97 are minorities. Of the 344 residential relocations for DSA 9, Table 3-3 indicates as many as 88 households are below the poverty level and represent 'low-income'. The evaluation of this data with respect to the project study area, the county or other defined population areas is not made in a comparative fashion. The 'row demographic data' provided in these tables is not explored or fully discussed in Section 3.2.5 under Environmental Justice. The FEIS (or DEIS) did not include the potential thresholds for determining if the impacts were disproportionately high compared to area demographic data. EPA notes the response on page B1-59 of the FEIS concerning 21% of the Demographic Study Area being comprised of minorities and that DSA 9 has 28% of the 344 residential relocations. There is no specific reference to low-income population relocations in this response and how combined with minority populations this compares to demographic study data.</p> <p>Of the 245 noise impacted receptors identified in Table 4.4 for DSA 9, there is no discussion as to how many of these impacted receptors are minority or low-income. Highway noise is also potentially a direct impact to low-income and minority populations.</p> <p>EPA continues to maintain its concerns for the lack of a comprehensive, objective, and detailed Environmental Justice analysis for the proposed</p>	<p>EPA's comments regarding environmental justice are summarized and addressed below.</p> <ul style="list-style-type: none"> a. There may be potential environmental justice issues regarding construction of a toll facility in areas where there are many block groups characterized as minority or low-income. b. Table 3-7 of the Draft EIS – General Environmental Justice Evaluation for Toll Facility contains mostly unsupported opinions and lacks a quantifiable analysis. c. There is a need to identify and quantify the direct impacts of the toll facility on environmental justice populations, including low-income populations, and conduct a comparison to the study area, County, or other defined population area. d. Direct impacts to environmental justice populations should include an evaluation of highway noise. e. EPA requests a more comprehensive and detailed Environmental Justice analysis be performed using updated US Census data for the proposed project <p>Summary Item 'a'. Draft EIS Figures 3-3, 3-4, and 3-5 show the locations of minority and low-income populations in the Demographic Study Area. Generally, areas near DSA 9 (the Preferred Alternative) where there are concentrations of block groups with higher percentages of minorities (25 percent or more of the block group) and higher percentages of low-income populations (20 percent or more of the block group) occur at the western and eastern ends of the project. In west Gastonia there are block groups along Stagecoach Road (Block Groups 331001 and 332011) with low-income populations of 20 percent or more.</p> <p>As discussed in Draft EIS Section 3.2.5, minority communities identified as directly impacted by DSA 9 (the Preferred Alternative) include predominantly African-American neighborhoods at the western end of the project along Shannon Bradley Road between US 29/74 and I-85 (a group of subdivisions, including Matthews Acres, also referred to as the Broomfield community) and at the eastern end of the project in the Garrison Road community just west of I-485. These neighborhoods also are located in block groups with low-income populations of 10 percent or more.</p> <p>For the block groups along Stagecoach Road, the Preferred Alternative preliminary design and refined preliminary design both avoid the dense housing areas that are located primarily on the east side of Stagecoach Road that comprise the majority of the residential populations of the block groups. The Preferred Alternative</p>

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		<p>project. EPA requests that a more comprehensive and detailed Environmental Justice analysis be performed using updated U.S. Census data for the proposed project and that it be included in the supplemental information.</p>	<p>alignment is located to the west of Stagecoach Road in an area with much lower housing density (Final EIS Figures 2-3c-e).</p> <p>NCTA provided opportunities for input throughout the process and held outreach meetings with affected minority and low-income communities to discuss possible design changes to minimize impacts and mitigation opportunities to offset adverse effects. The Final EIS and ROD include a project commitment to conduct additional coordination with the Garrison Road Community Center non-profit organization and provide mitigation for the loss of this facility, if final design results in a direct taking of the facility. In addition, a project commitment has been added to the ROD that states NCTA will provide additional community outreach and take the necessary steps to effectively engage owners and tenants of the potentially low-income developments of Falls Estate, Levi Mobile Home Park (MHP), and Orion Oaks MHP during final design and right-of-way acquisition.</p> <p><u>Summary Item 'b'</u>. Draft EIS Table 3-7 addresses environmental justice issues that may arise specific to a toll facility. Issues listed in Draft EIS Table 3-7 are addressed below as they pertain specifically to the neighborhoods on the western and eastern ends of the project, and to the low-income populations in west Gastonia in the block groups along Stagecoach Road. As discussed below, construction of the Preferred Alternative as a toll facility would not create disproportionate impacts or denial of benefits to environmental justice communities.</p> <p><u>Non-Toll Alternatives</u>. The non-toll alternative to the proposed project is I-85 and I-485. These facilities are equitable to the proposed project in that they are controlled-access high-speed interstate facilities. For the Shannon Bradley Road area, access to I-85 and to other area roadways will remain the same. Communities along Shannon Bradley Road will continue to have the same access to I-85 via the NC 274 (Bessemer City Road) interchange or the Edgewood Road interchange. NCTA coordinated with the Matthews Acres subdivision west of Shannon Bradley Road regarding their access, as discussed in Final EIS Section 2.3.1.2. This subdivision is predominantly African-American and in a block group with approximately 10 percent of the population below the poverty level in 2000. The access to this community was modified in the refined preliminary design for the Preferred Alternative to directly connect to Shannon Bradley Road and the surrounding neighborhoods, as desired by the residents. The communities along Shannon Bradley Road would have nearby access to the proposed project at the US 29-74 interchange.</p> <p>Neighborhoods along Stagecoach Road would not experience any changes in access to I-85 or the surrounding road network. Major east-west roadways across the Preferred Alternative would remain. The closest access to I-85 would continue to</p>

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			<p>be via the NC 274 interchange. Residents in this area would have access to the proposed project at the Linwood Road and US 321 interchanges.</p> <p>For the Garrison Road area, access to I-485 has been via Garrison Road to NC 160 (Wallace Neel Road/Steele Creek Road) south to the NC 160 interchange with I-485. With the proposed project, access to I-485 from Garrison Road would still be via the existing NC 160/I-485 interchange. However, drivers would be rerouted south along Garrison Road to a new connection with Dixie River Road, which connects to NC 160 just north of the interchange. Although the route would change, it would be the same distance (approximately 3.0 miles) (Final EIS Figure 2-3).</p> <p>Regarding travel times, drivers using the Preferred Alternative would experience faster travel times when considering specific origins and destinations (Draft EIS Appendix C). However, if travelers use existing routes, as described in Draft EIS Appendix C, overall congested vehicle hours in the network would be less with the project in place (Appendix C, Section C.1.2), benefiting all travelers in Gaston County. Along I-85, traffic flow would improve somewhat with the project in place compared to the No-Build scenario due to decreases in traffic volumes that would occur due to traffic being diverted to the proposed project (Appendix C, Section C.1.3.1).</p> <p><u>Tolling Affect on Transit.</u> Transit is a part of GUAMPO’s and MUMPO’s long-range transportation plans, along with the proposed project. The project could provide opportunities for transit service enhancement by providing a potential new route, particularly for the popular express bus route from Gastonia to uptown Charlotte (Draft EIS Section 1.5.2.3). In the Shannon Bradley Road area, Gastonia Transit operates an existing route (Route 5) that uses US 29-74 and Shannon Bradley Road. This transit route, and access to the route, would remain the same or similar with the project in place. There is no existing transit route along Stagecoach Road. At the western end of the project, there are no existing transit routes operated by the Charlotte Area Transit System (CATS) in the vicinity of the Preferred Alternative, or any of the DSAs.</p> <p><u>Electronic Tolling.</u> The project is proposed to have only electronic tolling. This can sometimes be a barrier to low-income populations if an account or credit card is required for payment. Specific payment options have not yet been determined, but electronic toll collection options that do not require an account, a credit card, a checking account, or access to the Internet are planned to be available. In accordance with NC General Statutes (GS 139-89.123), “the Authority must operate a facility that is in the immediate vicinity of the Turnpike project and that accepts cash payment of the toll.” This includes pre-paid tolls and payment for tolls already</p>

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			<p>incurred and billed.</p> <p><u>Diversion of Traffic through Neighborhoods.</u> For the western end of the project, 2035 traffic forecasts indicate traffic volumes on North Myrtle School Road (major roadway just east of Shannon Bradley Road that traverses the eastern side of the Broomfield community would be the same with and without the Preferred Alternative (approximately 22,000 ADT). Stagecoach Road does not provide direct access to the proposed project interchanges, and would not be expected to experience substantial increases in traffic volumes due to the proposed project.</p> <p>For the Garrison Road community, no traffic would be diverted through the neighborhood. It is currently a dead-end street and would continue to be a dead-end street with the proposed project in place.</p> <p><u>Access and Impact to Businesses.</u> Free routes would continue to provide access to all businesses near the proposed project. At the eastern end of the project, there are no businesses estimated to be impacted by the Preferred Alternative in the Garrison Road area. At the western end of the project, businesses impacted by the Preferred Alternative near the Broomfield community are located along US 29-74. The relocation reports (Draft EIS Appendix F) indicate ten businesses in this area would be directly impacted. A review of the refined preliminary design shows that a service road is proposed to retain two of the businesses previously counted as relocated in the northwest quadrant of the proposed US 29-74 interchange (Final EIS Figure 2-3c). This reduces the number of relocated businesses to 8. Seven of these businesses are industrial and auto-related and do not provide unique services to the surrounding community. One business, the Bel Aire Motel no longer exists.</p> <p><u>Increased Air Quality/Noise Issues.</u> See item 'd' below.</p> <p><u>Summary Item 'c'.</u> Regarding minority populations, approximately 21 percent of the Demographic Study Area is minority (2000 Census). The minority population of Gaston County and Mecklenburg County together was approximately 32 percent of the total population in 2000. In 2010, the minority population in the Demographic Study Area was approximately 27 percent, and in Gaston County and Mecklenburg County together it was approximately 40.5 percent. In identifying environmental justice populations, NCDOT considers that an environmental justice population exists where the non-white population or low-income population is 10 percentage points higher than the county average or when either population exceeds 50 percent of the total. Approximately 28 percent of the Preferred Alternative relocations are estimated to be minority. Based on either the 2000 or 2010 Census, this is one to seven percent more than the Demographic Study Area but four to 12.5 percent less than the combined counties. Therefore, it can be concluded that</p>

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			<p>the Preferred Alternative would not disproportionately impact minority populations.</p> <p>Regarding low-income populations, Table 3-3 in the Draft EIS lists the estimated income levels of relocated households by Detailed Study Alternative. The table notes that low-income could be considered as being an income level of \$25,000 or less depending on household size. The US Department of Health and Human Services 2008 Poverty Guidelines list poverty thresholds as \$14,000 for a 2-person household and \$24,800 for a 5-person household. The average household size in Gaston County in 2000 was 2.53 persons, so for most households, low-income would be defined by the \$0-\$15,000 income level in Draft EIS Table 3-3. The Preferred Alternative has one relocation (or less than one percent) estimated at this income level.</p> <p>Based on US Census 2000 data, approximately 30 percent of households in Gaston County and 20 percent of households in Mecklenburg County had a household income of less than \$25,000. In the Demographic Study Area, approximately 26 percent of households had a household income of less than \$25,000.</p> <p>Direct relocations from the Preferred Alternative are estimated to include approximately 26 percent of households with incomes less than \$25,000 based on the Relocation Reports (Draft EIS Appendix F). This is four percent less than Gaston County, six percent more than Mecklenburg County and the same as the Demographic Study Area. Therefore, it can be concluded that direct relocation impacts of the Preferred Alternative would not disproportionately impact low-income households.</p> <p>Summary Item 'd'. Final EIS Section 3.3.2.7 discusses potential noise and air quality impacts to minority and low-income populations and provides estimates as to the number of noise-impacted receptors that are also minority or low-income. For this analysis, the percent of persons in poverty was used to evaluate impacts on low-income populations.</p> <p>As discussed in Final EIS Section 3.3.2.7, minority and low-income (persons in poverty) populations would not receive a disproportionately high and adverse level of noise impacts. As discussed in more detail in Section 3.3.2.7 of the Final EIS, the percentages of residential receptors predicted to be impacted by project-related traffic noise that are estimated to be minority (20 percent) or in poverty (10 percent) are approximately the same as the percentages of minority populations (21 percent in 2000 and 27 percent in 2010) and populations in poverty (10 percent in 2000 [note: poverty information by block group not available from the 2010 Census]) within the Demographic Study Area as a whole. Therefore, there would</p>

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			<p>be no disproportionately high and adverse noise effects to these populations. The same conclusion is reached regarding air quality impacts.</p> <p>It is also noted that based on coordination with residents of the Broomfield community at a small group meeting (July 14, 2009) (Table 3-1, Final EIS Section 3.1.3), residents expressed concern regarding graffiti and visual effects of the preliminary noise barrier proposed along the east side of the Preferred Alternative adjacent to Belfast Drive (Barrier 1-1). This noise barrier would directly face remaining residences located on the opposite side of Belfast Drive. If preliminary Barrier 1-1 is determined in final design to be feasible and reasonable, additional landscaping should be provided in this area to reduce potential visual impacts. This has been added as a special project commitment in the ROD (Item 13 - Visual Resources in Table A-1 in Appendix A).</p> <p>Summary Item 'e'. Additional analysis regarding environmental justice is not needed. As described above, and in the discussion included in Draft EIS Section 3.2.5 and Final EIS Section 3.3.2.7, there is no apparent disproportionately high and adverse impact to environmental justice populations.</p> <p>Using the 2000 Census block groups within the project study area, approximately 21 percent of the population is minority and 26 percent is low income. Based on the 2010 Census, it was determined that minorities comprise approximately 27 percent of the total population in the study area. Low-income census data for 2010 is only available down to the county level; therefore block group data is not available to determine the percentage of low-income households in the project study area.</p> <p>Draft EIS Section 3.2.5 discusses the presence of two predominantly minority communities in the project corridors, the Garrison Road community and the Broomfield community around Shannon Bradley Road, including the Matthews Acres subdivision. Impacts from the Preferred Alternative to these areas were minimized through refined designs to the maximum extent feasible. The refined preliminary design for the Preferred Alternative reduced relocations in the Garrison Road community by approximately five residences.</p> <p>Representatives from both these communities attended Citizens Informational Workshops. Small group meetings also were held with these communities to listen to their concerns and receive input on the project. As a result, for the Garrison Road community, there is a project commitment to conduct additional coordination with the Garrison Road Community Center non-profit and provide mitigation for the potential loss of their community center. As discussed in Final EIS Section 2.3.1.2, the access to the Matthews Acres subdivision was modified</p>

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			<p>based on input from the community. For the Broomfield community area, an environmental commitment was added to include additional landscaping to address potential visual impacts if Barrier 1-1 is determined feasible and reasonable during final design.</p> <p>In addition, as stated previously, project commitment has been added to the ROD that states NCTA will provide additional community outreach and take the necessary steps to effectively engage owners and tenants of the potentially low-income developments of Falls Estate, Levi Mobile Home Park (MHP), and Orion Oaks MHP during final design and right-of-way acquisition.</p>
37	Farmland	EPA continues to have environmental concerns regarding the impacts to farmlands including 146 acres of conversion from active agricultural lands and 1,084 acres of prime and important farmland soils (Table 1-5 of the FEIS). EPA is concerned about the loss of terrestrial forests (882 acres) and other greenspace (681 acres).	Table 2-9 in Section 2.5.2.3 of the Final EIS lists the impacts to prime and important farmland from the Preferred Alternative refined preliminary design. The Preferred Alternative would impact 588 acres of soils designated prime farmland soils and 274 acres designated as statewide important farmland soils. Impacts of the Preferred Alternative to active agricultural lands are listed in Table 2-12 in Final EIS Section 2.5.4.3, and are estimated to be approximately 152 acres. Also from Table 2-12, impacts to upland forests are estimated to be approximately 792 acres. Other greenspace is assumed to be disturbed/clearcut and successional lands. For these natural community types, the Preferred Alternative would impact approximately 668 acres, as listed in Table 2-12.
38	Indirect and Cumulative Effects	EPA continues to have environmental concerns regarding ICE. Table 1-8 of the FEIS includes the summary of potential for ICE by county. For DSA 9, the potential for accelerated growth and other indirect effects as a result of the project are characterized by NCTA and FHWA as "high". The proposed Gaston East-West Connector is expected to increase sprawl in the project study area and beyond, including parts of York County, S.C. (Page 1-49). EPA requests a copy of the ICE Quantitative Analysis report when it becomes available.	<p>The <i>Quantitative Indirect and Cumulative Effects Assessment</i> (August 2010) was distributed with the Final EIS on a CD contained on the inside cover of Volume 2. This report is summarized in Section 2.5.5 of the Final EIS. Also, the report is available on the project web site at www.ncdot.org/projects/gardenparkway.</p> <p>A Revised Final <i>Quantitative Indirect and Cumulative Effects Assessment</i> (July 2011) was prepared for the Preferred Alternative, as summarized in Section 3.5 of the ROD). The report is available on the project web site at www.ncdot.org/projects/gardenparkway.</p> <p>An additional quantitative assessment of indirect and cumulative impacts to water quality will be provided during permitting.</p>

APPENDIX C2

CITIZEN COMMENTS

Document Number	Agency/Organization	Date	Page Number
p001	Southern Environmental Law Center	02/22/11	C2-1
p002	William W. Toole	02/22/11	C2-29
p003	Dorothea Delano	02/04/11	C2-42
p004	Dorothea Delano	02/02/11	C2-47
p005	Dorothea Delano – email dated 2/12/11 and follow up letter dated 2/13/11	02/12/11 02/13/11	C2-50
p006	John Alexander	02/09/11	C2-55
p007	Tina Medlin	02/22/11	C2-57
p008	Carolyn Sly	02/21/11	C2-59
p009	S. Armstrong	02/22/11	C2-61
p010	Adejah Hoyle	02/22/11	C2-63
p011	Jackie Sly	02/21/11	C2-65
p025	Kym Hunter/Southern Environmental Law Center	04/20/11	C2-67
P026	J. David Farren and Kym Hunter/Southern Environmental Law Center	12/21/11	C2-71
<i>The following letters do not require responses</i>			
p012	Carolina Tractor/Ed Weisiger, Jr.	03/03/11	C2-114
p013	Jeff Scoggins	02/10/11	C2-115
p014	Amanda Rhyne	02/09/11	C2-116
p015	Keith Thompson	02/21/11	C2-117
p016	G.L. and J.L. Deese	02/04/11	C2-118
p017	Benny Devoes	02/06/11	C2-119
p018	David Dickson	02/09/11	C2-120
p019	Virginia Ellington	02/17/11	C2-121
p020	Jerry Campbell	03/23/11	C2-122
p021	Mark Skillestad	03/08/11	C2-123
p022	Harris Teeter/Thomas Dickson/Fred Morgenthall, II	04/01/11	C2-124
p023	Rick Houser	03/07/11	C2-125
p024	Gaston Association of REALTORS/Krista Sands	03/31/11	C2-126

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February 22, 2011

Ms. Jennifer Harris
NC Turnpike Authority
1578 Mail Service Center
Raleigh, NC 27699-1578
(jhharris1@ncdot.gov)

VIA US MAIL AND E-MAIL

Re: Final Environmental Impact Statement for Gaston East-West Connector Project

Dear Ms. Harris,

On behalf of the Clean Air Carolina and the Catawba Riverkeeper, the Southern Environmental Law Center ("SELC") offers the attached comments on the above-referenced Final Environmental Impact Statement ("FEIS") prepared by the Federal Highway Administration ("FHWA"), the North Carolina Department of Transportation ("NCDOT"), and the North Carolina Turnpike Authority ("NCTA"), collectively (the "Transportation Agencies").

SELC submitted extensive comments on the Draft EIS ("DEIS") in July 2009. Unfortunately, the FEIS fails to cure many of the flaws, omissions and mis-statements of the earlier document. The FEIS includes a new technical report on air quality, updated traffic forecasts, and a quantitative indirect and cumulative effects study. Unfortunately, these new studies do little to redress the flaws in the DEIS, nor do they create a reasonable justification for constructing the road. Accordingly, the comments below reiterate many of the concerns we expressed in our previous comments of July 21, 2009. SELC submitted a request to review public records pertaining to this project on January 31, 2011. To date, these records have not yet been provided. SELC thus reserves the right to supplement these comments once the public records have been provided and reviewed.

In light of the fundamental deficiencies in the FEIS, we request that the Transportation Agencies not issue a Record of Decision ("ROD") based on this document. Rather, given the lack of public support for this project and the current financial picture in North Carolina, we suggest that the Transportation Agencies first carefully evaluate and determine if this \$930 million project, with no legitimate transportation need or economic benefit, is an appropriate expenditure of the State's scarce resources. The FEIS states that "[g]enerally, of the public comments received, there were twice as many commenters who stated they opposed the project compared to those who supported the project."

Additionally, two petitions totaling over 7,275 signatures against the road were tendered. In light of this controversy, we suggest that the Transportation Agencies take a hard look at alternatives to address legitimate and pressing transportation priorities in the project area that would engender more public support.

If the Transportation Agencies determine that it is advisable to move forward with this project, we request that they initiate a new environmental review process and create a new DEIS that is based on an adequate Statement of Purpose and Need, that truly examines a reasonable range of alternatives, and that properly investigates the impacts of the project.

Purpose and Need

As we explained in our previous comments, the "Purpose and Needs" section of the DEIS failed to identify an underlying purpose that the project might fulfill, and instead restated the specific project design to build a new location toll road. The FEIS has done nothing to improve upon this state of affairs. If anything, the FEIS serves to further narrow the proffered purpose and need of the project. Although the FEIS states that "[t]he purpose of the proposed action has not changed since the Draft EIS was circulated," this does not appear to be a correct statement. While the DEIS included as one of the purposes of the project "to improve traffic flow on I-85, US 29-75 and US 321 in the Project area" the FEIS no longer includes this as a purpose. Instead, the FEIS now states that "[w]hile existing and future deficiencies of I-85 and US 29-74 are acknowledged in the Draft EIS, improving these specific roadways are not identified as purposes for this project."

This, albeit unacknowledged, change of project purpose and need in the middle of the NEPA process serves to reinforce our concern that the Transportation Agencies are using the EIS to do little more than "justify [] decisions already made" in direction violation of NEPA, 40 C.F.R. § 1502.2(g). The reason behind NCTA's sudden desire to quietly eliminate one of the project's stated purposes from consideration seems quite clear. As we pointed out in our comments on the DEIS, the Transportation Agencies' own numbers show that construction of the toll road, far from improving traffic flow on I-85, US 29-74 and US 321, will in fact lead to increased congestion on those roads. However, responding to this reality by changing the statement of purpose and need turns the function of that statement on its head. The statement is not intended to be created to best fit a pre-ordained conclusion, but rather to set out the clear underlying needs from which a variety of alternative solutions can be considered. This unacknowledged midstream reframing of the project purpose reinforces the conclusion that NCTA, with its linear focus on predetermined toll road projects, is not the appropriate agency to lead NEPA review relative to the other Transportation Agencies.

A clear statement of purpose and need is particularly important because it forms the basis from which alternatives can be considered. The Transportation Agencies use the statement to screen out any alternatives that do not fit the narrow criteria from any detailed consideration. In response to our concern that the statement is too narrow to support consideration of a reasonable range of alternatives, as required by NEPA, the FEIS simply states that "a variety of alternatives could meet the criteria." Other than this conclusory statement however, the FEIS gives no indication that any alternatives could, in fact, satisfy the narrow criteria. Each alternative to a new location highway is rejected out of hand, and in such a broad generalized manner that it is quite clear that there is no variant of any alternative that could ever come close to satisfying the overly restrictive purpose and need statement.

In fact, the criteria are so narrow that the Transportation Agencies have failed to demonstrate that even the pre-ordained toll facility will meet the criteria. One criterion states that to be considered in detail project alternatives must "reduce congested vehicle miles traveled and/or congested vehicle hours traveled in Gaston County compared to the No-Build Alternative in 2030." Given forecasts which show

7 that the construction of the toll road will increase congestion on many of the surrounding roadways, it is not clear that even the preferred alternative can successfully clear this hurdle. As we described in our comments on the DEIS the Transportation Agencies attempt to avoid this problem by making use of an extremely narrow way of calculating congested vehicle miles travelled which results in a very slight positive outcome for the preferred alternative. The response is not convincing, and is little more than further evidence of the exercise in post-hoc rationalization that is present throughout the NEPA documentation. In a similar vein, the FEIS continues to show that the project will result in little if any travel time savings for over half the project area, a fact which is inconsistent with the project's stated purpose to improve mobility, access and connectivity in the project area.

Metrolina Regional Travel Demand Model

9 While the FEIS has shifted focus away from relieving congestion on roadways in the project area, it continues to exaggerate the congestion problems that do exist in order to manufacture the need for a new location toll-highway. The FEIS does nothing to correct the inflated traffic volumes presented as existing conditions in the DEIS. As we explained in our previous letter, virtually all forecasts of existing traffic congestion were inflated, and in some cases were almost double the actual observed traffic volume for the same time period.

10 Rather than address these vast inaccuracies, which threaten to mislead the public regarding the reality of current traffic congestion levels and the viability of proposed solutions, the FEIS simply states that "accepted methods" of quantifying traffic congestion were used to generate the figures, and explains that the official Metrolina Regional Travel Demand Model ("MRM") was used as a basis for all traffic scenarios. The FEIS does admit that "[t]he model may have projected more robust growth rates for the period 2000-2010 than what had actually occurred up to 2006, resulting in lower actual traffic counts for that particular year compared to forecasted values" but does nothing to explain why the model nonetheless remains appropriate for use in the NEPA process. Instead, the Transportation Agencies decline to correct the flaws in the forecasts for existing levels of traffic or to recalibrate the model so that it may more accurately forecast a future "No-Build" scenario for the project area.

11 In response to concerns about the flawed traffic forecasts, the FEIS states that "updating the existing conditions information and 2030 no-build traffic operations . . . was not necessary for making decisions regarding the proposed project." Consequently, the only updates to traffic forecasts carried out in the FEIS are forecasts for the preferred alternative. A more up-to-date version of the MRM was used to calculate more realistic traffic projections for the "Build" scenario, but the Transportation Agencies declined to perform the same for existing conditions or the future "No Build" scenario. The illogical conclusion that legitimate data are not required in the decision-making process overlooks the fact that valid traffic forecasts are essential for determining the underlying need for the project and for determining which alternatives should be considered.

12 By deeming valid forecasts unnecessary, the FEIS is perhaps eluding to the fact that, because the decision to construct a toll road has been predetermined prior to the NEPA process, there is no purpose to truly considering if such construction is necessary and if there are alternatives that could meet transportation needs. Moreover, while, on the one hand, the FEIS states that no updates to the "No-Build" Scenario traffic forecasts need be made, on the other hand it presents a conclusion as if such updates have in fact been performed. By stating that "the important conclusion that traffic growth is

12 expected to continue in the region and congestion would occur on area roadways in the future, especially I-85, did not change with updates to the MRM," the FEIS misleadingly suggests that a future updated congestion analysis was, in fact, performed for a "No-Build" scenario.

13 While failing to update traffic forecasts for the "No Build" scenario, and existing conditions, the FEIS does include updated traffic forecasts for the preferred alternative, Gaston East-West Connector Updated Traffic Forecast and Revised Preliminary Design Traffic Capacity Analysis for the Preferred Alternative (HINTB, May 2010). However, the FEIS fails to include an important conclusion of this report in its larger analysis. While the body of the FEIS states that "based on the analysis of the Preferred Alternative refined preliminary design, all individual freeway, ramp merge, and ramp diverge locations are expected to operate at an acceptable peak hour LOS, which is defined as LOS D or better," this is not in fact the conclusion of the report. Instead, the report concludes that "the 4 lane freeway segment between NC 273 and Dixie River is expected to operate a LOS F in 2035." The report goes on to suggest that "if the forecasted traffic volumes develop, additional travel lanes on the Gaston East-West Connector will be needed from NC 273 eastward to I-485 to achieve acceptable LOS." If the Transportation Agencies anticipate that additional lanes will be needed in order for the project to fulfill its purpose and need, these additions should be factored into the analysis of project alternatives, the analysis of environmental impacts, and in discussions regarding project financing.

Build v. No Build

The FEIS uses the MRM both to justify the project's purpose and need, and as the "Build" scenario to analyze impacts from the project. It is worth noting, that in this respect, the Transportation Agencies take the complete opposite approach to that taken in the environmental analysis of the Monroe Connector/Bypass. Both the Gaston East-West Connector and the Monroe Connector/Bypass were included in the transportation network used to generate the MRM. However, while for the Gaston East-West Connector the MRM is used to create a "Build" scenario, for the Monroe Connector/Bypass it was used to generate a "No Build" scenario.

14 It is clear that the correct approach is the one employed in this FEIS, and not the approach currently being challenged in litigation regarding the Monroe project. If the MRM assumes construction of the Gaston East-West Connector then it is correct to use that model to create a "Build" scenario. However, such usage also makes it clear that traffic forecasts generated from this model represent a scenario in which the Gaston East-West Connector is constructed. Consequently, while traffic forecasts generated based on the MRM may well be consistent with NCDOT and FHWA guidance, that guidance does not govern the manner in which such models and analysis may be used in an EIS. A model may give out completely accurate information, but to remain relevant and accurate the data must be presented in the appropriate context for which it was made, and have its underlying assumptions made clear. The fact that data is accurate within a specific framework does not mean that the information can be reasonably used to help justify whatever point the Transportation Agencies chose to make regardless of context.

The use of the MRM as the project's "Build" scenario in the indirect and cumulative impacts analysis is consistent with the fact that the Gaston East-West Connector was assumed in the road network used to formulate the model. This fact however, calls into question the use of that same model to provide traffic projections for a "No-Build" scenario. By using a model that assumed the existence of

14 the project to generate traffic forecasts the FEIS overstates congestion on the surrounding highways and thus exaggerates the need for the project. Similarly, the FEIS bases part of its need for the project on population projections in the Gaston Urban Area Metropolitan Planning Organization's ("GUAMPO") Long Range Transportation Plan ("LRTP"). These population forecasts for 2010, 2020 and 2030 indicate substantial increases in population projections, which the FEIS suggests underscore the need for the project. However, these population projections are based on the same socio-economic data as the MRM and thus assume construction of the project. Once again the Transportation Agencies are comparing "building the project" with "building the project," undercutting the central purpose of the EIS.

Alternatives

15 In our comments on the DEIS we stated that the analysis of alternatives was deficient in several critical ways. The FEIS has done little to cure these fatal flaws. The alternatives analysis remains skewed by the improperly narrow statement of purpose and need set forth for this project. The FEIS fails to add any empirical data upon which to base its selection of the project over other alternatives, and, as outlined above, bases its justification of the preferred alternative on flawed data which overstates the need for a new location toll road and mischaracterizes how the road will impact congestion along the existing highways in the area. The FEIS continues to present an incomplete picture of costs associated with the project, and fails to provide an accurate examination into the impact on tolling on low-income and minority populations in the project area.

Reasonable Alternatives

16 In response to our comments discussing the failure in the DEIS to analyze a reasonable selection of alternatives to the proposed action, the FEIS states that a number of alternatives were "rigorously explored" and "objectively evaluated." However, as we have already discussed above, this rigorous exploration was little more than a swift determination that the alternatives would not satisfy the project's narrow purpose and need, a determination that was based on no detailed study or quantified data. The FEIS does little to add to this analysis.

17 The FEIS fails to give any further consideration to alternatives related to upgrading the existing highway system. Only two such alternatives were examined in the DEIS, involving widening I-85 to eight and ten lanes, and improvements to US 29-74. These alternatives were rejected as failing to improve "travel times, mobility, access, or connectivity." No consideration was given to other alternatives such as redesigning the I-85/ US-321 interchange, which many local residents believe should be a priority. In response to comments about upgrades to the existing road network, the FEIS mentions Braess's Paradox, the phenomenon by which additional road capacity serves to induce additional traffic to improved roads. This is a reality which the Transportation Agencies seem otherwise unconcerned with when it comes to adding new highway miles. Moreover, they assert the theory and consequent futility of upgrade activities based on the results of the flawed modeling outlined above, which vastly overstates the traffic forecasts for the existing roadways.

20 Furthermore, the FEIS continues to fail to look at how improvements to the existing highway system could interact with other alternatives such as increased freight rail capacity or new mass transit lines. While such alternatives standing alone may not be sufficient to address the underlying

20 transportation needs of the project area, they may work in conjunction with one another to provide a comprehensive solution. The Transportation Agencies have a duty under NEPA to consider such combinations of alternatives. See Davis v. Mineta, 302 F.3d 1104, 1122 (10th Cir. 2002). SELC concurs with EPA's suggestion that the Transportation Agencies should consider partnering with the Federal Transit Authority ("FTA") to evaluate a combination of these alternatives alongside highway improvements. 40 C.F.R. § 1502.14(c).

22 Despite this responsibility, the FEIS rejects out of hand SELC's suggestion that freight rail capacity upgrades should be considered in combination with other functional alternatives. While the FEIS does discuss the Piedmont and Northern Rail line that runs North of I-85, and which may soon be used for short-haul freight, it centers its discussion on the inability of that line to provide transit service and provides no analysis of its value as a freight rail service in removing freight trucks from the roadways. Furthermore, the FEIS suggests that, as such an alternative was not suggested by the public or resource agencies prior to the publication of the DEIS, there is no obligation to consider it. This statement seemingly ignores the Transportation Agencies' duties under NEPA to consider alternatives raised in the DEIS in their final analysis, and their underlying duty to consider a range of options. See Roosevelt Campobello Int'l Park Comm'n. v. U.S. EPA, 684 F.2d 1041, 1047 (1st Cir. 1982); Rankin v. Coleman, 394 F. Supp. 647, 657-58 (E.D.N.C. 1975).

23 The FEIS is similarly dismissive of SELC's concerns about the failure to fully consider transit in the DEIS. In response to SELC's comments, the FEIS states that "users of a mass transit alternative would be comprised of residents who typically live relatively close to the transit line." The FEIS thus rejects this alternative by stating that the preferred alternative would attract a "broader spectrum of users" including "regional and through travelers, including trucks delivering goods." This assertion is presented without any underlying data or analysis, and fails to consider how a broader spectrum of users may be obtainable through consideration of a combination of alternatives including freight rail options. Moreover, the conclusion apparently fails to recognize that transportation networks will shape how the region grows. While it *may* be true that only those who live relatively close to a transit line will choose to use it, such a reality should not *per se* count against a transit option without further discussion. For example, viewed this way transit may be helpful in creating pockets of centralized growth around transit centers rather than the sprawling growth that a new location highway is likely to induce.

24 In fact, transit could be a highly useful addition to the project area, bringing investment, rather than sending away jobs. The highly successful Blue Line of the Charlotte Lynx system, for example, quickly exceeded projected ridership upon completion and attracted over \$1.8 billion in transit-oriented development. By rejecting mass transit in this extremely generalized fashion rather than engaging in a location specific analysis based on quantifiable data, it becomes clear that it would be impossible for *any* mass transit solution to satisfy the extremely prescriptive "needs" elucidated for this project.

Disclosure of Costs

25 The FEIS continues to provide an incomplete presentation of costs for the project. The FEIS states that while North Carolina roads have traditionally been built with taxpayer funds, "there is not enough funding available from traditional resources in the foreseeable future to construct all priority projects" and that, consequently, the project will be constructed as a toll project. This phrasing gives the false impression that the road will be supported solely by toll revenue rather than "tax payer funds." In

fact, as noted in our comments on the DEIS, tax payers will be supporting the project in the amount of at least \$35 million a year for 40 years, a total of \$1.4 billion dollars, which, given interest rates, is more than the entire upfront cost of the project. Later, the FEIS states that “[t]he majority of [the] project will be funded through the sale of revenue bonds, but provides no support for this proposition. It is unlikely that revenue bonds will support the “majority” of the project. Revenue bonds for the Monroe Connector/Bypass, which is based on a similar financial plan, will support *less than half* of the project’s overall cost.

26

Despite the vast costs of the project, the FEIS continues to fail to fully quantify the costs of any non-toll alternatives. This is particularly troubling because the FEIS continues to use costs, without any detailed information or quantification, to screen out potential alternatives to the project. For example, the FEIS states that “the Multi-Modal alternative was determined to be cost prohibitive.”

27

Environmental Justice

As we pointed out in our previous comments, the Transportation Agencies have a duty to consider the effects of tolling on minority and low-income populations in the project area. The preferred alternative will have one of the highest percentages of minority relocations of all alternatives considered. Furthermore, low-income and minority populations will receive a higher percent of impact from construction of the project in terms of air quality, but will likely receive less of a benefit due to the costs of tolls to use the new roadway.

28

Responses to our comments on this matter in the FEIS make light of these concerns and assert that all motorists will benefit from construction because “a result of the project would be reduced traffic on the existing non-toll route I-85.” This statement is presented in apparent ignorance of admissions found elsewhere in the FEIS that levels of service on I-85 will remain at LOS F, and that the construction of the toll road will not in fact reduce traffic throughout I-85 and other local area roads, a reality that was made clear in Appendix C of the DEIS. In light of the fact that completing this project will not in fact “benefit all motorists,” coupled with the fact that many members of minority and low-income populations do not have access to an automobile, it is essential that the Transportation Agencies perform a proper analysis of the project’s impacts on these populations. While it is likely true that “no one project can solve all the transportation needs of all the people within and traveling through the Gaston urban area” this does not absolve the Transportation Agencies of their responsibilities under Executive Order 12898 or under NEPA to fully present what the impacts of a proposed project will be.

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Environmental Impacts

The FEIS documents the significant impacts that will occur with construction of the preferred alternative. Construction of the project will impact 38,894 linear feet of perennial streams, 7.5 acres of wetlands and will involve 91 stream crossings. EPA’s own calculations suggest that the project will impact 2,237 linear feet of stream per mile of new location highway, more than double the average of approximately 1,000 linear feet for a Piedmont project. The project will add approximately 500 acres of additional impervious surface cover to the study area and will directly impact 1,000 acres of tree cover and 290 acres of forested interior habitat. Additionally, “[u]p to 3,700 additional households and 300 fewer jobs are anticipated in the study area as a result of the indirect development shifts associated with the project.”

Water Quality and Wetlands Impacts

The new Indirect and Cumulative Effects analysis provides some additional details regarding the extent to which project will impact water quality and wetlands. However, the FEIS is still significantly lacking a detailed analysis of the impacts to 303(d) listed streams in the project area. In response to our concerns on this subject, the FEIS states that as “NCTA will be required to obtain a Section 401 Water Quality Certification and a Section 404 Individual Permit . . . [water] quality modeling, which will include modeling of storm water runoff, will be performed during the permit phase of the project.”

31

While it is true that NCTA will be required to obtain the permits mentioned, this fact does not relieve the agencies of their duties under NEPA to take a “hard look” at all the environmental impacts of the project, including water quality impacts. See e.g., Metropolitan Edison v. People Against Nuclear Energy, 460 U.S. 766, 771 (1983); Natural Resources Defense Council v. Morton, 458 F.2d 827, 838 (D.C. Cir., 1972). One of the purposes of NEPA is to provide such information to the public and decision-makers during the decision-making stage so that assessments of the project can be fully informed. National Audubon Society v. Dept. of the Navy, 422 F.3d 174, 184 (4th Cir. 2005). The agencies, perhaps because they had a predetermined preference prior to even the start of the NEPA process, suggest instead that such information should not be provided until the post-decision “permitting phase.” Such an approach does not comply with NEPA and the agencies should prepare a new DEIS that properly considers these impacts. This is particularly important, given the likelihood that the project will result in significant degradation of water quality to several of the project area’s 303(d) listed streams.

32

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Additionally, the FEIS does not provide sufficient information to demonstrate that the preferred alternatives is the “Least Environmentally Damaging Practicable Alternative” (“LEDPA”) for purposes of obtaining a § 404 Clean Water Act permit. Impacts to surface waters and wetlands are presented for all detailed study alternatives (“DSA”) in the FEIS Section 2. However, these impacts were calculated for the previous design of the project. The updated design reduces the median width significantly and includes the service roads that will be a necessary consequence of the project. While new calculations based on this updated design have been performed for the preferred alternative, no such calculations are presented for the other DSAs. Consequently, there is not way to determine if, based on current designs, the preferred alternative is the LEDPA. Moreover, the flawed analysis does not meet the basic requirement of NEPA to quantify and compare a proposed preferred project with other alternatives.

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Air Pollution

In our comments on the DEIS, we noted various deficiencies in the analysis of carbon monoxide, ozone, and mobile source air toxics (“MSAT”)s related to this project. The FEIS fails to address these deficiencies. The FEIS continues to fail to consider and disclose the risks of localized pollution associated with the substantial traffic growth caused by this project. Nor does the FEIS disclose how increased vehicle miles travelled (“VMT”) and sprawling growth patterns facilitated by this project would exacerbate the area’s smog problem. This is particularly relevant given that the Environmental Protection Agency (“EPA”) is poised to introduce a new ozone standard of 75ppm or lower some time this year. The FEIS fails to discuss in any detail how this project will contribute to the Metrolina area’s ability to be in compliance with this new standard.

36

37 While the FEIS does include a "Discussion of Impacts" for MSATs, the report looks at the issue in an extremely generalized manner, stating that the VMT occasioned by the project "means MSATs under the DSAs would probably be slightly higher than the No-Build Alternative in the study area." The analysis then follows with the vague statement that "localized increases in MSAT would likely be most pronounced along the new roadway sections that would be built where there are few major roadways and little industry." This brief analysis is not sufficient. Rather than providing generalized statements and few vague examples of potential localized impacts, the FEIS should present a thorough project-specific review of the potential for MSAT increases and detail more completely, and with more specificity, where localized impacts are likely to be felt. Furthermore, the statement in the FEIS that MSATs will be substantially reduced in the future as EPA implements new vehicle and fuel standards is highly misleading. EPA's implementation of standards is unrelated to the project, and the conclusion that construction of this project will lead to a relatively higher level of MSATs than if the project was not built remains true regardless of EPA's actions.

Indirect and Cumulative Impacts Analysis

As noted previously, the FEIS includes a Quantitative Indirect and Cumulative Impacts analysis. While this quantitative presentation of impacts is a step in the right direction, SELC is concerned about the integrity of the study. The current study shows a total job shift of 900 jobs to South Carolina, a shift of less than 1% of total jobs and a net loss of 300 jobs. However, an e-mail exchange between the authors of the survey suggests that the original numbers may have been much higher. After reviewing a draft of the study consultant Jill Gurak wrote an e-mail to the study authors stating that "I don't think there would be much support for a project in NC that appears to benefit SC the most and takes away growth from the I-85 corridor on the order of 10-15 percent."¹ She went on to ask if "more outside-of-model smoothing of the travel demand model results [should] be done?"

38 It is unclear exactly what Ms. Gurak was referring to when she mentioned *more* outside-of-model smoothing, however it appears that substantial changes to the document *did* occur between the draft that Ms. Gurak reviewed and the final version presented in the FEIS. While the final version does suggest a shift in growth towards South Carolina, the shift is not to the order of 10-15 percent, which presumably would total 9,000-13,500 jobs. To more fully understand this issue SELC sent its public records request to NCTA on January 31, 2011. SELC urges the Transportation Agencies to redo the DEIS and include an Indirect and Cumulative Effects analysis that uses genuine numbers and fully explains the basis for any adjustments to the data.

Sprawling Growth

39 The Indirect and Cumulative Impacts analysis states that the project area will see an increase in 3,700 new households, while seeing a net loss of 300 jobs when compared to a "No-Build" scenario. This growth pattern is emblematic of the sprawling patterns of growth new location highway facilities inevitably produce. The results will be highly problematic for local governments who will be provided with the costs of additional households without seeing a corresponding increase in local business. These important impacts should be fully disclosed and discussed in the NEPA documents.

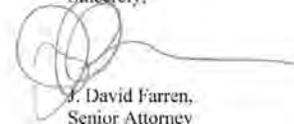
¹ E-mail from Jill Gurak to Lawrence Pesesky, Leo Tidd, Jeff Dayton & Christy Shumate, re: Gaston ICE (May 13, 2010)

Conclusion

The FEIS fails to provide the basis needed for a rational appraisal of this project's impacts, benefits, or alternatives. In light of the glaring flaws outlined above, the overwhelming public opposition to this project, and the monumental costs involved, we urge you to reconsider the project and if it is pursued to issue a new Draft EIS that addresses the issues raised by these comments, our earlier comments and the comments of others.

Thank you for your consideration,

Sincerely,



J. David Farren,
Senior Attorney



Kym Hunter,
Associate Attorney

Cc: (via e-mail and US Mail)

- Eugene A. Conti, NCDOT
- John Collett, NCDOT
- Deborah M. Barbour, NCDOT
- Robert A. Collier, NCDOT
- John F. Sullivan III, FHWA North Carolina Division
- David Joyner, NCTA
- Hank Graham, GUAMPO
- Robert Cook, MUMPO
- Senator Kathy Harrington
- Honorable Anthony Foxx, Mayor of Charlotte
- Honorable Jennie Stultz, Mayor of Gastonia
- Honorable Richard Boyce, Mayor of Belmont
- Honorable Ronnie Worley, Mayor of Cramerton
- Honorable Farrell Buchanan, Mayor of McAdenville
- Heinz J. Mueller, US EPA Region 4
- Christopher Militscher, US EPA
- Scott McLendon, US Army Corps of Engineers
- Polly Lespinasse, NC Division of Water Quality
- Marella Buncick, USFWS

p001

Rick Gaskins, Catawba Riverkeeper
David Merryman, Catawba Riverkeeper
June Blotnick, Clean Air Carolina

Appendix C2 – Citizen Comments

Table C2-1: Southern Environmental Law Center

Document: p001 letter dated Feb 22, 2011

COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
1	Comment Noted	The comments below reiterate many of the concerns we expressed in our previous comments of July 21, 2009. SELC submitted a request to review public records pertaining to this project on January 31, 2011. To date, these records have not yet been provided.	Records were made available to Southern Environmental Law Center (SELC) on March 30, 2011.
2	Alternatives Considered	Additionally, two petitions totaling over 7,275 signatures against the road were tendered. In light of this controversy, we suggest that the Transportation Agencies take a hard look at alternatives to address legitimate and pressing transportation priorities in the project area that would engender more public support.	<p>All comments received were considered both individually and collectively, and responses were provided to all comments in the Final EIS and ROD. In accordance with Council on Environmental Quality (CEQ) regulations (40 CFR 1502.14) and Federal Highway Administration (FHWA) guidance and regulations (FHWA Technical Advisory T6640.8A, 1987 and 23 CFR 771.123(c)), a range of reasonable alternatives, including non-toll alternatives, were rigorously explored and objectively evaluated, as summarized in Chapter 2 of the Draft Environmental Impact Statement (Draft EIS).</p> <p>The referenced petitions are discussed in Section 3.3.1 of the Final EIS. The Gaston Urban Area Metropolitan Planning Organization (GUAMPO) and the Mecklenburg-Union MPO (MUMPO) have also provided opportunities for public involvement throughout their long range transportation planning processes, as described in the GUAMPO 2035 Long Range Transportation Plan (LRTP) (page 2-4) and the MUMPO 2035 LRTP (page 3-1). For example, GUAMPO held a public meeting on February 7, 2011 about their long range transportation plans, and public comments received included comments about the Gaston East-West Connector. Appendix C4 of the ROD includes the public comments received on the proposed project at this GUAMPO meeting.</p> <p>Governmental agencies and Metropolitan Planning Organizations (MPOs) have had the opportunity to review public input provided on this project and their positions that this project is a top priority have not changed. The project remains a top priority in the Gaston Urban Area MPO (GUAMPO) 2035 Long Range Transportation Plan (LRTP) (see resolution dated March 22, 2011 in ROD Appendix C3).</p>
3	Purpose and Need for Action	Although the FEIS states that "[t]he purpose of the proposed action has not changed since the Draft EIS was circulated," this does not appear to be a correct statement. While the DEIS included as one of the purposes of the project "to improve traffic flow on I-85, US 29-75 and US 321 in the Project area" the FEIS no longer includes this as a purpose. Instead, the FEIS now states that "[w]hile existing and future deficiencies of I-85 and US 29-74 are acknowledged in the Draft EIS, improving these specific roadways are not identified as purposes for this project."	<p>The purpose of the project, as described in Draft EIS Section 1.3 is to "improve east-west transportation mobility in the area around the City of Gastonia, between Gastonia and the Charlotte metropolitan area, and particularly to establish direct access between the rapidly growing area of southeast Gaston County and western Mecklenburg County." Final EIS Section 1.1.3 states the project purpose has not changed since the Draft EIS was circulated, then the section restates the purpose, as included in this paragraph.</p> <p>This Draft EIS section goes on to list two needs in the area, including a need to improve traffic flow on major roadways in the area. The intent of this listing was to note the traffic problems on the area's major roadways. Section 1.3 then states the</p>

Appendix C2 – Citizen Comments

Table C2-1: Southern Environmental Law Center

Document: p001 letter dated Feb 22, 2011

COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
			<p>performance measures that would be used to evaluate alternatives:</p> <ul style="list-style-type: none"> • Reduce travel distances and/or travel times between representative origin/destination points within southern Gaston County and between southern Gaston County and Mecklenburg County. • Provide a transportation facility with a mainline that would operate at acceptable levels of service (generally LOS D or better on the mainline) in the design year (2030) for travel between Gaston County and Mecklenburg County. • Reduce congested vehicle miles traveled and/or congested vehicle hours traveled in Gaston County compared to the No-Build Alternative in 2030. <p>In summary, the purpose of the project has not changed from the Draft EIS.</p>
4	Purpose and Need for Action	This, albeit unacknowledged, change of project purpose and need in the middle of the NEPA process serves to reinforce our concern that the Transportation Agencies are using the EIS to do little more than "justify decisions already made" in direction violation of NEPA. 40C.F.R. §1502.2(g).	The purpose of the project has not changed from the Draft EIS.
5	Traffic and Travel Demand Modeling	As we pointed out in our comments on the DEIS, the Transportation Agencies' own numbers show that construction of the toll road, far from improving traffic flow on I-85, US 29-74 and US 321, will in fact lead to increased congestion on those roads. However, responding to this reality by changing the statement of purpose and need turns the function of that statement on its head. The statement is not intended to be created to best fit a pre-ordained conclusion, but rather to set out the clear underlying needs from which a variety of alternative solutions can be considered.	<p>The purpose of the project was not to explicitly improve congestion on I-85 or US 29-74. Existing and projected poor levels of service on these roadways are cited as transportation needs in the area. The project purpose is to "improve east-west transportation mobility in the area around the City of Gastonia, between Gastonia and the Charlotte metropolitan area, and particularly to establish direct access between the rapidly growing area of southeast Gaston County and western Mecklenburg County."</p> <p>As discussed in Section 1.3 of the Draft EIS and Section 1.2.2 of the Final EIS, project alternatives were evaluated in an iterative process to determine if they were reasonable and practicable. Each alternative concept was evaluated to determine whether it would:</p> <ul style="list-style-type: none"> • Reduce travel distances and/or travel times between representative origin/destination points within southern Gaston County and between southern Gaston County and Mecklenburg County. • Provide a transportation facility with a mainline that would operate at acceptable levels of service (generally LOS D or better on the mainline) in the design year for travel between Gaston County and Mecklenburg County. • Reduce congested vehicle miles traveled and/or congested vehicle hours traveled in Gaston County compared to the No-Build Alternative.

Appendix C2 – Citizen Comments

Table C2-1: Southern Environmental Law Center

Document: p001 letter dated Feb 22, 2011

COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
6	Alternatives Considered	A clear statement of purpose and need is particularly important because it forms the basis from which alternatives can be considered. The Transportation Agencies use the statement to screen out any alternatives that do not fit the narrow criteria from any detailed consideration. In response to our concern that the statement is too narrow to support consideration of a reasonable range of alternatives, as required by NEPA, the FEIS simply states that "a variety of alternatives could meet the criteria." Other than this conclusory statement however, the FEIS gives no indication that any alternatives could, in fact, satisfy the narrow criteria. Each alternative to a new location highway is rejected out of hand, and in such a broad generalized manner that it is quite clear that there is no variant of any alternative that could ever come close to satisfying the overly restrictive purpose and need statement.	The Draft EIS Chapter 2 and the <i>Addendum to the Final Alternatives Development and Evaluation Report for the Gaston East-West Connector</i> (October 2008) provide details regarding the evaluation of alternatives, and the reasons alternatives were eliminated or retained for detailed study. In addition, through the interagency coordination process, the environmental resource and regulatory agencies concurred on the Purpose and Need (Concurrence Point 1) and the Detailed Study Alternatives (Concurrence Point 2). Draft EIS Appendix A-1 includes these concurrence forms. No new information was presented after publication of the Draft EIS that warranted additional evaluation of alternatives other than the Preferred Alternative described in the Final EIS.
7	Traffic and Travel Demand Modeling	Given forecasts which show that the construction of the toll road will increase congestion on many of the surrounding roadways, it is not clear that even the preferred alternative can successfully clear this hurdle. As we described in our comments on the DEIS the Transportation Agencies' attempt to avoid this problem by making use of an extremely narrow way of calculating congested vehicle miles travelled which results in a very slight positive outcome for the preferred alternative.	Both congested vehicle miles traveled and congested vehicle hours traveled within Gaston County were appropriately calculated using the approved regional travel demand model. The Draft EIS Appendix C Section C.1.2 describes the statistics. As shown in the table, the New Location Alternative Toll Scenario not only accommodates more vehicle miles and vehicle hours traveled, it does so with less congested vehicle hours and less congested vehicle miles compared to the No-Build Alternative. Although some individual roadway segments in the transportation network of Gaston County may experience increased traffic volumes and/or congestion, others will experience less, and the model demonstrates there would be an overall net benefit to the network from the proposed project.
8	Traffic and Travel Demand Modeling	In a similar vein, the FEIS continues to show that the project will result in little if any travel time savings for over half the project area, a fact which is inconsistent with the project's stated purpose to improve mobility, access and connectivity in the project area.	Draft EIS Figure 7-2 shows average travel time savings for all trips considering all trips in all traffic analysis zones, representing relative effects in aggregate. Draft EIS Appendix C, Section C.2 discusses average travel times savings for representative specific origins and destinations. Section C.2 also discusses other mobility and connectivity issues. As discussed in these sections, the new location alternatives would improve travel times, mobility and connectivity.
9	Traffic and Travel Demand Modeling	The FEIS does nothing to correct the inflated traffic volumes presented as existing conditions in the DEIS. As we explained in our previous letter, virtually all forecasts of existing traffic congestion were inflated, and in some cases were almost double the actual observed traffic volume for the same time period.	A detailed response to this issue was provided in response to Comment 1 in SELC's comment letter included in Final EIS Appendix B-3, Table B3-12. This response is reproduced here. The traffic forecast methodologies and results used in developing the purpose and need and alternatives as summarized in the Draft EIS are documented in the <i>Traffic Forecasting for Toll Alternatives Report</i> (August 2008). The project forecasts were

Appendix C2 – Citizen Comments

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COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
			<p>prepared using a travel demand model, and in accordance with all FHWA and North Carolina Department of Transportation (NCDOT) standards (NCDOT Project Level Traffic Forecasting Administrative Procedures Handbook, 2007). Generally, travel demand models are used for simulating current travel conditions and forecasting future travel patterns and conditions. Travel demand modeling is a function of socioeconomic conditions such as residential densities, locations of jobs and services, and trip lengths and distributions for the various types of trip purposes.</p> <p>All scenarios discussed in the Draft EIS were forecasted from the same base model. The NCTA consultants who conducted the traffic forecasts did so utilizing the official Metrolina Regional Travel Demand Model (MRM), version 6.0, current at the time the traffic forecasts began. The MRM is used for all traffic forecasts for projects within the 13-county region surrounding Charlotte. The base year of this version of the MRM is 2000, with horizon years of 2010, 2020, and 2030. The MRM was calibrated based on observed traffic counts from 2000. It was adopted by the Mecklenburg-Union MPO (MUMPO), GUAMPO, Cabarrus-Rowan MPO (CRMPO), NCDOT, and FHWA after results showed that it met all FHWA calibration and validation standards.</p> <p>The MRM was used to forecast traffic for the project's base year of 2006 and the 2030 design year. The traffic operations analysis used these values. The traffic operations analysis levels of service for existing (2006) and 2030 no-build conditions reported in Section 1.6.2 of the Draft EIS are documented in the <i>Final Traffic Operations Technical Memorandum for I-85, I-485, US 29-74, and US 321 Under Various Scenarios – Gaston East-West Connector</i> (PBS&J, September 2008). These levels of service were calculated using methodologies and models consistent with NCDOT standards (NCDOT Congestion Management Capacity Analysis Guidelines).</p> <p>The MRM, the traffic forecasts developed based on the MRM, and the traffic operations analysis are consistent with NCDOT and FHWA standards and are the best available tools and methods for evaluating and comparing traffic conditions for the project area. Additional details are provided below.</p> <p>Traffic forecasts for the Preferred Alternative were updated to 2035 for the Final EIS. As discussed in Section 2.3.5.1 of the Final EIS, the updated 2035 traffic forecast for the Preferred Alternative is documented in the <i>Gaston East West Connector Updated Traffic Forecast and Preliminary Design Traffic Capacity Analysis for the Preferred Alternative</i> (HNTB, May 2010). The 2035 forecasts used a more recent version of the MRM (Version 6.1.1), which incorporated updated socio-economic data and a base year of 2005. The 2035 forecast volumes along the Gaston East-West Connector are projected to be higher than the previously</p>

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			<p>forecasted 2030 Toll scenario volumes. Generally, traffic volumes on the modeled network are higher in the 2035 forecast year compared to the 2030 forecast year. Updating the existing conditions information and 2030 no-build traffic operations analysis reported in Chapter 1 of the Draft EIS was not necessary for making decisions regarding the proposed project. Forecasts and levels of service for individual roadway segments for 2006 and 2030 might be different when estimated using the later version of the MRM. But overall, the important conclusion that traffic growth is expected to continue in the region and congestion would occur on area roadways in the future, especially I-85, did not change with updates to the MRM.</p> <p>Regarding the 2006 forecast traffic volumes presented in the Draft EIS, these volumes were interpolated from the 2000 base year MRM model and the 2030 no-build MRM model. A large amount of growth is projected to occur in Gaston County, particularly in the later horizon years of the Long Range Transportation Plan (LRTP). Since the travel demand model was calibrated to year 2000 traffic volumes, it can be expected that actual counts for any given subsequent year will vary at some locations. A comparison of the model's 2006 results (Existing Conditions scenario) with actual 2006 annualized average daily traffic counts along I-85 show that there is reasonably good correlation between the modeled and measured 2006 values for most of the study area. In areas where there are notable differences, measured volumes are lower by about 7 percent or less west of Exit 26 (Belmont Mount Holly Road), and lower by about 10-11 percent east of Exit 26. A review of multiple years of NCDOT traffic counts along I-85 show that between 2000 and 2006, traffic counts along segments can increase or decrease from year to year and can change at non-constant rates. For example, traffic counts along I-85 from Exit 27 to Exit 29 were 104,000 annual average daily traffic (AADT) in 2003, 103,000 AADT in 2004 (a change of -0.9 percent), and 120,000 AADT in 2005 (a change of 16.5 percent). The model may have projected more robust growth rates for the period 2000-2010 than what had actually occurred up to 2006, resulting in lower actual traffic counts for that particular year compared to forecasted values.</p> <p>Keeping in mind that the regional approved MRM was calibrated based on known traffic volumes in the year 2000, none of the differences in 2006 modeled volumes compared to 2006 counted volumes would invalidate the project studies or year 2030 forecasts. It could be expected that variations in economic and other conditions and swings in growth rates would normalize over the course of the 30-year forecast. The majority of the analyses reported in the Draft EIS, in particular those used to compare alternatives, were based on the 2030 forecasts (based on approved forecasts of socioeconomic data), not the 2006 forecasts, and are reasonable values to use in the planning process. Year 2006 traffic information was</p>

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			<p>included in the Draft EIS to document existing conditions and the changes predicted to occur by the horizon year. It is noted that in the case of the Gaston East-West Connector, the roadway that would experience the most influence from the presence of the toll facility is I-85, and the year 2006 forecasts and 2006 counts correlate well along I-85 throughout the study area.</p> <p>The measure of congestion used in the Draft EIS is level of service. The LOS is a “qualitative measure describing operational conditions within a traffic stream” (Transportation Research Board 2000:2-2). The analysis was performed in accordance with NCDOT Congestion Management Capacity Analysis Guidelines using the North Carolina Level of Service (NCLOS) software, Version 1.3. The NCLOS software provides an overall level of service, representative of general peak hour conditions. The LOS thresholds (density/speed) for each facility type are based on Highway Capacity Manual 2000 (Transportation Research Board Special Report 209) methodology, the accepted national standard. The software and method were appropriate for the type of analysis and information needed for making decisions regarding the proposed project. The analysis is documented in <i>Final Traffic Operations Technical Memorandum for I-85, I-485, US 29-74, and US 321 Under Various Scenarios – Gaston East-West Connector</i> (PBS&J, September 2008).</p> <p>The traffic operations analysis uses a number of assumptions and estimates, including the traffic forecasts and estimates of directional distribution, peak hour percentage of daily traffic, and percentages of trucks. An individual driver’s experience on any particular day at any particular peak hour will vary depending on the day and hour. These individual events and experiences may or may not appear to correlate with the predicted measures of general congestion along a route calculated using the accepted methods described above. Also, it should be noted that even if a roadway segment such as the segment of I-85 from Exit 26 to Exit 27 is already calculated to be operating at LOS F during the peak period, it is still possible for that roadway to carry more vehicles, the likely result being that congestion may worsen during the peak periods and/or the peak periods get longer</p>
10	Traffic and Travel Demand Modeling	Instead, the Transportation Agencies decline to correct the flaws in the forecasts for existing levels of traffic or to recalibrate the model so that it may more accurately forecast a future "No-Build" scenario for the project area.	See response to Comment 9 in this letter (letter p001).

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11	Traffic and Travel Demand Modeling	In response to concerns about the flawed traffic forecasts, the FEIS states that "updating the existing conditions information and 2030 no-build traffic operations ... was not necessary for making decisions regarding the proposed project." Consequently, the only updates to traffic forecasts carried out in the FEIS are forecasts for the preferred alternative. A more up-to-date version of the MRM was used to calculate more realistic traffic projections for the "Build" scenario, but the Transportation Agencies declined to perform the same for existing conditions or the future "No Build" scenario. The illogical conclusion that legitimate data are not required in the decision-making process overlooks the fact that valid traffic forecasts are essential for determining the underlying need for the project and for determining which alternatives should be considered.	As discussed in response to Comment 9 in this letter (letter p001), the traffic forecasts were prepared using the approved Metrolina Regional Demand Model. Updated 2035 traffic forecasts were prepared for the Preferred Alternative, which had included elimination of the Bud Wilson interchange. It is explained in Section 2.3.5.1 of the Final EIS that the 2035 forecast volumes along the Gaston East-West Connector are projected to be higher than previously forecasted 2030 Toll scenario volumes based on the use of a different version of the Metrolina Regional Model, updated socio-economic data, and the additional five years of traffic growth. Also, the existing roadway network in the project study area is projected to carry more traffic in 2035 than in 2030. It was not necessary to re-forecast the No-Build Scenario for 2035 if traffic is forecasted to increase overall from 2030 to 2035 and the 2030 No-Build conditions are already projected to be congested.
12	Traffic and Travel Demand Modeling	Moreover, while, on the one hand, the FEIS states that no updates to the "No" Build" Scenario traffic forecasts need be made, on the other hand it presents a conclusion as if such updates have in fact been performed. By stating that "the important conclusion that traffic growth is expected to continue in the region and congestion would occur on area roadways in the future, especially I-85, did not change with updates to the MRM," the FEIS misleadingly suggests that a future updated congestion analysis was, in fact, performed for a "No-Build" scenario.	Traffic congestion on I-85 is projected to occur under the 2030 No-Build Scenario, as discussed in Draft EIS Appendix C. It is logical to conclude that since traffic growth is expected to continue in the region beyond 2030, that congestion would continue to occur on I-85. Particularly since no other major roadway projects with the potential to divert substantial amounts of traffic from I-85 or increase its capacity are anticipated to occur between 2030 and 2035. As a result, no updates to the No-Build forecasts were necessary to aid in the decision-making process.
13	Traffic and Travel Demand Modeling	While the body of the FEIS states that "based on the analysis of the Preferred Alternative refined preliminary design, all individual freeway, ramp merge, and ramp diverge locations are expected to operate at an acceptable peak hour LOS, which is defined as LOS D or better", this is not in fact the conclusion of the report. Instead, the report concludes that "the 4-lane freeway segment between NC 273 and Dixie River is expected to operate at LOS F in 2035". The report goes on to suggest that "if the forecasted volumes develop, additional travel lanes on the Gaston East-West Connector will be needed from NC 273 eastward to I-485 to achieve acceptable LOS." If the Transportation Agencies anticipate that additional lanes will be needed in order for the project to fulfill its purpose and need, these additions should be factored into the analysis of project alternatives, the analysis of environmental impacts, and in discussions regarding project financing.	The traffic operations analysis for the Preferred Alternative (<i>Gaston East-West Connector Updated Traffic Forecast and Revised Preliminary Design Traffic Capacity Analysis for the Preferred Alternative</i> , May 10, 2010) states "The capacity analysis indicates that the section between NC 273 and Dixie River Road is expected to operate at LOS F in 2035.....With the addition of "auxiliary lanes" from NC 237 to I-485, the mainline basic freeway analysis of a 6 lane facility indicates that the Gaston East-West Connector is expected to operate at LOS C or better in 2035." The recommended auxiliary lanes were included in the refined preliminary design for the Preferred Alternative. The Final EIS Section 2.1.2 states, "The Preferred Alternative would have four 12-foot travel lanes, with a 50-foot median and 12-foot paved inside and outside shoulders.....In addition, between NC 273 (Southpoint Road) and I-485, there would be an auxiliary lane in each direction..." The proposed facility's refined preliminary design is projected to have an acceptable level of service (LOS D or better) through the design year, which fulfills one of the performance measures used to determine the ability of an alternative to meet the project's purpose (Draft EIS Section 1.3).

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14	Traffic and Travel Demand Modeling	<p>The FEIS uses the MRM both to justify the project’s purpose and need, and as the “Build” scenario to analyze impacts from the project.....the Transportation Agencies take the complete opposite approach to that taken in the environmental analysis of the Monroe Connector/Bypass. Both the Gaston East-West Connector and the Monroe Connector/Bypass were included in the transportation network used to generate the MRM. However, while for the Gaston East-West Connector the MRM is used to create a “Build” scenario, for the Monroe Connector/Bypass it was used to generate a “No Build” scenario.</p> <p>.....Consequently, while traffic forecasts generated based on the MRM may well be consistent with NCDOT and FHWA guidance, that guidance does not govern the manner in which such models and analysis may be used in an EIS. A model may give out completely accurate information, but to remain relevant and accurate the data must be presented in the appropriate context for which it was made, and have its underlying assumptions made clear. The fact that data is accurate within a specific framework does not mean that the information can be reasonably used to help justify whatever point the Transportation Agencies chose to make regardless of context.</p> <p>The use of the MRM as the project’s “Build” scenario in the indirect and cumulative impact analysis is consistent with the fact that the Gaston East-West Connector was assumed in the road network used to formulate the model. This fact however, calls into question the use of that same model to provide traffic projections for a "No-Build" scenario. By using a model that assumed the existence of the project to generate traffic forecasts the FEIS overstates congestion on the surrounding highways and thus exaggerates the need for the project. Similarly, the FEIS bases part of its need for the project on population projections in the Gaston Urban Area Metropolitan Planning Organization’s (“GUAMPO”) Long Range Transportation Plan (“LRTP”). These population forecasts for 2010, 2020, and 2030 indicate substantial increases in population projections, which the FEIS suggests underscore the need for the project. However, these population projections are based on the same socio-economic data as the MRM and thus assume construction of the project. Once again the Transportation Agencies are comparing "building the project" with "building the project," undercutting the central purpose of the EIS.</p>	<p>It is important to note that traffic forecasting and the forecasting of indirect and cumulative effects are two separate analyses and serve separate purposes, although both forecasts use, to some extent, the socio-economic forecasts from the Metrolina Regional Travel Demand Model (MRM). Socio-economic forecasts are one of many components of the MRM. The MRM is a tool developed by the region’s MPOs to perform their federally mandated duty of developing long-range transportation plans and transportation improvement programs for their metropolitan planning area. The National Environmental Policy Act (NEPA) and other federal regulations encourage the use of MPO planning tools and analyses during the environmental study process as they provide the best available data for informed decision making.</p> <p>Using the MRM for the traffic forecasts is a standard and reasonable practice. The MRM is designed to “model” traffic forecasts for different scenarios based on the traffic network the user inputs. Therefore, regional transportation models are appropriate under NEPA for the study of alternative transportation networks. The use of the MRM for the “no-build” traffic forecast was appropriate. NCTA “ran” the MRM without the project as an input for the “no-build” traffic forecast. No-build traffic forecasts can be found in <i>Final Traffic Operations Technical Memorandum for I-85, I-485, US 29-74, And US 321 Under Various Scenarios</i>, PBS&J, 2008</p> <p>Using the socioeconomic projections from the MRM for the Indirect and Cumulative Effects (ICE) Assessment is also a standard and reasonable practice. The MPO spent much time and resources in developing the socio-economic projections with the input of local experts, and the projections are a valuable resource for NEPA studies. As allowed by NEPA and Federal regulations, it is not necessary to redo socioeconomic data for the project ICE Study Area (also known as a Future Land Use Study Area [FLUSA]). During the ICE assessment, the agency conducted interviews with local planning experts to verify whether the project was included in the MRM socio-economic projections. It was determined that the project was considered in the socioeconomic projections and therefore, the socioeconomic projections represented the “build” ICE forecast. Once it was determined that the MRM socioeconomic projections represented the “build” ICE, then a separate socio-economic projection was performed to determine the “no-build” projection. These results are incorporated into the ICE Assessment.</p> <p>The results of the ICE Assessment show that any induced socio-economic conditions would have negligible effects on anticipated “no-build” traffic congestion. As an example, an increase of 3,300 households would not substantially change the conclusions about future congestion on I-85 and US 29-74</p>

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			<p>under the No-Build Scenario. The 3,300 households (an increase of approximately 2.9%) would generate approximately 33,000 ADT, which would disperse across the entire study area throughout the day to a variety of destinations, not just segments of I-85. For employment forecasts, the difference in employment estimates between the Build and No-Build scenarios is approximately 300 fewer jobs under the Build Scenario (a change of approximately 0.3%), and this difference would not change the traffic conditions in the study area. The estimated future no-build conditions on I-85 would continue to be congested. Current LOS is primarily LOS E/F through study area, so under the No-Build Scenario, it is safe to assume continuing congested conditions on I-85 regardless of any induced growth attributable to the project. Therefore, it was not necessary to revisit future traffic forecasts for the No-Build Scenario. The conclusions made in the study would not change.</p> <p>The Monroe Bypass/Connector is a different project completely contained within MUMPO, whereas this project is located predominantly within GUAMPO with a small portion inside MUMPO. The NCTA met with planners and local officials from both MPO's to determine how to appropriately use the socio-economic data for this project. When using a model for analysis, it is appropriate to work with those responsible for development and application of the model to understand how it should be used for analysis. The NCTA and its consultants conducted such inquiries, so that the models were used appropriately in each situation.</p>
15	Alternatives Considered	The FEIS fails to add any empirical data upon which to base its selection of the project over other alternatives, and, as outlined above, bases its justification of the preferred alternative on flawed data which overstates the need for a new location toll road and mischaracterizes how the road will impact congestion along the existing highways in the area.	<p>Traffic forecasts for the proposed project's EIS process were developed using the approved Metrolina Regional Travel Demand Model for the Charlotte region, which is the best available data and model for forecasting travel demand through 2035 and for informed decision making. Updates provided in the Final EIS include updated traffic forecasts for 2035 for the Preferred Alternative. Similar results would occur for the other Detailed Study Alternatives. Other updated studies for the Preferred Alternative include a traffic noise study addendum, updated hazardous materials study, a Phase II intensive archaeological survey, a conceptual mitigation plan, and a quantitative indirect and cumulative effects analysis. None of these updated studies indicated any project element would be infeasible. Similar results are expected to occur for the other Detailed Study Alternatives. Also, see response to Comment 9 in this letter (letter p001).</p>

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16	Alternatives Consideredthe FEIS states that a number of alternatives were “rigorously explored” and “objectively evaluated”. However, as we have already discussed above, this rigorous exploration was little more than a swift determination that the alternatives would not satisfy the project’s narrow purpose and need, a determination that was based on no detailed study or quantified data. The FEIS does little to add to this analysis.	<p>See responses to Comments 2 and 6 in this letter (letter p001). No new information was presented after publication of the Draft EIS that warranted additional evaluation of alternatives other than the Preferred Alternative described in the Final EIS. The alternative screening process utilized a multi-tiered approach, which is described in detail in Chapter 2 of the Draft EIS, and summarized in Section 1.2 of the Final EIS. The approach used earlier qualitative screenings, followed by later quantitative screenings.</p> <p>Opportunities for public and agency involvement and participation were provided throughout the development of the project’s purpose and identification and screening of alternatives, as described in Chapter 9 of the Draft EIS. The agencies ultimately agreed with and approved the alternatives evaluation through acceptance of Concurrence Point 2 (signed October 7, 2008). The concurrence form is included in Appendix A-1 of the Draft EIS.</p>
17	Alternatives Considered	The FEIS fails to give any further consideration to alternatives related to upgrading the existing highway system. Only two such alternatives were examined in the DEIS, involving widening I-85 to eight and ten lanes, and improvements to US 29-74. These alternatives were rejected as failing to improve "travel times, mobility, access, or connectivity."	<p>The Final EIS summarizes the alternatives evaluated for the project and rightly focuses on further consideration of the Preferred Alternative.</p> <p>Draft EIS Section 2.2.6 summarizes the various versions of the Improve Existing Roadways Alternatives that were evaluated. One alternative (Scenario 4) involves widening I-85 to 8-10 lanes, widening US 29-74 to 6 lanes, plus TSM measures. Another is Scenario 8, which is Scenario 4 plus widening north/south feeder roads. Both alternatives were considered as free alternatives and as alternatives that would toll I-85. Three tolling options were considered for I-85. As discussed in Section 2.2.6 and Appendix C of the Draft EIS, none of these options would satisfy the project’s purpose and need.</p> <p>Also, see response to Comment 16 in this letter (letter p001).</p>
18	Alternatives Considered	No consideration was given to other alternatives such as redesigning the I-85/ US-321 interchange, which many local residents believe should be a priority.	<p>As discussed in Draft EIS Section 2.2.6.4 (Impact Evaluation – Improve Existing Roadway Alternatives), “All interchanges along I-85 within the Project Study Area (a total of 11) would need to be reconstructed in order to meet current design standards (NCDOT and AASHTO) and to provide enough width under bridges to accommodate additional lanes.” The US 321 interchange is included as one of the interchanges.</p> <p>Improvements to the I-85/US 321 interchange is included in the GUAMPO 2035 LRTP as a separate project with a horizon year of 2015. This project alone would not reduce network congestion, as can be addressed by the Gaston East-West Connector project.</p>

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19	Traffic and Travel Demand Modeling	In response to comments about upgrades to the existing road network, the FEIS mentions Braess's Paradox, the phenomenon by which additional road capacity serves to induce additional traffic to improved roads. This is a reality which the Transportation Agencies seem otherwise unconcerned with when it comes to adding new highway miles. Moreover, they assert the theory and consequent futility of upgrade activities based on the results of the flawed modeling outlined above, which vastly overstates the traffic forecasts for the existing roadways.	<p>As explained in Draft EIS Appendix C, Braess's paradox is the phenomenon, recognized in complex networks (including telephone and Internet service), where increasing capacity on specific links, can in certain instances, increase congestion overall. This phenomenon appears to occur under the Improve Existing Roadways Alternatives, as discussed in Section C.1.2.</p> <p>Also as discussed in Appendix C, the New Location Alternatives generally improve network congestion overall, so Braess's paradox does not occur under those modeled conditions.</p>
20	Alternatives Considered	Furthermore, the FEIS continues to fail to look at how improvements to the existing highway system could interact with other alternatives such as increased freight rail capacity or new mass transit lines. While such alternatives standing alone may not be sufficient to address the underlying transportation needs of the project area, they may work in conjunction with one another to provide a comprehensive solution.	<p>The GUAMPO and MUMPO 2030 and 2035 Long Range Transportation Plans are multi-modal. They consider rail, transit, roadway, and bicycle/pedestrian travel modes in planning their comprehensive transportation systems. Within this framework, both the GUAMPO and the MUMPO have included the Gaston East-West Connector as part of their comprehensive transportation network, with GUAMPO ranking this project their top priority.</p> <p>The Draft EIS rigorously explored and objectively evaluated a range of reasonable alternatives as required by 23 CFR 771.123(c). As part of the multi-tiered alternatives analysis approach described in Chapter 2 of the Draft EIS, a number of project concepts were considered in the first screening of alternatives. These included a Mass Transit Alternative (bus or passenger rail) and Multimodal Alternatives. The roadway improvements for the Multi-Modal Alternatives could include those described for the TSM Alternative or those described for the Improve Existing Roadway Alternatives. The multimodal alternative was considered in two ways in the Draft EIS: a version that includes improvements to transit and roadways along existing facilities and a version that includes improvements to existing roadways and transit on new location. The primary reason for eliminating mass transit and multimodal alternatives was their inability to meet the project's purpose and need, as documented in the Draft EIS.</p> <p>The agency coordination team agreed to Concurrence Point 2 (Detailed Study Alternatives) at the October 7, 2008 TEAC meeting. The Concurrence Form is included in Draft EIS Appendix A-1.</p> <p>Regarding freight rail, see response to Comment 22 in this letter (letter p001).</p>
21	Alternatives Considered	SELC concurs with EPA's suggestion that the Transportation Agencies should consider partnering with the Federal Transit Authority ("FTA") to evaluate a combination of these alternatives alongside highway improvements. 40 C.F.R. § 1502. 14(c).	See response to Comment 20 in this letter (letter p001). FHWA and FTA work with the NCDOT and MPO's to plan, prioritize, and implement various transportation improvements in the region. This project does not preclude transit improvements in the area, but could enhance these opportunities in the future.

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22	Alternatives Considered	<p>Despite this responsibility, the FEIS rejects out of hand SELC's suggestion that freight rail capacity upgrades should be considered in combination with other functional alternatives. While the FEIS does discuss the Piedmont and Northern Rail line that runs north of I-85, and which may soon be used for short-haul freight, it centers its discussion on the inability of that line to provide transit service and provides no analysis of its value as a freight rail service in removing freight trucks from the roadways. Furthermore, the FEIS suggests that, as such an alternative was not suggested by the public or resource agencies prior to the publication of the DEIS, there is no obligation to consider it.</p>	<p>The Draft EIS rigorously explored and objectively evaluated a range of reasonable alternatives as required by 23 CFR 771.123(c). The alternative screening process utilized a multi-tiered approach, which is described in detail in Chapter 2 of the Draft EIS, and summarized in Section 1.2 of the Final EIS. The approach used earlier qualitative screenings of a wide range of concepts, followed by later quantitative screenings. Opportunities for public and agency involvement and participation were provided throughout the identification and screening of alternatives, as described in Chapter 9 of the Draft EIS. During the alternatives development process, freight rail as a project alternative was not suggested by the public or members of the agency coordination team. The agency coordination team ultimately agreed with and approved the alternatives evaluation through acceptance of Concurrence Point 2 (signed October 7, 2008). The concurrence form is included in Appendix A-1 of the Draft EIS.</p> <p>Additional alternatives can be considered at any time in the NEPA process if new information is brought forward by agencies or the public that warrants analysis. The lead agencies considered SELC's comment regarding a freight rail alternative, but determined that additional analysis not warranted.</p> <p>Freight rail capacity upgrades are often worthy projects implemented as part of an overall transportation network. Freight is addressed in the Gaston Urban Area MPO's 2035 LRTP as a component of their transportation plan, which also includes the proposed project. Freight rail typically moves goods over longer distances, with many goods transferred to trucks for ultimate local delivery, and not all freight can move by train. So freight rail service would only remove a portion of the freight trucks on the road now or in the future. Freight rail upgrades as a project alternative clearly would not meet the project's purpose of improving east-west transportation mobility in the area around the City of Gastonia, between Gastonia and the Charlotte metropolitan area and particularly to establish direct access between the rapidly growing area of southeast Gaston County and Western Mecklenburg County.</p>

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23	Alternatives Considered	The FEIS is similarly dismissive of SELC's concerns about the failure to fully consider transit in the DEIS. In response to SELC's comments, the FEIS states that "users of a mass transit alternative would be comprised of residents who typically live relatively close to the transit line." The FEIS thus rejects this alternative by stating that the preferred alternative would attract a "broader spectrum of users" including "regional and through travelers, including trucks delivering goods." This assertion is presented without any underlying data or analysis, and fails to consider how a broader spectrum of users may be obtainable through consideration of a combination of alternatives including freight rail options.	See response to Comments 20 and 21 in this letter (letter p001). The MPOs evaluated transit throughout the region and prioritized those improvements with available funding. The MPOs have been seeking funding to complete higher priority improvements. Should additional funding be available, it is not likely that the MPO would use the funding for transit in this area.
24	Alternatives Considered	By rejecting mass transit in this extremely generalized fashion rather than engaging in a location specific analysis based on quantifiable data, it becomes clear that it would be impossible for <i>any</i> mass transit solution to satisfy the extremely prescriptive "needs" elucidated for this project.	The Mass Transit Alternative and Multi-Modal Alternatives were considered but eliminated from detailed study, as summarized in the Draft EIS in Chapter 2. See also response to Comments 20 and 21 in this letter (letter p001).
25	Funding	The FEIS states that while North Carolina roads have traditionally been built with taxpayer funds, "there is not enough funding available from traditional resources in the foreseeable future to construct all priority projects" and that, consequently, the project will be constructed as a toll project. This phrasing gives the false impression that the road will be supported solely by toll revenue rather than "tax payer funds."	The variety of funding sources anticipated for the proposed project is stated in several responses to comments in Appendix B of the Final EIS (Examples: Appendix B4 – Table B4-11 Letter LC011 Comment 15, Appendix B4 – Table B4-12 letter lc012 Comment 4). Sources of funding for the project were explained in the FAQ (Frequently Asked Questions) sheet provided as a handout at the Public Hearings and Pre-Hearing Open Houses held in June 2009. This handout also is available on the project Web site (www.ncdot.org/projects/gardenparkway). As stated in the handout: "Funding to construct the project will be from multiple sources over the course of several years. The majority of this project will be funding through the sale of revenue bonds, which will be repaid with tolls collected along this roadway. The project may also be funded in part by federal credit assistance from the United States Department of Transportation under the Transportation Infrastructure Finance and Innovation Act – or TIFIA – program. STIP funds may be used. Appropriations from the NC Legislature (i.e. "Gap Funding" in the currently approved amount of \$35 million per year) are also anticipated."
26	Funding	Later, the FEIS states that "[t]he majority of [the] project will be funded through the sale of revenue bonds, but provides no support for this proposition. It is unlikely that revenue bonds will support the "majority" of the project.	A combination of toll revenue bonds and appropriation revenue bonds is expected to cover up to 80 percent of anticipated costs. Also, see response to Comment 25 in this letter (letter p001).

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27	Alternatives Considered	Despite the vast costs of the project, the FEIS continues to fail to fully quantify the costs of any non-toll alternatives. This is particularly troubling because the FEIS continues to use costs, without any detailed information or quantification, to screen out potential alternatives to the project. For example, the FEIS states that "the Multi-Modal alternative was determined to be cost prohibitive."	Section 2.2.5.2 of the Draft EIS discusses mass transit and multimodal alternatives. Multimodal alternatives are defined as alternatives that include the Mass Transit Alternative together with improvements to existing roadways. The primary reason for eliminating mass transit and multimodal alternatives was their inability to meet the project's purpose and need, as documented in the Draft EIS. The lack of financial feasibility was noted in Section 2.2.5.2 of the Draft EIS as an additional reason for finding that these alternatives were not reasonable alternatives.
28	Air Quality	Furthermore, low-income and minority populations will receive a higher percent of impact from construction of the project in terms of air quality, but will likely receive less of a benefit due to the costs of tolls to use the new roadway.	Final EIS Section 3.3.2.7 discusses air quality impacts to minority and low-income populations and provides estimates as to the number of noise-impacted receptors that are also minority or low-income. On a local basis, similar to traffic noise impacts, populations nearest the Preferred Alternative would have the highest potential to be affected by localized air quality impacts such as mobile source air toxics; and the same conclusions can be reached regarding general consideration of air quality effects. Which are, there would not be disproportionate air quality effects on minority populations or low-income populations because these populations do not comprise a disproportionate number of residents located in proximity to the Selected Alternative. Also, a result of the project would be reduced congestion on the overall transportation network (see Appendix C in the Draft EIS), which would benefit all motorists, including low-income motorists, who may choose not to use the toll facility or may tend to use it less frequently.

Appendix C2 – Citizen Comments

Table C2-1: Southern Environmental Law Center

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COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
29	Environmental Justice	<p>...."all motorists will benefit from construction because "a result of the project would be reduced traffic on the existing non-toll route I-85." This statement is presented in apparent ignorance of admissions found elsewhere in the FEIS that levels of service on I-85 will remain at LOS F, and that the construction of the toll road will not in fact reduce traffic throughout I-85 and other local area roads, a reality that was made clear in Appendix C of the DEIS.</p>	<p>Traffic forecasts and operations and regional travel demand statistics are described in detail in Appendix C of the Draft EIS and in Section 2.2.6.3 (Improve Existing Roadways Alternatives) and Section 2.2.7.2 (New Location Alternatives) of the Draft EIS. Appendix C includes forecasts and operations analyses for I-85, US 321, and US 29-74.</p> <p>The New Location Toll Alternative would reduce traffic volumes on I-85 primarily from NC 279 eastward compared to the No-Build Alternative, although levels of service would remain at LOS E or F in 2030. Similar to the Improve Existing Roadways Alternatives, there is not a large reduction in traffic volumes predicted to occur on I-85 because with the project in place, trips that are diverted to the Gaston East-West Connector from I-85 are replaced with different trips on I-85 that would like to use I-85 but had not in the past due to congestion. Overall, however, there is less congested vehicle hours and miles traveled with the New Location Toll Alternative in place, reducing the duration of congestion in the network.</p> <p>More importantly, however, the New Location Alternative provides an additional east-west route between Gaston and Mecklenburg Counties that would operate at level of service (LOS) D or better through 2035, which is a traffic flow benefit that cannot be achieved under either the Improve Existing Roadways Alternatives, the No-Build Alternative, or any other type of alternative evaluated (TSM Alternative, TDM Alternative, Mass Transit/Multimodal Alternatives). This additional new east-west route also improves the reliability of the east-west network. If an incident occurs on one of the local east-west routes or river crossings, the impact to travel would be less due to the additional option the new route provides.</p>
30	Environmental Justice	<p>While it is likely true that "no one project can solve all the transportation needs of all the people within and traveling through the Gaston urban area" this does not absolve the Transportation Agencies of their responsibilities under Executive Order 12898 or under NEPA to fully present what the impacts of a proposed project will be.</p>	<p>The draft and final EISs for the Gaston East-West Connector, and the Record of Decision, fully disclose the anticipated impacts of the proposed project, based on best available data at the time, in accordance with FHWA and CEQ regulations and guidance. FHWA has met its responsibility under Executive Order 12898.</p>
31	Water Resources	<p>The new Indirect and Cumulative Effects analysis provides some additional details regarding the extent to which project will impact water quality and wetlands. However, the FEIS is still significantly lacking a detailed analysis of the impacts to 303(d) listed streams in the project area.</p>	<p>Detailed information regarding the Preferred Alternative's direct impacts to individual streams is provided in Appendix I of the Final EIS. Section 2.5.5.7 of the Final EIS provides a discussion of the potential quantitative indirect and cumulative effects to water resources from the Preferred Alternative. This section also notes that additional modeling of pollutant loadings is anticipated to be required for the Section 401 Water Quality Certification.</p>

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COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
32	Water Resources	While it is true that NCTA will be required to obtain the permits mentioned, this fact does not relieve the agencies of their duties under NEPA to take a "hard look" at all the environmental impacts of the project, including water quality impacts. See e.g., <u>Metropolitan Edison v. People Against Nuclear Energy</u> , 460 U.S. 766, 771 (1983); <u>Natural Resources Defense Council v. Morton</u> , 458 F.2d 827, 838 (D.C. Cir., 1972).	The draft and final EISs for the Gaston East-West Connector, and the Record of Decision, fully disclose the anticipated impacts of the proposed project, based on best available data at the time, in accordance with FHWA and CEQ regulations and guidance.
33	Water Resources	The agencies, perhaps because they had a predetermined preference prior to even the start of the NEPA process, suggest instead that such information should not be provided until the post-decision "permitting phase." Such an approach does not comply with NEPA and the agencies should prepare a new DEIS that properly considers these impacts.	Water quality effects are discussed in the Draft and Final EIS at the appropriate level of detail needed for informed decision making. Differing levels of detail are allowed at different stages provided that the same level of detail is used for all alternatives at each stage (40 CFR 1502.14(b) and (d)). While qualitative data was used at the Draft EIS level, quantitative data regarding the anticipated direct and indirect impacts of the Preferred Alternative to water resources was considered and is included in the Final EIS. Impacts also are summarized in the Record of Decision. Final EIS Section 2.5.5.7 and Table 2-17 provide quantitative data regarding indirect and cumulative effects to water resources. Table 2-17 lists the estimated change in impervious cover by watershed for the No-Build and Build scenarios. Final EIS Section 2.5.5.7 also notes that additional modeling of pollutant loadings is anticipated to be required in association with the Section 401 Water Quality Certification. The additional water quality modeling analyses will be made available on the project Web site. The NCTA has participated in numerous meetings with the regulatory resource agencies, as described in Final EIS 3.2.1, and will continue to coordinate with regulatory agencies through the permit process.

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COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
34	Water Resources	Additionally, the FEIS does not provide sufficient information to demonstrate that the preferred alternative is the "Least Environmentally Damaging Practicable Alternative" ("LEDPA") for purposes of obtaining a § 404 Clean Water Act permit.	<p>As discussed in Final EIS Section 3.2.1, at the October 13, 2009 Turnpike Environmental Agency Coordination meeting, the environmental resource and regulatory agencies concurred, with the exception of the EPA, that Detailed Study Alternative 9 is the LEDPA. Final EIS Appendix G includes the concurrence form. Agencies that have the responsibility and expertise over the Clean Water Act had determined that the NEPA analysis contained sufficient information to determine the LEDPA as evident by the signing of the Concurrence Point 3 form. Originally EPA did not concur with the LEDPA. At a later date EPA concurred conditionally but opted to abstain from signing the concurrence form, noting in an email (included in Final EIS Appendix G) they had reservations concerning the ability to provide adequate mitigation for jurisdictional impacts.</p> <p>An abstention means the agency does not actively object to a concurrence point, but chooses not to sign the concurrence form. Further, the agency does not find that the project violates the laws and regulations under its purview, as the agency would have identified any issues through a non-concurrence and not an abstention. The merger process can continue and the agency agrees not to revisit the concurrence point subject to the guidance on revisiting concurrence points included in the Memorandum of Agreement that established the merger process.</p> <p>The Record of Decision includes an update to the Conceptual Mitigation Plan (Section 3.3) and the FHWA and NCTA are continuing to work with EPA and other environmental resource and regulatory agencies through the permitting process to develop mitigation.</p>
35	Alternatives Considered	While new calculations based on this updated design have been performed for the preferred alternative, no such calculations are presented for the other DSAs. Consequently, there is no way to determine if, based on current designs, the preferred alternative is the LEDPA. Moreover, the flawed analysis does not meet the basic requirement of NEPA to quantify and compare a proposed preferred project with other alternatives.	<p>The Preferred Alternative was developed to a slightly higher level of detail in the Final EIS. It is noted in Final EIS Section 2.2, that the relative comparisons made between Detailed Study Alternatives prior to design refinements made on the Preferred Alternative still apply. It is expected that design refinements for each DSA would be similar and relative values would remain similar.</p> <p>The Section 6002 Coordination Plan included the NEPA/Section 404 Merger process, where resource agencies concur at major milestones of the project. Most agencies concurred, with one abstention on the LEDPA (see response to Comment 34 in this letter [letter p001]). Thus, the transportation agencies and agencies with responsibility and expertise in natural, cultural, and human resources indicated that sufficient information was disclosed on significant impacts to determine the preferred alternative. The project analysis demonstrates the implementation of the project would not violate the requirements of the Clean Water Act.</p>

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COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
36	Air Quality	<p>In our comments on the DEIS, we noted various deficiencies in the analysis of carbon monoxide, ozone, and mobile source air toxics ("MSAT's) related to this project. The FEIS fails to address these deficiencies. The FEIS continues to fail to consider and disclose the risks of localized pollution associated with the substantial traffic growth caused by this project. Nor does the FEIS disclose how increased vehicle miles travelled ("VMT") and sprawling growth patterns facilitated by this project would exacerbate the area's smog problem. This is particularly relevant given that the Environmental Protection Agency ("EPA") is poised to introduce a new ozone standard of 75ppm or lower sometime this year. The FEIS fails to discuss in any detail how this project will contribute to the Metrolina area's ability to be in compliance with this new standard.</p>	<p>Regarding mobile source air toxics (MSATs), see response to Comment 37 in this letter (letter p001).</p> <p>Transportation conformity is discussed in the Draft EIS in Sections 4.2.2 and 4.2.5.1. At the time the Draft EIS was published, the proposed project was included in the approved Long Range Transportation Plans (LRTPs) for the Gaston Urban Area MPO and the Mecklenburg-Union MPO. A conformity determination for these LRTPs was made on June 8, 2005 and FHWA and FTA issued the conformity finding on June 30, 2005. The transportation conformity determinations were made for ozone and carbon monoxide. Since the project was part of a conforming plan, its effects on carbon monoxide and ozone would have been considered in the conformity determination.</p> <p>USDOT made a conformity determination on the 2035 LRTPs and TIPs on May 3, 2010. A copy of this letter, along with EPA's April 22, 2010 review, can be found in Appendix K of the Final EIS.</p> <p>As discussed in Final EIS Section 2.5.2.2, the current refined preliminary design for the Preferred Alternative was not completely consistent with the project's concept and scope included in the travel demand model used for the May 3, 2010 conformity determination. After the May 3, 2010 conformity determination made by the USDOT, the GUAMPO prepared an amendment to the 2035 LRTP and 2009-2015 TIP so that the project design concept and scope included in the LRTP and TIP is consistent with the Preferred Alternative. GUAMPO made a conformity determination on the amended 2035 LRTP and 2009-2015 TIP on August 24, 2010. USDOT issued a conformity determination on the amendments on October 5, 2010. A copy of the USDOT letter is included in Appendix K of the Final EIS.</p> <p>Also, as discussed in Section 4.2.5.1 of the Draft EIS, ozone emissions are not modeled at the localized level of streets and highways. Ozone takes several hours to form from hydrocarbons and nitrogen oxide, and urban areas as a whole are regarded as sources of ozone precursors. Therefore, compliance of an individual project with the ozone National Ambient Air Quality Standards (NAAQS) is demonstrated if the project is included in a conforming regional transportation plan, which the Gaston East-West Connector is.</p> <p>For carbon monoxide, localized "hot-spot" analyses are required for carbon monoxide non-attainment and maintenance areas under certain conditions listed in 40 CFR 93.123. As discussed in Section 4.2.5.1 of the Draft EIS, it was concluded that a localized carbon monoxide 'hot-spot' analysis was not required for the proposed project.</p>

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COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
37	Air Quality	<p>Rather than providing generalized statements and few vague examples of potential localized impacts, the FEIS should present a thorough project-specific review of the potential for MSAT increases and detail more completely, and with more specificity, where localized impacts are likely to be felt. Furthermore, the statement in the FEIS that MSATs will be substantially reduced in the future as EPA implements new vehicle and fuel standards is highly misleading. EPA's implementation of standards is unrelated to the project, and the conclusion that construction of this project will lead to a relatively higher level of MSATs than if the project was not built remains true regardless of EPA's actions.</p>	<p>A similar comment was received from the EPA, Comment 18 in letter a008. The response is reproduced below.</p> <p>As stated in Appendix D of the Final EIS, "Air toxics analysis is a continuing area of research. While much work has been done to assess the overall health risk of air toxics, many questions remain unanswered. In particular, the tools and techniques for assessing project-specific health outcomes as a result of lifetime MSAT exposure remain limited. These limitations impede the ability to evaluate how the potential health risks posed by MSAT exposure should be factored into project-level decision-making within the context of NEPA.</p> <p>Nonetheless, air toxics concerns continue to be raised on highway projects during the NEPA process. Even as the science emerges, FHWA is duly expected by the public and other agencies to address MSAT impacts in their environmental documents. The FHWA, USEPA, the Health Effects Institute, and other have funded and conducted research studies to try to more clearly define potential risks from MSAT emissions associated with highway projects. The FHWA will continue to monitor the developing research in this emerging field.</p> <p>While this research is ongoing, FHWA requires each NEPA document to qualitatively address MSATs and their relationship to the specific highway project through a tiered approach (Interim Guidance Update on Mobile Source Air Toxic Analysis in NEPA Documents, September 30, 2009).</p> <p>This approach is consistent and meets the requirements of 40 CFR 1502.22, which requires that "When an agency is evaluating reasonably foreseeable significant adverse effects on the human environment in an environmental impact statement and there is incomplete or unavailable information, the agency shall always make clear that such information is lacking."</p> <p>In FHWA's view, existing information is incomplete or unavailable to credibly predict the project-specific health impacts due to changes in MSAT emissions associated with a proposed set of highway alternatives. The outcome of such an assessment, adverse or not, would be influenced more by the uncertainty introduced into the process through assumption and speculation rather than any genuine insight in to the actual health impacts directly attributable to MSAT exposure associated with a proposed action.</p>
38	Indirect and Cumulative Effects	<p>It is unclear exactly what Ms. Gurak was referring to when she mentioned <i>more</i> outside-of model smoothing, however it appears that substantial changes to the document did occur between the draft that Ms. Gurak reviewed and the final version presented in the FEIS. While the final version does suggest a shift in growth towards South Carolina, the shift is</p>	<p>FHWA and NCTA reviewed and approved the study methodology and approach for the <i>Gaston East-West Connector Quantitative Indirect and Cumulative Effects Assessment</i> (Louis Berger Group, August 2010) and the <i>Revised Final Gaston East-West Connector Quantitative Indirect and Cumulative Effects Assessment</i> (Louis Berger Group, July 2011) and determined the proposed methodology and approach</p>

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COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
		<p>not to the order of 10-15 percent, which presumably would total 9,000-13,500 jobs. To more fully understand this issue SELC sent its public records request to NCTA on January 31, 2011. SELC urges the Transportation Agencies to redo the DEIS and include an Indirect and Cumulative Effects analysis that uses genuine numbers and fully explains the basis for any adjustments to the data.</p>	<p>were appropriate and the best available procedure to use. The FHWA and NCTA only used the final versions of the reports in the decision-making process.</p> <p>As the consultant for the project, Ms. Gurak is one of many staff who participates in reviewing information and data on topics included in the EIS, including initial and interim drafts of reports, and evaluates whether appropriate analyses have been undertaken. In this instance, Ms. Gurak was trying to understand the results of the gravity model reported in an initial draft of the <i>Quantitative Indirect and Cumulative Effects Assessment</i> (Louis Berger Group) (Quantitative ICE Assessment). The results in the initial draft of the Quantitative ICE Assessment that used the gravity model approach appeared to be counter-intuitive, and it was important that the results were verified and clearly explained. The term out-of-model smoothing can be used to describe the standard engineering practice of removing or reducing erroneous data to a localized area that resulted from the use of the gravity model without significantly altering the underlying results. "Smoothing" is used to increase the accuracy of results, rather than to invalidate otherwise correct results. The use of the gravity model was only one of many tools used for the Quantitative ICE Assessment. For instance, the Quantitative ICE Assessment stated that separate analyses of developable land were conducted outside the gravity model.</p> <p>Ms. Gurak's comments in the email regarding shifts in growth/employment of 10-15 percent were in reference to changes between the Build and No-Build Scenarios in specific individual traffic analysis zones (TAZs), particularly in the Bessemer City area and individual TAZs along the I-85 corridor, not in reference to overall results for the entire ICE Study Area.</p> <p>As a result of a public records request, SELC was provided the initial and all interim drafts of the Quantitative ICE Assessment, as well as the final report. Changes between the initial drafts and the final report were the result of changes in assumptions, and not due to "smoothing". A number of assumptions changed between the initial draft of the Quantitative ICE Assessment that used the gravity model approach and the final report. For instance, in the initial draft, it was assumed that the household and employment forecasts included in the Metrolina Regional Travel Demand Model (MRM) represented the No-Build ICE Scenario. However, after interviews with local planners, it was determined that the MRM 2035 household and employment forecasts better represented the Build ICE Scenario. Furthermore, the version of the MRM used in the initial draft included household and employment forecasts for the year 2030. The final report uses a version of the MRM that includes household and employment forecasts for the year 2035. (see Final EIS Section 2.5.5.4).</p>

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COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
			<p>In the initial draft of the Quantitative ICE Assessment, under the Build Scenario, the ICE Study Area in 2035 is estimated to have 4,877 more households and 2,256 more jobs than under the No-Build Scenario. In the final report summarized in the Final EIS, under the Build Scenario, the ICE Study Area is estimated to have 3,700 more households and 300 less jobs than under the No-Build Scenario. This does not mean that if the project is built, the ICE Study Area will have 300 less jobs than today. Rather, the growth of jobs that will occur in the ICE Study Area regardless of the project would be 300 less jobs with the project. Total employment growth in the ICE Study Area between 2005 and 2035 is anticipated to be 91,500 jobs in the No-Build Scenario and 91,200 jobs in the Build Scenario. The difference of 300 jobs between the two scenarios represents an approximately 0.3 percent difference, or approximately no change. In both the initial draft and final reports, the gravity model results show similar patterns and indicate a redistribution of employment in the ICE Study Area from the existing interstate corridors to the new project alignment area.</p> <p>In the ROD (Section 3.5), an update to the Quantitative ICE Assessment is summarized. The update includes an additional subwatershed (Fites Creek-Catawba River) in the ICE Study Area. The updated ICE Assessment is also available for download on the project Web site (www.ncdot.org/projects/gardenparkway). With the inclusion of the Fites Creek-Catawba River subwatershed, it is estimated that the ICE Study Area would have 3,300 more households and 300 less jobs than under the No-Build Scenario, which is consistent with the Quantitative ICE Assessment summarized in the Final EIS.</p>
39	Indirect and Cumulative Effects	The results will be highly problematic for local governments who will be provided with the costs of additional households without seeing a corresponding increase in local business. These important impacts should be fully disclosed and discussed in the NEPA documents.	<p>The results of the quantitative indirect and cumulative effects study are summarized in the Final EIS Section 2.5.5, and the technical memorandum is available for download on the project website. In addition, the updated quantitative indirect and cumulative effects study that adds the Fites Creek – Catawba River watershed to the ICE project study area, is summarized in the ROD. The updated <i>Revised Final Quantitative Indirect and Cumulative Effects Assessment</i> (July 2011) is also available for download on the project Web site.</p> <p>Final EIS Section 2.5.5.4 describes the gravity model methodology used in the ICE assessment. The gravity model formulation assumes that areas where accessibility increases as a result of a transportation project will be relatively more attractive for development than if the project had not been built. The gravity model provides an indication of the potential effects of just the proposed project. However, other factors can influence the likelihood of regional development shifts and include land availability and price, state of the regional economy, infrastructure, location</p>

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COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
			attractiveness and amenities, local political/regulatory conditions, and land use controls. Some of these other factors can be influenced by local government actions.

William W. Toole
714 Ann Street
Belmont, NC 28012

February 22, 2011

VIA Email (gaston@ncturnpike.org) and U.S. Mail

Ms. Jennifer Harris, PE
North Carolina Turnpike Authority
1578 Mail Service Center
Raleigh, NC 27699-1578

Re: Gaston East-West Connector
STIP # U-3321, Federal Aid Project # STP – 1213(6) (“Project”)
Citizen Comments to Final Environmental Impact Statement (December 2010)

Dear Ms. Harris:

I write to provide comments upon the Final Environmental Impact Statement dated December 2010 (“FEIS”) prepared by the United States Department of Transportation, Federal Highway Administration, and the North Carolina Turnpike Authority (“Turnpike Authority”) (collectively, “Transportation Agencies”) with regard to the Project.

1 The NEPA Project Manager for the Transportation Agencies plainly required in correspondence dated May 13, 2010 that data in the Quantitative Indirect and Cumulative Effects analysis be substantially altered in order to respond to political pressure. This alone renders the FEIS defective.

2 The FEIS fails to adequately evaluate reasonably available alternatives to the Project, including the widening of I-85, which the Transportation Advisory Committee (“TAC”) of the Gaston Urban Area Metropolitan Planning Organization (“GUAMPO”) stated in its open January 25, 2011 meeting is to be added to the Long Range Transportation Plan since the Project fails to meet the stated purposes of reducing congestion on I-85 and US 29/74.

3 For these and additional reasons set out below, as well as the reasons set out in correspondence from Ed Eason dated July 17, 2009, William W. Toole dated July 21, 2009 and the Southern Environmental Law Center dated July 21, 2009, each with regard to the Draft Environmental Impact Statement (“DEIS”), the Project fails to meet the project purpose. Furthermore, the FEIS must be re-written and resubmitted to the public for review and comment.

I. THE FEIS LACKS INTEGRITY.

A. Fundamental FEIS data has been tampered.

4 The integrity of the entire FEIS is tainted by the substantial data revisions that were undertaken by the Turnpike Authority solely to appease political concerns. The FEIS was made public in December 2010. The FEIS states “[u]p to 3,700 additional households and 300 fewer jobs are anticipated in the ICE Study Area as a result of the indirect development shifts associated with the project.” FEIS p. 2-69. This statement in the FEIS statement directly quotes page 30 of the Gaston East-West Connector Quantitative Indirect and Cumulative Effects Analysis prepared by the Louis Berger Group, Inc. dated August 3, 2010. (“Gaston ICE”).

Both the FEIS and the Gaston ICE included tables and identical figures that show the Project causing more than 1700 jobs to shift from the I-85 corridor to the Project corridor as compared to the No Build option. In particular, the FEIS and Gaston ICE reveal that the \$ 913 – 960 million Project will cause a net drain of 650 jobs to South Carolina that will otherwise remain in North Carolina by 2035 if the Project is not built. FEIS Table 2-15; FEIS Fig. 2-12; Gaston ICE Table 4; Gaston ICE Fig. 9. According to the FEIS and the Gaston ICE, building the Project will shift roughly 2 % of a total 91,000 jobs out of the I-85 corridor and to the Project corridor by 2035.

5 It appears, however, that essential data in the Gaston ICE was substantially altered at the specific request of the Transportation Agency’s NEPA Project Manager, Jill Gurak, four months before the Gaston ICE became final in August 2010.

The biggest concern we have is what seems to be quite large decreases in growth/employment in the urbanized areas of Gaston County that are being transferred to the project area and particularly to SC. *I don’t think there would be much support for a project in NC that appears to benefit SC the most and takes away growth from the I-85 corridor on the order of 10-15 percent. . . .* Should some more outside of model smoothing of the travel demand model results by done?

Email from Jill Gurak, PE, dated May 13, 2010 to Louis Berger authors Lawrence Pesesky and Leo Tidd, with copies to Turnpike Authority senior transportation planner Christy Shumate and Turnpike employee Jeff Dayton (italics added) (attached).

6 This email suggests the unmodified Gaston ICE predicted between 9,000 and 13,500 jobs would shift from the urbanized I-85 corridor to the Project corridor. The NEPA Project Manager correctly surmised that revealing such a large shift would have a poisonous effect on community support for the Project. Local economic development officials have consistently warned that the Project poses the real risk of siphoning retail activity from established retail corridors along I-85 and struggling municipal downtowns. Local leaders have been particularly wary of these risks and have expressed their concerns on

7 | numerous occasions. Being well aware of these local concerns, it appears Transportation Authorities deliberately concealed the full extent of these risks from the public.

8 | Decision makers expect from staff reliable, unbiased data upon which to base their decisions. The Turnpike Authority mistook its role as data-gatherer and instead acted as policy maker when it requested “more out of model smoothing” to produce employment and household results which it believed would politically acceptable. This is an unacceptable practice and renders the FEIS fundamentally flawed.

9 | The Gurak email directing the tampering of the Gaston ICE data irrevocably taints the integrity of the FEIS.

B. The FEIS relies upon traffic models that are demonstrably flawed.

10 | The DEIS describes traffic volumes for the base year 2006 as “existing,” yet comparison of these figures to traffic volumes observed in 2007 by the NCDOT Traffic Survey Group shows the 2006 figures to be inflated estimates. Compare DEIS, Tables 1-1, 1-2, 1-3, and 1-4, pp. 1-14 though 1-17 with NCDOT Traffic Survey Group, AADT Traffic Volume Maps (2007 Spreadsheet) found at http://www.ncdot.org/doh/PRECONSTRUCT/tpb/traffic_survey/. The DEIS consistently overestimates the “existing” traffic volume along each of the major roadways in the project area. This leads to inflated traffic congestion projections. The failure to accurately reconcile the 2006 estimates with the 2007 observed data corrodes the credibility of the long-term model projections.

11 | The DEIS predicts in Section C.2 of Appendix C that Belmont Peninsula residents will take 57 minutes to travel from the South Point Road/Armstrong Road intersection to the Charlotte Douglas Airport under the 2030 No Build Scenario. Currently, MapQuest shows the trip taking 17 minutes, with actual travel time being five minutes less. For the proposed travel savings to be correct, traffic must become so congested in twenty years that the trip increases by more than 40 minutes, an increase of over two to three hundred percent. This simply is not credible. Estimates of other time savings are equally incredible and biased in support of the Project.

12 | The Transportation Agencies defend the traffic model by stating some years have more traffic than others, but over time the model should work out. FEIS, B3-80. However, the model and the Transportation Agencies fail to reflect the demonstrated decreases in traffic and vehicle miles travelled (“VMT”) that have been caused by increases in the commodity price of petroleum and the prolonged increase in unemployment occasioned by the Great Recession. Because worldwide demand for petroleum will increase at a faster rate than production capacity, commodity prices for petroleum will continue to rise over the coming decades, driving down VMT. The traffic models used by the Transportation Agencies do not reflect the sustained economic change that has occurred since roughly 2007 and that is expected to alter traffic demand for decades.

13 | The Turnpike Authority announced at the January 25, 2011 TAC meeting that tolls would range between \$0.15 and \$0.25 per mile. The traffic model not only fails to reflect demand elasticity when the price of petroleum increases, but it also fails to reflect that the price of tolls on top of increasing petroleum prices will depress demand for the toll road option even further.

14 | Furthermore, the demand model reported in tables C-2 and C-3 of the DEIS reflects curious commuting patterns on US 321, I-85 and the Project. According to the reported model results, it appears that the Project will have no effect on north south traffic along US 321 and the historic neighborhoods situated on that highway, but will stimulate traffic between I-85, US 29/74 and the Project to the south. Given these reported traffic flows that defy reasonable explanation, it appears that either the model is seriously flawed or outside of model smoothing took place to address expected political considerations.

15 | The Transportation Agencies reflected a clear bias towards building the Project in the May 13 NEPA Project Manager email. Given the Agencies’ refusal to recalibrate the obviously flawed transportation models, the public is left wondering whether the demonstrable flaws in the traffic models and the Transportation Agencies’ refusal to recalibrate the models reflects a similar bias to skew results in favor of the Build option.

II. THE FEIS FAILS TO CONSIDER PRACTICABLE ALTERNATIVES.

A. The Project demonstrably fails to relieve congestion, yet the Transportation Agencies eliminated alternatives on grounds these alternatives fail to relieve congestion.

16 | One of the stated Project purposes is to improve traffic flow and safe travel on I-85, US 29/74 and US 321 in the Project Study Area. DEIS, p. 1-3. The Turnpike Authority has failed to appreciate this fundamental project purpose, and instead has stated publicly on numerous occasions that the purpose of the Project “is not to alleviate congestion on I-85.” See, e.g., “Study: Parkway won’t help I-85 traffic,” Belmont Banner News, p. 1 (July 1, 2009). This failure to appreciate a fundamental project purpose means the Transportation Agencies conducted a flawed analysis of reasonably available alternatives that resulted in a selective application of the project purpose during alternatives analysis.

17 | For example, the Transportation Agencies summarily reject the Transportation Demand Alternative because “travel times would not be noticeably reduced” and it would not “noticeably improve” congestion on I-85, US 29/74 and US 321. DEIS, p. 2-7. If the Transportation Agencies are correct that relieving congestion is not a project purpose (which they are not), then failure to relieve congestion cannot be a reason to eliminate an alternative.

18 | Even the Transportation Agencies concede “there is not a large reduction in traffic volumes” on I-85 as a result of building the Project. FEIS, B3-82. Table C-3 of the DEIS shows that traffic would operate at the same or worse level of service on US 29/74 if the Project is completed. DEIS, App. C, pp. C-7 through C-8. With one exception, table C-2 shows no improvement to the level of service on I-85 if the Project is

19 completed. DEIS, App. C, p. C-6. The DEIS does not demonstrate the substantial improvement to I-85 or US 29/74 that is required to meet the stated Project purpose, and it does not meet the level of congestion relief the Transportation Agencies selectively required of the rejected non-Project alternatives.

20 The DEIS cursorily reviews, then summarily concludes, that a number of alternatives, including High Occupancy Toll (HOT)/High Occupancy Vehicle (HOV) lanes on I-85, expanded mass transit, upgrading the existing road system, or some combination of these, fail to meet or exceed the defined purpose and need. Of course, the Transportation Agencies then fail to apply the same standard of success to the preferred alternative of Project construction.

21 The FEIS fails to adequately evaluate reasonably available alternatives to the Project, including the widening of I-85. The TAC stated in its open January 25, 2011 meeting at which the Turnpike Authority was represented that the TAC plans to add widening I-85 to its Long Range Transportation Plan since the Project fails to meet the stated purposes of reducing congestion on I-85 and US 29/74. Clearly, if the TAC believes widening I-85 is a viable alternative, then widening I-85 should be evaluated as a viable alternative to meet the stated project purpose of improving traffic flow and safe travel on I-85, US 29/74 and US 321 in the Project Study Area. The Transportation Agencies failed to give more than a cursory review before eliminating this alternative.

22 The Transportation Agencies concluded that Mass Transit Improvements on Existing Locations (consisting of bus or rail service) would not attract enough trips to noticeably reduce vehicle miles travelled or congestion, but they rely upon no study to support this conclusion. DEIS, p.2-9. In fact, demand for the Gastonia Express bus to uptown Charlotte was so great in July 2008 that there was standing room only on each of the four buses for the 7,400 riders, and VMT fell dramatically in the study area in 2008 when the price of petroleum climbed through \$4 a gallon. Rather than evaluating changed consumer behavior in response to new economic circumstances, the Transportation Agencies rely upon eleven year-old census data to conclude commuters in Gaston County will not use mass transit in the 21st century. FEIS B3-93.

23 The Transportation Agencies defend their rejection of the Improve Existing Roadways Alternative on the grounds that potentially necessary design exceptions would not be approved. FEIS B3-57. Yet, design exceptions have been approved in other circumstances. The Charlotte Region Fast Lanes Study (July 2009) concluded that a High Occupancy Toll (HOT) lane option was feasible, could be constructed in existing I-85 right of way, would save commuters 19 minutes, and unlike the Project would be fully self-supporting (construction and O&M) from toll revenues. The DEIS rejected the Improve Existing Roadways Alternative without detailed study and for summary conclusions that are redundant and at direct odds with other professional studies – travel times would not improve compared to the No-Build alternative, failure to provide east-west connectivity, and failure to improve level of service. DEIS, pp. 2-18 through 2-20.

24 The Transportation Agencies have not engaged in an objective evaluation of the reasonable alternatives using empirical data. Compared to their willingness to overlook the same deficiencies with the Project, the Transportation Agencies have not conducted a good faith review of the alternatives. This failure to conduct a good faith empirical review of reasonable alternatives is entirely consistent with the project bias displayed in the NEPA Project Manager’s email of May 13, 2010. For this reason, the FEIS is defective and the Transportation Agencies must conduct a proper alternatives analysis.

III. THE PROJECT FAILS TO MEET THE PROJECT PURPOSES OF PROVIDING A SUBSTANTIAL REDUCTION IN CONGESTION AND A SUBSTANTIAL IMPROVEMENT IN CONNECTIVITY.

25 The stated purpose of the Project is to (1) improve traffic flow and safe travel on I-85, US 29/74 and US 321 in the Project Study Area, and (2) improve east-west connectivity within Gaston County and between Gaston County and Mecklenburg County. DEIS, p. 1-3. To meet the purpose and need, an alternative “must provide more than a minor improvement. . . . Alternatives that provide only a minor improvement do not meet the purpose and need, and therefore are not reasonable alternatives.” *Id.*

26 **A. The Project actually increases congestion on I-85 and US 29/74, rather than providing the required substantial improvement, and therefore fails to meet the stated purpose.**

27 A primary purpose of the Project is to improve traffic flow and safe travel on I-85, US 29/74 and US 321 in the Project Study Area. DEIS, p. 1-3. *See also* DEIS, p. 2-4 (one of purposes is to “[r]educe congested vehicle miles travelled and/or congesting vehicle hours traveled in Gaston County compared to the No-Build Alternative in 2030”). The Project fails to meet the stated purpose of decreasing congestion.

A June 2, 2009 study prepared by the North Carolina Turnpike Authority compares various traffic scenarios at US 321, including that of terminating the Project there. The study shows the following daily traffic counts in the year 2030 and demonstrates that constructing the Project increases traffic on I-85 at US 321.

I-85 Daily Traffic West of US 321		I-85 Daily Traffic East of US 321	
No Toll Road	Connected to I-85	No Toll Road	Connected to I-85
119,200	124,400	134,600	137,600

28 Gaston East-West Connector (Garden Parkway) Preliminary Daily Traffic Volumes (June 2, 2009). All the scenarios show I-85 operating over capacity. This analysis of the Project clearly shows traffic on I-85 actually *increases* as a result of constructing the Project.

29 [Notwithstanding the data in Tables C-2 and C-3, and the June 2, 2009 analysis by the North Carolina Turnpike Authority, the DEIS states “[t]raffic operations would improve on I-85 and on segments of US 29-74 with the New Location Alternative (Toll or No-Toll Scenario) compared to the No-Build Alternative.” DEIS, p. 2-21. This statement is demonstrably wrong, yet it formed the basis for the decision to recommend a second screening of the Project at the expense of various other alternatives, including the No-Build alternative. DEIS, p. 2-22. Years later the Transportation Agencies concede “there is not a large reduction in traffic volumes” on I-85 as a result of building the Project. FEIS, B3-82.

30 [Since the conceptual stage of the Project, relieving congestion on I-85 has been a primary purpose of the East-West connector. The 2030 Long Range Transportation Plan by the Gaston Urban Area MPO, for example, states that the purpose of the toll road is to “serve as a bypass to Interstate 85, US 29/74 and US 321” and a “reliever to I-85 and US 29/74.” 2030 Long Range Transportation Plan, Gaston Urban Area Metropolitan Planning Organization, p. 71 (May 24, 2005). The DEIS declares that the purpose of the toll road is “to improve traffic flow on the sections of I-85, US 29-74 and US 321” in the study area, and to “reduce congested vehicle miles travelled” compared to traffic if the Project is not built. DEIS, p. 1-3. The Updated Final Purpose and Need Statement is equally clear that relieving traffic congestion on I-85, US 29/74 and US 321 is a fundamental purpose of the Project. *Final Updated Purpose and Need Statement*, p.5 (Oct. 15, 2008) (“Need to improve traffic flow on the sections of I-85, US 29-74 and US 321 in the project study area”). See also *Final Purpose and Need Statement*, p. 4 (Aug. 5, 2002) (“Need to improve traffic flow on the sections of I-85, US 29-74 and US 321 in the project study area”).

Despite the statement of purpose and need in the DEIS, numerous supporting documents, and widespread community expectations regarding the Project purpose, the Turnpike Authority has stated publicly on numerous occasions that the purpose of the Project “is not to alleviate congestion on I-85.” See, e.g., “Study: Parkway won’t help I-85 traffic,” Belmont Banner News, p. 1 (July 1, 2009). This determined refusal to embrace a basic Project purpose means the Transportation Agencies has conducted a selective evaluation to determine whether the Project meets the stated purpose, and that evaluation in fact reflects demonstrated bias in favor of constructing the Project.

32 [The toll road does not meet the basic purpose of relieving traffic congestion on I-85, US 29/74, or US 321. Consequently, the Project has no merit.

B. The Project does not substantially improve connectivity within Gaston County or between Gaston and Mecklenburg counties.

33 [A second stated purpose of the Project is to improve connectivity within Gaston County, and between Gaston County and Mecklenburg County. Much of the travel model data used to support the connectivity claims is suspect. In many cases, the estimated time savings described in the DEIS appears highly inflated when compared to actual ground-truthed travel times. The bulk of the travel scenarios show only marginal improvements

in travel time. The Transportation Agencies’ insistence on using unreliable data to support the Project is consistent with the demonstrated project bias, but is not consistent with the requirements of the National Environmental Policy Act.

34 [The \$ 930 million Project provides no meaningful, credible improvement in east-west connectivity, and certainly is not worth the impacts it will cause to the environment and the community. The sole effect of the Project is to induce development in a part of the county that is currently rural, not provide connectivity between existing destinations. Opening south Gaston County for development is not a recognized Project purpose.

IV. THE PROJECT FAILS TO HAVE LOCAL SUPPORT.

The Project fails to have local support because information in the public record demonstrates it fails to meet the stated purpose and need. As an illustration that the Project lacks local support, in 2010 voters twice rejected candidates favoring the Project for those opposing it by a 2:1 margin. A May 2010 poll of Gaston County voters conducted on behalf of the Civitas Foundation found 64% of voters were opposed to the Project. Over 7,000 citizens signed a petition opposing the Garden Parkway, even though less than 350 homes will be impacted by the Project.

* * *

Thank you for the opportunity to present these written comments. For the reasons stated above, the Project fails to meet the stated purpose and need and must be rejected. Furthermore, the FEIS lacks integrity and does not meet regulatory requirements. The FEIS must be rejected for additional evaluation, and that additional evaluation must be re-submitted for public review and comment.

Sincerely,

William W. Toole
Town Councilman, City of Belmont

CC: John F. Sullivan, III (Division Administrator, Federal Highway Administration)

From: Gurak, Jill S [mailto:JSGurak@pbsj.com]
Sent: Thursday, May 13, 2010 11:41 AM
To: Pesesky, Lawrence; Tidd, Leo
Cc: Dayton, Jeff; Shumate, Christy
Subject: Gaston ICE

Larry and Leo,

Thank you so much for getting this report together so quickly. We all felt that it was a huge improvement over previous versions and represents quite a bit of work. At this point we can actually discuss results and assumptions, where in previous version we weren't quite to that point.

Attached is your ICE Word document, with comments and minor editorial changes included. Below is a summary of the primary comments.

The biggest concern we have is what seems to be quite large decreases in growth/employment in the urbanized areas of Gaston County that are being transferred to the project area and particularly to SC. I don't think there would be much support for a project in NC that appears to benefit SC the most and takes away growth from the I-85 corridor on the order of 10-15 percent. I think the model may be skewing results somewhat since it is on the edge of the overall model. The way the maps are presented may also be somewhat misleading. Should some more outside-of-model smoothing of the travel demand model results be done?

NCTA also had concerns about how the assumption about overall growth not changing is addressed. They are concerned about the agencies buying into the theory that overall growth does not change with or without the project - it just redistributes. This is the same assumption used in the Monroe Connector project, but it was presented somewhat differently. A discussion included in the Monroe report occurs beginning on the bottom of page 17, extending onto page 18 of the attached Monroe report. Please take a look and see what your thoughts are regarding modifying this similar discussion in the Gaston report.

Please let us know if you are available tomorrow morning for a conference call to discuss.

Thanks again - Jill

Here are the comments contained in the attached document so you can see them all together:

Larry and I had talked about the qualitative study somewhat addressing steps 6 and 7 also. I'm not sure if he changed his mind on this.

Figure 1 – Boundary of qualitative ICE a bit hard to read on figure. Also, Quantitative spelled wrong in title block. Cleveland Co not labeled on Figure 1.

Section 2.1.5 - Why can't the employment and population be proportioned out based on area contained in each watershed? Are the results being skewed in these watersheds due to this combination? These watersheds seem to be attracting more development than one would intuitively expect.

Under "Conserved Land" in Section 2.3.4: Add the last sentence provided below:

- *Conserved land*- including properties in the North Carolina "Lands Managed for Conservation and Open Space" database, Conservation Tax Credit Properties and the proposed Berewick Regional Park. Major land areas in this category within the study area include Crowders Mountain State Park, Daniel Stowe Botanical Garden, and a Catawba Land Conservancy conservation easement along Catawba Creek.

Section 2.4.2 – Wildlife Habitat – 1st paragraph - You do not address "undisturbed habitat blocks" in the analysis later in Section 3.4. The map in one of the previous report versions that showed plots with 140+ acres could be useful for addressing this. Also, this section refers to tree cover estimates using Feature Analyst, but no graphic is provided.

Appendix C2 – Citizen Comments

**Table C2-2: William W. Toole
Document: p002 letter dated Feb 22, 2011**

COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
1	Indirect and Cumulative Effects	The NEPA Project Manager for the Transportation Agencies plainly required in correspondence dated May 13, 2010 that data in the Quantitative Indirect and Cumulative Effects analysis be substantially altered in order to respond to political pressure. This alone renders the FEIS defective.	See responses to Comments 38 and 39 in the Southern Environmental Law Center's letter (letter p001).
2	Alternatives Considered	The FEIS fails to adequately evaluate reasonably available alternatives to the Project, including the widening of I-85.	In accordance with CEQ regulations (40 CFR 1502.14) and FHWA guidance and regulations (FHWA Technical Advisory T6640.8A, 1987 and 23 CFR 771.123(c)), a range of reasonable alternatives, including non-toll alternatives, were rigorously explored and objectively evaluated, as summarized in Chapter 2 of the Draft EIS. No new information was presented after publication of the Draft EIS that warranted additional evaluation of alternatives other than the Preferred Alternative described in the Final EIS.
3	Purpose and Need	... the Project fails to meet the project purpose. Furthermore, the FEIS must be re-written and resubmitted to the public for review and comment.	As stated in Section 1.1.3 of the Final EIS, the project purpose is to improve east-west transportation mobility in the area around the City of Gastonia, between Gastonia and the Charlotte metropolitan area, and particularly to establish direct access between the rapidly growing area of southeast Gaston County and western Mecklenburg County. Performance measures used to evaluate alternatives are described in Section 1.2.2 of the Final EIS. As stated in Final EIS Section 1.2.2 and discussed in Draft EIS Section 2.2.7, the New Location Alternative would meet the project's purpose and need.
4	Indirect and Cumulative Effects	The integrity of the entire FEIS is tainted by the substantial data revisions that were undertaken by the Turnpike Authority solely to appease political concerns.	See responses to Comments 38 and 39 in the Southern Environmental Law Center's letter (letter p001).
5	Indirect and Cumulative Effects	It appears, however, that essential data in the Gaston ICE was substantially altered at the specific request of the Transportation Agency's NEPA Project Manager, Jill Gurak, four months before the Gaston ICE became final in August 2010.	See responses to Comments 38 and 39 in the Southern Environmental Law Center's letter (letter p001).
6	Indirect and Cumulative Effects	This email suggests the unmodified Gaston ICE predicted between 9,000 and 13,500 jobs would shift from the urbanized I-85 corridor to the Project corridor. The NEPA Project Manager correctly surmised that revealing such a large shift would have a poisonous effect on community support for the Project.	See responses to Comments 38 and 39 in the Southern Environmental Law Center's letter (letter p001).
7	Indirect and Cumulative Effects	Being well aware of these local concerns, it appears Transportation Authorities deliberately concealed the full extent of these risks from the public.	See responses to Comments 38 and 39 in the Southern Environmental Law Center's letter (letter p001).

Appendix C2 – Citizen Comments

**Table C2-2: William W. Toole
Document: p002 letter dated Feb 22, 2011**

COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
8	Indirect and Cumulative Effects	Decision makers expect from staff reliable, unbiased data upon which to base their decisions. The Turnpike Authority mistook its role as data-gatherer and instead acted as policy maker when it requested "more out of model smoothing" to produce employment and household results which it believed would politically acceptable. This is an unacceptable practice and renders the FEIS fundamentally flawed.	See responses to Comments 38 and 39 in the Southern Environmental Law Center's letter (letter p001).
9	Indirect and Cumulative Effects	The Gurak email directing the tampering of the Gaston ICE data irrevocably taints the integrity of the FEIS.	See responses to Comments 38 and 39 in the Southern Environmental Law Center's letter (letter p001).
10	Traffic and Travel Demand Modeling	The DEIS consistently overestimates the "existing" traffic volume along each of the major roadways in the project area. This leads to inflated traffic congestion projections. The failure to accurately reconcile the 2006 estimates with the 2007 observed data corrodes the credibility of the long-term model projections.	See response to Comment 9 in Southern Environmental Law Center's letter (letter p001).
11	Traffic and Travel Demand Modeling	The DEIS predicts in Section C.2 of Appendix C that Belmont Peninsula residents will take 57 minutes to travel from the South Point Road/ Armstrong Road intersection to the Charlotte Douglas Airport under the 2030 No Build Scenario. Currently, MapQuest shows the trip taking 17 minutes, with actual travel time being five minutes less. For the proposed travel savings to be correct, traffic must become so congested in twenty years that the trip increases by more than 40 minutes, an increase of over two to three hundred percent. This simply is not credible. Estimates of other time savings are equally incredible and biased in support of the Project.	<p>Origin and destination travel time estimates are reported in the Draft EIS in Section C.2 of Appendix C. These values are output from the approved Metrolina Regional Travel Demand Model that was used to forecast traffic for the proposed project. The origin/destination travel time savings estimates are comparisons between the No-Build Alternative for the year 2030 and the New Location Alternative (Toll Scenario) for the year 2030. These travel times would not necessarily correlate to travel times experienced today. As shown in Table C-4 in Appendix C of the Draft EIS, travel time savings under the New Location Alternative for trips within Gaston County are greatest (8-9 minutes) for trips starting and ending in southern Gaston County, reflecting the increased mobility the proposed project would provide within southern Gaston County. For trips between southern Gaston County and western Mecklenburg County, the travel time savings would be greater, ranging from 9-28 minutes depending on origin and destination (Table C-5 in Appendix C of the Draft EIS). These time savings are representative of these specific trips. Travel times of other trips within the project study area may vary.</p> <p>Travel time savings in 2030 realized by constructing the proposed project compared to the No-Build Alternative would be substantial for many specific origin/destination pairs, and the project also would have an effect on overall average travel times for trips throughout the project study area. In addition, the proposed project would provide an additional east-west route between Gaston County and Mecklenburg County that would operate at LOS D or better through 2035, which is a traffic flow benefit that cannot be achieved under either the Improve Existing Roadways Alternatives or the No-Build Alternative.</p>

**Table C2-2: William W. Toole
Document: p002 letter dated Feb 22, 2011**

COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
12	Traffic and Travel Demand Modeling	The Transportation Agencies defend the traffic model by stating some years have more traffic than others, but over time the model should work out. FEIS, B3-80. However, the model and the Transportation Agencies fail to reflect the demonstrated decreases in traffic and vehicle miles travelled ("VMT") that have been caused by increases in the commodity price of petroleum and the prolonged increase in unemployment occasioned by the Great Recession. Because worldwide demand for petroleum will increase at a faster rate than production capacity, commodity prices for petroleum will continue to rise over the coming decades, driving down VMT. The traffic models used by the Transportation Agencies do not reflect the sustained economic change that has occurred since roughly 2007 and that is expected to alter traffic demand for decades.	Traffic forecasts for the proposed project's EIS process were developed using the approved Metrolina Regional Travel Demand Model for the Charlotte region, which is the currently best available data and model for forecasting travel demand through 2035. Petroleum pricing and unemployment rates are not factors included in the model.
13	Traffic and Travel Demand Modeling	The Turnpike Authority announced at the January 25, 2011 TAC meeting that tolls would range between \$0.15 and \$0.25 per mile. The traffic model not only fails to reflect demand elasticity when the price of petroleum increases, but it also fails to reflect that the price of tolls on top of increasing petroleum prices will depress demand for the toll road option even further.	The toll rates presented at the meeting are representative of average toll rates on similar facilities in other states, as well as the NCTA's projects in Raleigh. A detailed assessment, including willingness to pay, value of time, and other economic factors, will be completed as part of an investment grade traffic and revenue study, and final toll rates at project opening will be based on this.
14	Traffic and Travel Demand Modeling	Furthermore, the demand model reported in tables C-2 and C-3 of the DEIS reflects curious commuting patterns on US 321, I-85 and the Project. According to the reported model results, it appears that the Project will have no effect on north south traffic along US 321 and the historic neighborhoods situated on that highway, but will stimulate traffic between I-85, US 29/74 and the Project to the south. Given these reported traffic flows that defy reasonable explanation, it appears that either the model is seriously flawed or outside of model smoothing took place to address expected political considerations.	Projected traffic volumes along US 321 are discussed in Draft EIS Section C.1.3.3, not in Table C-2 and Table C-3. As explained in Section C.1.3.3, a New Location Alternative would increase projected traffic volumes on US 321 south of the Gaston East-West Connector, but decrease volumes north of the Gaston East-West Connector, with levels of service remaining similar to the No-Build Alternative. This indicates that some traffic traveling to/from locations south of the project (including South Carolina) that is traveling US 321 to access an east-west roadway would choose to use the Gaston East-West Connector rather than travel a greater distance north to access I-85.
15	Traffic and Travel Demand Modeling	The Transportation Agencies reflected a clear bias towards building the Project in the May 13 NEPA Project Manager email. Given the Agencies' refusal to recalibrate the obviously flawed transportation models, the public is left wondering whether the demonstrable flaws in the traffic models and the Transportation Agencies' refusal to recalibrate the models reflects a similar bias to skew results in favor of the Build option.	See responses to Comments 5 and 9 in Southern Environmental Law Center's letter (letter p001).

Appendix C2 – Citizen Comments

**Table C2-2: William W. Toole
Document: p002 letter dated Feb 22, 2011**

COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
16	Purpose and Need	One of the stated Project purposes is to improve traffic flow and safe travel on I-85, US 29/74 and US 321 in the Project Study Area. DEIS, p. 1-3. The Turnpike Authority has failed to appreciate this fundamental project purpose, and instead has stated publicly on numerous occasions that the purpose of the Project "is not to alleviate congestion on I-85." See, e.g., "Study: Parkway won't help I-85 traffic," Belmont Banner News, p. 1 (July 1, 2009). This failure to appreciate a fundamental project purpose means the Transportation Agencies conducted a flawed analysis of reasonably available alternatives that resulted in a selective application of the project purpose during alternatives analysis.	As stated in Draft EIS Section 1.3 and Final EIS Section 1.1.3, the project purpose is to improve east-west transportation mobility in the area around the City of Gastonia, between Gastonia and the Charlotte metropolitan area, and particularly to establish direct access between the rapidly growing area of southeast Gaston County and western Mecklenburg County. As stated in Final EIS Section 1.2.2 and discussed in Draft EIS Section 2.2.7, the New Location Alternative would meet the project's purpose and need. Also, see response to Comment 3 in the Southern Environmental Law Center's letter (letter p001).
17	Alternatives Considered	For example, the Transportation Agencies summarily reject the Transportation Demand Alternative because "travel times would not be noticeably reduced" and it would not "noticeably improve" congestion on I-85, US 29/74 and US 321.	As discussed in Draft EIS Section 2.2.4, the Transportation Demand Management (TDM) Alternative was evaluated against the performance measures listed in Draft EIS Section 2.2.1. The reasons for deciding to eliminate this alternative are listed in Draft EIS Section 2.2.4.
18	Traffic and Travel Demand Modeling	Even the Transportation Agencies concede "there is not a large reduction in traffic volumes" on I-85 as a result of building the Project. FEIS, B3-82. Table C-3 of the DEIS shows that traffic would operate at the same or worse level of service on US 29/74 if the Project is completed.	See response to Comment 29 in Southern Environmental Law Center's letter (letter p001).
19	Alternatives Considered	The DEIS does not demonstrate the substantial improvement to I-85 or US 29/74 that is required to meet the stated Project purpose, and it does not meet the level of congestion relief the Transportation Agencies selectively required of the rejected non-Project alternatives.	See response to Comments 5 and 29 in Southern Environmental Law Center's letter (letter p001).
20	Alternatives Considered	The DEIS cursorily reviews, then summarily concludes, that a number of alternatives, including High Occupancy Toll (HOT)/High Occupancy Vehicle (HOV) lanes on I-85, expanded mass transit, upgrading the existing road system, or some combination of these, fail to meet or exceed the defined purpose and need. Of course, the Transportation Agencies then fail to apply the same standard of success to the preferred alternative of Project construction.	In accordance with Council on Environmental Quality (CEQ) regulations (40 CFR 1502.14) and FHWA guidance and regulations (FHWA Technical Advisory T6640.8A, 1987 and 23 CFR 771.123(c)), a range of reasonable alternatives, including non-toll alternatives, were rigorously explored and objectively evaluated. The Draft EIS Chapter 2 and the <i>Addendum to the Final Alternatives Development and Evaluation Report for the Gaston East-West Connector</i> (October 2008) provide details regarding the evaluation of alternatives, and the reasons alternatives were eliminated or retained for detailed study. No new information was presented after publication of the Draft EIS that warranted additional evaluation of alternatives other than the Preferred Alternative described in the Final EIS. The alternative screening process and results were discussed at several Turnpike Environmental Agency Coordination (TEAC) meetings, as listed in Section 9.2.3.3 of the Draft EIS. The agencies ultimately agreed with and approved the alternatives evaluation through acceptance of Concurrence Point 2, signed on October 7, 2008.

Appendix C2 – Citizen Comments

**Table C2-2: William W. Toole
Document: p002 letter dated Feb 22, 2011**

COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
21	Alternatives Considered	The FEIS fails to adequately evaluate reasonably available alternatives to the Project, including the widening of I-85. The TAC stated in its open January 25, 2011 meeting at which the Turnpike Authority was represented that the TAC plans to add widening I-85 to its Long Range Transportation Plan since the Project fails to meet the stated purposes of reducing congestion on I-85 and US 29/74.	See response to Comment 20 in this letter (letter p002). The current GUAMPO 2035 LRTP does not include widening I-85 as a project, and this project is not reasonably foreseeable. According to GUAMPO, there are no current plans to add widening of I-85 to the LRTP. The LRTP must be fiscally constrained and must include financial assumptions. That is, a funding source must be identified to finance all listed projects. Currently, the financial assumptions of the plan would not generate enough funding to finance the I-85 widening along with the proposed current road projects.
22	Alternatives Considered	In fact, demand for the Gastonia Express bus to uptown Charlotte was so great in July 2008 that there was standing room only on each of the four buses for the 7,400 riders, and VMT fell dramatically in the study area in 2008 when the price of petroleum climbed through \$4 a gallon. Rather than evaluating changed consumer behavior in response to new economic circumstances, the Transportation Agencies rely upon eleven year-old census data to conclude commuters in Gaston County will not use mass transit in the 21st century. FEIS B3-93.	From 2006 through 2010, the Gastonia Express monthly ridership varied from a low of 3,863 to a high of 7,408. The highest ridership occurred in 2008, with the peak ridership occurring in July 2008 at 7,408 riders, and the monthly average in 2008 being 6,220 riders. Average monthly ridership was 5,033 riders in 2009 and 4,867 riders January-November 2010 (85X ridership presentation at the GUAMPO TAC meeting on January 25, 2011). Traffic forecasts for the proposed project's EIS process were developed using the approved Metrolina Regional Travel Demand Model for the Charlotte region, which is the currently best available data and model for forecasting travel demand through 2035. Fuel prices are volatile, and predicting them and related changes in travel behavior are speculative.
23	Alternatives Considered	The Transportation Agencies defend their rejection of the Improve Existing Roadways Alternative on the grounds that potentially necessary design exceptions would not be approved. FEIS B3-57. Yet, design exceptions have been approved in other circumstances. The Charlotte Region Fast Lanes Study (July 2009) concluded that a High Occupancy Toll (HOT) lane option was feasible, could be constructed in existing I-85 right of way, would save commuters 19 minutes, and unlike the Project would be fully self-supporting (construction and O&M) from toll revenues.	The Fast Lanes Study is discussed in Section 2.2.6.2 of the Draft EIS (pages 2-14 and 2-15). The Draft EIS states that the Fast Lanes Study is evaluating the feasibility of providing one additional managed lane in each direction by restriping the existing pavement. However, the restriping would result in 11-foot wide lanes, which would be substandard for an interstate facility. The reduced shoulder and lane widths are major design changes that would need to be approved by NCDOT and FHWA. The design exceptions likely would not be approved since they would not be consistent with the American Association of State Highway and Transportation Officials (AASHTO) <i>Policy on Design Standards - Interstate System</i> (January 2005). If the new managed lanes were high-occupancy toll lanes, the two-foot shoulder that would result from the restriping would effectively eliminate the ability for enforcement of the occupancy requirement. If the new managed lanes were toll-only, the limited two-foot shoulder would be undesirable from a customer-service standpoint. Any vehicles that break down within the single toll lane would block the toll lane until such time that they could be safely removed. The Fast Lanes Study was finalized in July 2009. For the I-85 corridor west of Charlotte, the final study concludes that although revenue potential for a HOT lane would be favorable and travel times could be reduced, the physical attributes of the I-85 corridor in Gaston County would make it costly to add managed lanes to the existing cross-section and there is little opportunity for construction of a Fast Lanes facility without

Appendix C2 – Citizen Comments

**Table C2-2: William W. Toole
Document: p002 letter dated Feb 22, 2011**

COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
			using design exceptions. As discussed in Section 2.2.6.5 of the Draft EIS, implementing an HOV or HOT lane facility along existing I-85 by reconfiguring existing pavement was eliminated from detailed study. This alternative would not meet the project’s purpose since it would not improve mobility within southern Gaston County and between southeast Gaston County and western Mecklenburg County. Travel time savings for trips between southern Gaston County and Mecklenburg County would not substantially improve since vehicles would still need to drive on congested north-south routes from southern Gaston County to reach I-85.
24	Alternatives Considered	This failure to conduct a good faith empirical review of reasonable alternatives is entirely consistent with the project bias displayed in the NEPA Project Manager’s email of May 13, 2010. For this reason, the FEIS is defective and the Transportation Agencies must conduct a proper alternatives analysis.	In accordance with Council on Environmental Quality (CEQ) regulations (40 CFR 1502.14) and FHWA guidance and regulations (FHWA Technical Advisory T6640.8A, 1987 and 23 CFR 771.123(c)), a range of reasonable alternatives, including non-toll alternatives, were rigorously explored and objectively evaluated, as summarized in Chapter 2 of the Draft EIS. No new information was presented after publication of the Draft EIS that warranted additional evaluation of alternatives other than the Preferred Alternative described in the Final EIS.
25	Purpose and Need	The stated purpose of the Project is to (1) improve traffic flow and safe travel on I-85, US 29/74 and US 321 in the Project Study Area, and (2) improve east-west connectivity within Gaston County and between Gaston County and Mecklenburg County.	See response to Comment 3 in Southern Environmental Law Center’s letter (letter p001).
26	Purpose and Need	The Project actually increases congestion on I-85 and US 29/74, rather than providing the required substantial improvement, and therefore fails to meet the stated purpose.	See response to Comment 29 in Southern Environmental Law Center’s letter (letter p001).
27	Purpose and Need	A primary purpose of the Project is to improve traffic flow and safe travel on I-85, US 29/74 and US 321 in the Project Study Area.	See response to Comment 3 in Southern Environmental Law Center’s letter (letter p001).
28	Traffic and Travel Demand Modeling	Gaston East-West Connector (Garden Parkway) Preliminary Daily Traffic Volumes (June 2, 2009). (SEE TABLE IN LETTER) All the scenarios show I-85 operating over capacity. This analysis of the Project clearly shows traffic on I-85 actually <i>increases</i> as a result of constructing the Project.	See response to Comment 29 in Southern Environmental Law Center’s letter (letter p001).

Appendix C2 – Citizen Comments

**Table C2-2: William W. Toole
Document: p002 letter dated Feb 22, 2011**

COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
29	Alternatives Considered	Notwithstanding the data in Tables C-2 and C-3, and the June 2, 2009 analysis by the North Carolina Turnpike Authority, the DEIS states "[t]raffic operations would improve on I-85 and on segments of US 29-74 with the New Location Alternative (Toll or Non-Toll Scenario) compared to the No-Build Alternative." DEIS, p. 2-21. This statement is demonstrably wrong, yet it formed the basis for the decision to recommend a second screening of the Project at the expense of various other alternatives, including the No-Build alternative. DEIS, p. 2-22. Years later the Transportation Agencies concede "there is not a large reduction in traffic volumes" on I-85 as a result of building the Project. FEIS, B3-82.	See response to Comment 3 in Southern Environmental Law Center's letter (letter p001).
30	Purpose and Need	Since the conceptual stage of the Project, relieving congestion on I-85 has been a primary purpose of the East-West connector. The 2030 Long Range Transportation Plan by the Gaston Urban Area MPO, for example, states that the purpose of the toll road is to "serve as a bypass to Interstate 85, US 29/74 and US 321" and a "reliever to I-85 and US 29/74." 2030 Long Range Transportation Plan, Gaston Urban Area Metropolitan Planning Organization, p. 71 (May 24, 2005).	See response to Comment 3 in Southern Environmental Law Center's letter (letter p001). The GUAMPO LRTP has been updated to 2035, and can be found at www.gastonmpo.org/documents/lrtpfinal . The 2035 LRTP does not state the project purpose is to relieve congestion on I-85. The 2035 LRTP notes (page 6-32) that the Garden Parkway would "serve as a bypass to I-85, US 29/74, and US 321 and would provide an alternative connection to the Charlotte-Douglas International Airport (CDIA), which is the region's major air freight cargo facility, as well as the future home of the Norfolk Southern Intermodal Facility." The LRTP also notes (page 6-23) that "Interstate 85 would continue to accommodate the largest volumes of traffic in Gaston County, with the proposed Garden Parkway also carrying large volumes".
31	Purpose and Need	The DEIS declares that the purpose of the toll road is "to improve traffic flow on the sections of I-85, US 29-74 and US 321" in the study area, and to "reduce congested vehicle miles travelled" compared to traffic if the Project is not built. DEIS, p. 1-3. The Updated Final Purpose and Need Statement is equally clear that relieving traffic congestion on I-85, US 29/74 and US 321 is a fundamental purpose of the Project.	See response to Comment 3 in Southern Environmental Law Center's letter (letter p001).
32	Purpose and Need	The toll road does not meet the basic purpose of relieving traffic congestion on I-85, US 29/74, or US 321. Consequently, the Project has no merit.	See response to Comment 3 in Southern Environmental Law Center's letter (letter p001).
33	Purpose and Need	A second stated purpose of the Project is to improve connectivity within Gaston County, and between Gaston County and Mecklenburg County. Much of the travel model data used to support the connectivity claims is suspect. In many cases, the estimated time savings described in the DEIS appears highly inflated when compared to actual ground-truthed travel times.	See response to Comment 8 in Southern Environmental Law Center's letter (letter p001).

Appendix C2 – Citizen Comments

**Table C2-2: William W. Toole
Document: p002 letter dated Feb 22, 2011**

COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
34	Purpose and Need	The \$930 million Project provides no meaningful, credible improvement in east-west connectivity, and certainly is not worth the impacts it will cause to the environment and the community. The sole effect of the Project is to induce development in a part of the county that is currently rural, not provide connectivity between existing destinations. Opening south Gaston County for development is not a recognized Project purpose.	<p>The reasons for retaining the New Location Alternative for detailed study are described in Draft EIS Section 2.2.7.3 and include how the New Location Alternative would meet the project purpose and the evaluation measures listed in Draft EIS Section 2.2.1.</p> <p>The project purpose is to “improve east-west transportation mobility in the area around the City of Gastonia, between Gastonia and the Charlotte metropolitan area, and particularly to establish direct access between the rapidly growing area of southeast Gaston County and western Mecklenburg County.”</p> <p>Opening south Gaston County for development is not a project purpose. The indirect and cumulative effects of the project, including changes in land use, which may occur with implementation of the Preferred Alternative are described in the quantitative indirect and cumulative effects evaluation summarized in Final EIS Section 2.5.</p>
35	Public Involvement	Over 7,000 citizens signed a petition opposing the Garden Parkway, even though less than 350 homes will be impacted by the Project.	The referenced petition is discussed in Section 3.3.1 of the Final EIS.

Mr. John F Sullivan, III, PE,

In December the Final Environmental Impact Statement was sent to you for examination as the basis for the Record of Decision which will identify the Selected Alternative corridor of the Gaston East/West Connector. This Connector was declared a top priority in 2004 and designated a Strategic Highway Corridor.

The development of this road has proceeded despite the objections of 65% of the people. The public was involved for review and comment, but to my knowledge there was never a referendum put to the voters for approval or rejection. About 7000 signatures were signed against the construction of this road.

The following are comments on the Final Environmental Impact Statement that I sent to the NCTA with copies to the County Commissioners. I have included additional comments on accessibility. I also sent letters and/or e-mails to Senator Kathy Harrington with a copy to Mr. Gene Conti; Reps. John Torbett, Kelly Hastings, and Bill Current.

Noise (FEIS Section 2.5.2)

Noise barrier/receptors will be required at eleven subdivisions. The necessity of these barriers will negatively impact the aesthetic nature, land values and quality of life of the people living in the vicinity. The Belmont Peninsular will be hit with 31 barrier/receptors at the Brook Forest subdivision northwest of the NC 273 Gaston interchange and 22 northeast of the NC 273 Gaston interchange - not exactly what the city leaders had in mind 20 - 25 years ago.

Accessibility/Time Savings as related to Description (Sec. 2.1); Refinements (Sec. 2.3); Costs (Sec. 2.3.4)

No where in the description or refinements section is there any mention of completing the road to I-85 as a two lane road rather than ending it at 321. Yet the road is described as having a design speed of 70 mph for the mainline which conveniently omits this 5 mile two lane segment.

No where does the reduction in cost include this 5 mile section which was a major change in design in order to complete the road to I-85. Being a two lane road, this section will not contribute to reduced time savings.

Since the E/W Connector will end at I-485, it will not be beneficially accessible for motorists traveling from Gaston and Cleveland Counties because there will not be a high standard road leading directly into downtown Charlotte. The primary route will continue to be US 29/74.

The southern location of the E/W Connector at I-485 makes it less useful and less accessible for those who use the airport from Gaston and Cleveland Counties. I-85 and US 29/74 will still be the best route to the airport and save travel time.

The connectivity of Gaston County by means of another bridge across the Catawba River will increase accessibility for those who engage in negative opportunistic activities - from Mecklenburg to Gaston County and vice versa. The Belmont Peninsula will be vulnerable. From ancient times to the present this is a recorded fact in the history of mankind. For instance, the first interchange into Belmont from Mecklenburg County from I-85 and from US 29/74 has had robberies near that locale. The Peninsula doesn't need another bridge to cross the Catawba with the potential of opening up another avenue for this type of activity.

York County SC and South Carolina stand to benefit handsomely with the construction of the E/W Connector. York County will get a direct route to I-485 via US321 and SC 557 to NC 273, NC 274 and NC 279. York County will save travel times, reduce the number of vehicles on some roads such as US 49 and may even decrease maintenance costs on some of their roads, all at the expense of the State of North Carolina who will build and finance it.

Land Use (FEIS Section 2.5.5.6)

“York County, South Carolina’s 2025 plan calls for...concentrations of commercial and industrial land along US 321”. According to the FEIS document, “this is inconsistent with the plan of maintaining a primarily rural character in this area”. (FEIS P 2-72)

York County will benefit again by drawing employment into that area. We need to keep the money and jobs here in Gaston County!

The land use plan in this document calls for residential development with some mixed use throughout southeastern and south-central Gaston County. (Draft Summary & Updates EIS P 1-50)

The land use plan violates some of the tenets reported by the GUAMPO in their long range transportation plan for 2035 - to promote multi-modal transport and to mitigate sprawl. (2035 LRTP Sec. 2.0 and 5.0)

The concept for this road goes back 20 - 25 years. A whole generation has come up since then. At this point in time, the idea has lost its prime, which currently favors smaller homes in a more urban type setting with convenient access to amenities.

Summary

Noise barriers will negatively impact affected communities.

There is no mention of the two lane 5 mile section from US 321 [to I-85]. It will hinder travel time savings. Cost for this segment is included in the analysis but the section is not mentioned.

- 12] • The eastern end of I-485 has no direct high standard road into downtown Charlotte, making it less accessible to save travel time for motorists traveling in that direction.
- 13] • The terminus of the Connector, located south of CDIA, is less convenient for those going to the airport. Travel time will be best secured by way of I-85 or US 29/74.
- 14] • There is a potential for increased criminal activity because of the accessibility of another bridge, another route, connecting Gaston to Mecklenburg Counties.
- 15] • There is a clear benefit for South Carolina, specifically for York County citizens, economically and with travel time savings at the expense of the citizens of the State of North Carolina.
- 16] • Growth and land use projections and plans based on past identification needs may be untenable due to changes in the economic landscape and recent trends toward more urbanized growth with less sprawl.

Conclusion

There is no justification for this road - or any alternate. Its top priority imperative and Strategic Highway designation has impaired the overall infrastructure of Gaston County. For example, the dangerous US321/I-85 interchange is classified as a second priority. Truckers want a twin tractor trailer restriction lifted on US321 north for easier access to I-40, Hickory and Lincolnton. This would be terrible if the interchange isn't rebuilt first. The US29/74 Bridge that crosses the Catawba should be widened to accommodate the increased traffic from and to Mecklenburg County and also to accommodate the many bicyclists who use the bridge.

Mr. Sullivan, III, I ask you to please take into consideration my comments in opposition to this E/W Connector road. Yes, it is a connection, but each end of the connection, 2-lane I-85 west of Gastonia and I-485, has a problem. In addition, it is an increased burden and expenditure of money for the people of Gaston County and the citizens of the State of North Carolina.

Sincerely,

Dorothea Delano February 4, 2011
PO Box 1306
Belmont, NC 28012 ddelano7@bellsouth.net

Dorothea Delano

Appendix C2 – Citizen Comments

Table C2-3: Dorothea Delano

Document: p003 letter dated Feb 4, 2011

COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
1	Comment Noted	The public was involved for review and comment, but to my knowledge there was never a referendum put to the voters for approval or rejection. About 7000 signatures were signed against the construction of this road.	The referenced petitions are discussed in Section 3.3.1 of the Final EIS. Federal law and regulation requires the establishment of a Metropolitan Planning Organization (MPO) in urban areas to plan transportation improvements in its jurisdiction. The law and regulation require the MPO to be comprised of local elected officials and it is the MPO's role, by law, to plan, prioritize, and select transportation improvements. The MPO conducted public involvement after the Final EIS and comments were received. Your comments and others were considered in the MPO's decision making process.
2	Noise	Noise barrier/receptors will be required at eleven subdivisions. The necessity of these barriers will negatively impact the aesthetic nature, land values and quality of life of the people living in the vicinity. The Belmont Peninsula will be hit with 31 barrier/receptors at the Brook Forest subdivision northwest of the NC 273 Gaston interchange and 22 northeast of the NC 273 Gaston interchange - not exactly what the city leaders had in mind 20 - 25 years ago.	Two barriers on the Belmont peninsula were identified in the Final EIS Section 2.5.2.1 as being preliminarily reasonable and feasible. Noise barriers are proposed where they would provide a reduction in traffic noise to those residences behind the barrier. A Design Noise Study will be prepared for the Preferred Alternative during final design. The Design Noise Study will update the noise analysis and feasibility and reasonableness of noise barriers based on updated design and traffic forecast information and the latest noise abatement regulations and policies. There will be additional opportunities for input from property owners adjacent to the proposed noise barriers. Their opinions will be considered in the decision on whether to construct a recommended barrier.
3	Roadway Design	Nowhere in the description or refinements section is there any mention of completing the road to I-85 as a two lane road rather than ending it at 321. Yet the road is described as having a design speed of 70 mph for the <u>mainline</u> which conveniently omits this 5 mile two lane segment.	The EIS evaluates the ultimate project configuration, which is expected to be completed by 2035. Constructing the segment from I-85 to US 321 as two lanes would be an interim project phase.
4	Roadway Design	No where does the reduction in cost include this 5 mile section which was a major change in design in order to complete the road to I-85 Being a two lane road, this section will not contribute to reduced time savings.	The EIS provides an estimate of the total cost of the ultimate project. NEPA requires that the environmental analysis consider the ultimate impact of the project and does not require analysis of interim phases. The project's EIS evaluates the ultimate project configuration, which according to the 2035 LRTP, is expected to be completed by 2035.
5	Roadway Design	Since the E/W Connector will end at I-485, it will not be beneficially accessible for motorists traveling from Gaston and Cleveland Counties because there will not be a high standard road leading directly into downtown Charlotte. The primary route will continue to be US 29/74.	The Gaston East-West Connector will end at an interstate, I-485. Motorists traveling east to the end of the proposed project will have many destinations, including uptown Charlotte. From the project interchange at I-485, travelers can get to uptown Charlotte by continuing straight on West Boulevard or by going north on I-485 to I-85 then I-77 or going south on I-485 to I-77.
6	Roadway Design	The southern location of the E/W Connector at I-485 makes it less useful and less accessible for those who use the airport from Gaston and Cleveland Counties. I-85 and US 29/74 will still be the best route to the airport and save travel time.	See response to Comment 5 in this letter (letter p003) regarding the eastern terminus of the project at I-485. An extension of West Boulevard would tie to the Gaston East-West Connector at I-485 and provide access to the airport. Also, see response to Comment 8 in the Southern Environmental Laws Center's letter (letter p001) regarding travel times.

Appendix C2 – Citizen Comments

Table C2-3: Dorothea Delano

Document: p003 letter dated Feb 4, 2011

COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
7	Land Use and Transportation Planning	The connectivity of Gaston County by means of another bridge across the Catawba River will increase accessibility for those who engage in negative opportunistic activities - from Mecklenburg to Gaston County and vice versa. The Belmont Peninsula will be vulnerable.	There is no widely established procedure or methodology available to predict potential changes in crime rates resulting from the addition of a transportation facility to an area.
8	Indirect and Cumulative Effects	York County SC and South Carolina stand to benefit handsomely with the construction of the E/W Connector. York County will get a direct route to I-485 via US321 and SC 557 to NC 273, NC 274 and NC 279. York County will save travel times, reduce the number of vehicles on some roads such as US 49 and may even decrease maintenance costs on some of their roads, all at the expense of the State of North Carolina who will build and finance it.	A major roadway facility close to the state border will have effects in both states. The travel time savings for locations in South Carolina resulting from construction of the proposed project are shown in Draft EIS Figure 7-2. Indirect and cumulative effects in both South Carolina and North Carolina are discussed in Final EIS Section 2.5 and updated in ROD Section 3.5 . All travelers using the Gaston East-West Connector will pay a toll to use the facility, and will contribute to its financing.
9	Indirect and Cumulative Effects	“York County, South Carolina’s 2025 plan calls for... concentrations of commercial and industrial land along US 321”. According to the FEIS document, “this is inconsistent with the plan of maintaining a primarily rural character in this area”. (FEIS P 2-72) York County will benefit again by drawing employment into that area.	The quantitative indirect and cumulative effects study summarized in Final EIS Section 2.5 (and updated in the ROD Section 3.5) evaluates the potential effects or influence increased accessibility and mobility the project may have on area land uses. Actual land use changes also will depend on numerous other factors such as zoning decisions made by local governments, market conditions, economic conditions, availability of water/sewer, etc.
10	Noise	Noise barriers will negatively impact affected communities.	Noise barriers are proposed where they would provide a reduction in traffic noise to those residences behind the barrier. A Design Noise Study will be prepared for the Selected Alternative during final design. The Design Noise Study will update the noise analysis and feasibility and reasonableness of noise barriers based on updated design and traffic forecast information and the latest noise abatement regulations and policies. There will be additional opportunities for input from property owners adjacent to the proposed noise barriers. Their opinions will be considered in the decision on whether to construct a recommended barrier.
11	Roadway Design	There is no mention of the two lane 5 mile section from US 321 [to I-85]. It will hinder travel time savings. Cost for this segment is included in the analysis but the section is not mentioned.	The EIS provides an estimate of the total cost of the ultimate project. The EIS must evaluate the ultimate project configuration, which is expected to be completed by 2035.
12	Roadway Design	The eastern end of I-485 has no direct high standard road into downtown Charlotte, making it less accessible to save travel time for motorists traveling in that direction.	See response to Comment 5 in this letter (letter p003).
13	Roadway Design	The terminus of the Connector, located south of CDIA, is less convenient for those going to the airport. Travel time will be best secured by way of I-85 or US 29/74.	See response to Comment 5 in this letter (letter p003).

Appendix C2 – Citizen Comments

Table C2-3: Dorothea Delano

Document: p003 letter dated Feb 4, 2011

COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
14	Indirect and Cumulative Effects	There is a potential for increased criminal activity because of the accessibility of another bridge, another route, connecting Gaston to Mecklenburg Counties.	See response to Comment 7 in this letter (letter p003).
15	Indirect and Cumulative Effects	There is a clear benefit for South Carolina, specifically for York County citizens, economically and with travel time savings at the expense of the citizens of the State of North Carolina.	See response to Comment 8 in this letter (letter p003).
16	Land Use and Transportation Planning	Growth and land use projections and plans based on past identification needs may be untenable due to changes in the economic landscape and recent trends toward more urbanized growth with less sprawl.	See response to Comment 9 in this letter (letter p003).

From: Dorothea Delano [ddelano7@bellsouth.net]
Sent: Wednesday, February 02, 2011 3:42 PM
To: gaston@ncturnpike.org
Cc: donnieloftis@bellsouth.net; tracy@tracyphilbeck.com; KINGSPINNACLE@aol.com; chad.brown@co.gaston.nc.us; mprice@co.gaston.nc.us; tomkcom@aol.com; afraley@carolina.rr.com
Subject: Comments on FEIS for EW Connector

North Carolina Turnpike Authority,

The following are comments on the East/West Connector and the final Environmental Impact Statement.

Noise (FEIS Section 2.5.2)

- 1 [Noise Barrier/receptors will be required at eleven subdivisions. The necessity of these barriers will negatively impact the aesthetic nature, land values and quality of life of the people living in the vicinity. The Belmont Peninsular will be hit with 31 barrier/ receptors at the Brook Forest subdivision northwest of the NC273 Gaston interchange and 22 northeast of the NC273 Gaston interchange - not exactly what the city leaders had in mind 20 - 25 years ago.

Accessibility (FEIS Section 2.5.5.6)

- 2 [The southern location of the E/W Connector at I-485 makes it less useful and less accessible for those who use the airport from Gaston and Cleveland Counties. US 29/74 is the primary and most direct route to reach the airport.
- 3 [Since the E/W Connector will end at I-485, it will not be beneficially accessible for motorists traveling from Gaston and Cleveland Counties because there will not be a high standard road leading into downtown Charlotte.
- 4 [The connectivity of Gaston County with Mecklenburg County by means of another bridge across the Catawba River will increase accessibility for those who engage in negative opportunistic activities - from Mecklenburg to Gaston County and vice versa. The Belmont Peninsula will be vulnerable. From ancient times to the present this is a recorded fact in the history of mankind. For instance, the first interchange into Belmont from Mecklenburg County from I-85 and from US 29/74 has had robberies near that locale. The Peninsula doesn't need another bridge to cross the Catawba with the potential of opening up another avenue for this type of activity.
- 5 [York County, SC and South Carolina stand to benefit handsomely with the construction of the E/W Connector. York County will get a direct route to I-485 and the CIDA, save travel times and reduce the number of vehicles on some roads such as SC 49. York County may even save on road maintenance costs. South Carolina will get her much needed road for York County that will be built and financed by North Caroliana.

Land Use (FEIS Section 2.5.6)

- 6 ["York County, South Carolina's 2025 plan calls for...concentrations of commercial and industrial land along US 321". According to the document, "this in inconsistent with the plan of maintaining a primarily rural character in this area".
- York County will benefit again by drawing employment into that area. We need to keep the money and jobs here in Gaston County!
- The land use plan in this document calls for residential development with some mixed use throughout southeastern and south-central Gaston County. (Draft Summary & Updates EIS P. 1-50).

The concept for this road goes back 20 - 25 years. A whole generation has come up since then. At this point in time, the idea has lost its prime, which currently favors smaller homes in a more urban type setting with convenient access to amenities.

Summary and Conclusion

- 7 [Noise barriers will negatively impact affected communities.
- 8 [The terminus of the Connector, located south of CDIA, is less convenient for those going to the airport.
- 9 [The eastern end of I-485 has no direct high standard road into downtown Charlotte making it less accessible for motorists traveling in that direction.
- 10 [There is a potential for increased criminal activity because of the accessibility of another bridge, another route, connecting Gaston to Mecklenburg Counties.
- 11 [There is a clear benefit for South Carolina, specifically for York County citizens, economically and with travel time savings, at the expense of the State of North Carolina.
- 12 [Growth and land use projections and plans based on past identification needs may be untenable due to changes in the economic landscape and to recent trends toward mor urbanized growth with less sprawl.

There is not convincing justification for the E/W Connector. The top priority imperative to build this road has negatively affected the overall infrastructure of Gaston County. Meanwhile, there is the US 29/74-Catawba River Bridge that needs to be rebuilt with room for the many bicyclists who use it, yet the funding for it is through 2025; there is the dangerous US 321 interchange that should be an urgent priority to redesign in light of the fact that truckers want toe restriction lifted on US321 to allow for twin tractor trailers; the Robinson-Clemmer Road/Friday Park Road widening should be studied; the I-85 bottleneck at the Belmont interchange needs widening along with other roads on the funding list such as NC 274 and NC 279; South Point Road to Lower Armstrong Rd. (US 273) is unfunded and should be funded due to heavy traffic on this two lane road.

Dorothea Delano February 2, 2011

Appendix C2 – Citizen Comments

Table C2-4: Dorothea Delano

Document: p004 email dated Feb 2, 2011

COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
1	Noise	Noise Barrier/receptors will be required at eleven subdivisions. The necessity of these barriers will negatively impact the aesthetic nature, land values and quality of life of the people living in the vicinity. The Belmont Peninsular will be hit with 31 barrier/ receptors at the Brook Forest subdivision northwest of the NC273 Gaston interchange and 22 northeast of the NC273 Gaston interchange - not exactly what the city leaders had in mind 20 - 25 years ago.	See response to Comment 2 in Ms. Dorothea Delano's letter (letter p003).
2	Roadway Design	The southern location of the E/W Connector at I-485 makes it less useful and less accessible for those who use the airport from Gaston and Cleveland Counties. US 29/74 is the primary and most direct route to reach the airport.	See response to Comment 5 in Ms. Dorothea Delano's letter (letter p003).
3	Roadway Design	Since the E/W Connector will end at I-485, it will not be beneficially accessible for motorists traveling from Gaston and Cleveland Counties because there will not be a high standard road leading into downtown Charlotte.	See response to Comment 5 in Ms. Dorothea Delano's letter (letter p003).
4	Indirect and Cumulative Effects	The connectivity of Gaston County with Mecklenburg County by means of another bridge across the Catawba River will increase accessibility for those who engage in negative opportunistic activities - from Mecklenburg to Gaston County and vice versa. The Belmont Peninsula will be vulnerable. From ancient times to the present this is a recorded fact in the history of mankind. For instance, the first interchange into Belmont from Mecklenburg County from I-85 and from US 29/74 has had robberies near that locale. The Peninsula doesn't need another bridge to cross the Catawba with the potential of opening up another avenue for this type of activity.	See response to Comment 7 in Ms. Dorothea Delano's letter (letter p003).
5	Indirect and Cumulative Effects	York County, SC and South Carolina stand to benefit handsomely with the construction of the E/W Connector. York County will get a direct route to I-485 and the CIDA, save travel times and reduce the number of vehicles on some roads such as SC 49. York County may even save on road maintenance costs. South Carolina will get her much needed road for York County that will be built and financed by North Carolina.	See response to Comment 8 in Ms. Dorothea Delano's letter (letter p003).
6	Indirect and Cumulative Effects	York County will benefit again by drawing employment into that area. We need to keep the money and jobs here in Gaston County!	The quantitative estimates of the indirect and cumulative effects of the project on land use in the study area are summarized in Section 2.5.5 of the Final EIS and updated in ROD Section 3.5 . The increased accessibility created by the new location route through southern Gaston County also would increase accessibility to portions of York County, and may increase the attractiveness of both southern Gaston County and northern York County for development.

Appendix C2 – Citizen Comments

Table C2-4: Dorothea Delano

Document: p004 email dated Feb 2, 2011

COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
7	Noise	Noise barriers will negatively impact affected communities.	See response to Comment 10 in Ms. Dorothea Delano's letter (letter p003).
8	Roadway Design	The terminus of the Connector, located south of CDIA, is less convenient for those going to the airport.	General public patrons of the Charlotte-Douglas International Airport would access the airport from the Gaston East-West Connector by traveling north on I-485 to east on I-85 or by continuing on West Boulevard to north on Billy Graham Parkway.
9	Land Use and Transportation Planning	The eastern end of I-485 has no direct high standard road into downtown Charlotte making it less accessible for motorists traveling in that direction.	See response to Comment 5 in Ms. Dorothea Delano's letter (letter p003).
10	Indirect and Cumulative Effects	There is a potential for increased criminal activity because of the accessibility of another bridge, another route, connecting Gaston to Mecklenburg Counties.	See response to Comment 7 in Ms. Dorothea Delano's letter (letter p003).
11	Indirect and Cumulative Effects	There is a clear benefit for South Carolina, specifically for York County citizens, economically and with travel time savings, at the expense of the State of North Carolina.	See response to Comment 8 in Ms. Dorothea Delano's letter (letter p003).
12	Land Use and Transportation Planning	Growth and land use projections and plans based on past identification needs may be untenable due to changes in the economic landscape and to recent trends toward more urbanized growth with less sprawl.	See response to Comment 9 in Ms. Dorothea Delano's letter (letter p003).

From: Dorothea Delano [ddelano7@bellsouth.net]
Sent: Saturday, February 12, 2011 4:00 PM
To: Bernie Yacobucci; gaston@ncturnpike.org
Subject: Gleanings and comments on FEIS for E W Connector

Members of the Gaston Metropolitan Planning Organization and Gaston NC Turnpike Authority,

The following are gleanings and comments regarding the Final Environmental Impact Statement of the proposed Gaston East-West Connector. They express the absence of information or the other side of the story.

- 1 | • It does not mention a 5-mile, 2-lane road extending from US 321 to I-85 west of Gastonia when reporting the speed limit of 70 mph with posted speed of 65 mph.
- 2 | • It does not mention this 5-mile, 2-lane segment when reporting the cost to build the road even though it was a major change in the design of the Parkway and was part of the cost reduction strategy in order to complete the project to I-85
- 3 | • It does not mention potential negative consequences of another bridge into Belmont, this one leading right into the residential peninsula. Belmont already has two Catawba River crossings and there have been problems at the first interchange into Belmont.
- 3 | • It did not review, in my judgment, the # 1 priority status and Strategic Highway Corridor designation of the East-West Connector.

This proposed Parkway has had a #1 priority classification and Strategic Highway Corridor designation since Sept 2, 2004, almost 5 1/2 years. (DEIS, 2009, Sec. 1.4.2.2 p 1-5; Sec. 1.8.1.1 p. 1-20). This designation has pulled road project needs into southern Gaston County. The consequences are seen and experienced particularly in the main east-west artery, I-85 and the US321/I-85 interchange. Sadly, the US 321/29/74 interchange is classified a 2nd priority. The gridlock that seems to be predicted is here, now. It will continue unless serious attention is given to the main east-west arteries.

- 4 | • It does not admit, because of its subjectivity, that the noise barriers at the 11 subdivisions may have a negative impact on the aesthetic nature, land values and quality of life of people living in the vicinity. For instance, the Brook Forest subdivision on the west side of NC 273 will have 31 of these barriers; the other side of NC 273 will have 22. They will range in height from 14 - 20 feet. (FEIS Sec. 2.5.2.1 pp 2-29 to 2-32).
- 4 | • It omits the visual impact that the 11 subdivisions will have because of the need for the 14 - 20 foot high noise barriers. Visual impacts refer only to neighborhoods exposed to the roadway. In that case, the neighborhoods of all the alternatives are similarly visually impacted. (Draft EIS Summary & Updates Sec. 1.3.2.5 p. 1-33; FEIS Sec. 2.5.5.1).

- 5 | • It does not mention that higher levels of air toxins may remain high due to the increased vehicle forecasts to 57,000 vpd in 2030 and therefore, may not meet EPA lower emission standards. (Long Range Transportation Plan 2035 p. 6-32; FEIS 2.5.5.2 p 2-34).

6 | We don't meet the standards now. The NCTA was making a lot of assumptions on air quality. It stated on p.2-34 of Sec. 2.5.5.2 that "on a regional basis, EPA's vehicle and fuel regulations, coupled with fleet turnover, will over time cause substantial reductions that, in almost all cases, will cause region-wide mobile source air toxin levels to be significantly lower than today".

- 7 | • It does not reveal that the eastern terminus of the Parkway at I-485 will not be useful for motorists traveling from Gaston County into downtown Charlotte. True, there will be a relocated West Boulevard connection. But this is an airport project related to the expansion of their runway. The primary and most direct and accessible route remains US 29/74. (Toll Road News posted Nov. 21, 2009)
- 7 | • It does not reveal that the eastern terminus of the Parkway, with a location south of the CDIA, will not be useful for motorists from Gaston County who need to go to the airport. Again, the primary and most accessible route to the airport will be US 29/74 and I-85. (Toll Road News posted Nov. 21, 2009).
- 8 | • It does not reveal that York County and South Carolina stand to benefit handsomely by this parkway. York County will get a direct route to I-485 and the airport via US 321 and SC 557 to NC 273, NC 274 and NC 279. York County County will also save on travel time and reduced number of vehicles on some roads such as US 49 - all at the expense of the Sate of North Carolina who will build and finance it.
- 9 | • It ignores the real purpose of the Parkway. The repeatedly stated purpose of this road, "connectivity between Gaston and Mecklenburg County" and "limited crossings of the Catawba River", is a thin veneer covering the real purpose which is "residential development ...throughout southeastern and south-central Gaston County, with some mixed uses..." a plan tthat is 20 - 25 years old.

In my judgment, this development plan/purpose is bolstered by the fact that there will not be a direct high standard road leading into downtown Charlotte. In addition, the southern location of the eastern end of the Connector at I-485 will not be as useful as US 29/74 and I-85. When you consider the number of people who drive into Charlotte for work, > 23,000 per 2000 census, I have to ask just who is going to benefit by this.

With Norfolk Southern and the air cargo terminal at CDIA expanding, there undoubtedly will be warehouse and distribution centers at I-485. If so, Mecklenburg County will get the tax revenue.

As I see it there will be 4 beneficiaries for this road:

1. Those traveling south on I-485
2. West Mecklenburg County around Norfolk Southern and CDIA air cargo facilities for the warehouse and distribution centers that they will generate along I-485.
3. York County and South Carolina. They get a free road..
4. Developers in the southern Gaston County region.

Dot Delano

Mrs. Dorothea Delano
 PO 1306
 Belmont, NC 28012
 February 13, 2011

Mr. John F. Sullivan, III, PE
 Federal Highway Administration
 310 New Bern Avenue, Suite 410
 Raleigh, NC 27601-1418

The following are gleanings and comments regarding the Final Environmental Impact Statement of the proposed Gaston East-West Connector. They express the absence of information or the other side of the story.

- 1 rep [• It does not mention a 5-mile, 2-lane road extending from US 321 to I-85 west of Gastonia when reporting the speed limit of 70 mph with posted speed of 65 mph.
- It does not mention this 5-mile, 2-lane segment when reporting the cost to build the road even though it was a major change in the design of the Parkway and was part of the cost reduction strategy in order to complete the project to I-85.
- 3 rep [• It did not review, in my judgment, the #1 priority status and Strategic Highway Corridor designation of the East-West Connector.

This proposed Parkway has had a #1 priority classification and Strategic Highway Corridor designation since Sept. 2, 2004 - almost 6 ½ years. (DEIS, 2009, Sec.1.4.2.2 p.1-5; Sec. 1.8.1.1 p> 1-20). This designation has pulled road project needs into southern Gaston County. The consequences are seen and experienced particularly in the main east-west artery, I-85 and it's US 321/I-85 interchange. Sadly, this interchange is classified a 2nd priority. The gridlock that seems to be predicted is here, now. It will continue unless serious attention is given to the main east-west arteries.

- 4 rep [• It does not admit, because of its subjectivity, that the noise barriers at the 11 subdivisions may have a negative impact on the aesthetic nature, land values and quality of life of people living in the vicinity. For instance, the Brook forest subdivision in Belmont will have 31 barriers on the west side of NC 273; the other side of NC will have 22. They will range in height from 14 - 29 feet. (FEIS Sec. 2.5.2.1 pp.2-29 to 2-32).
- It omit's the visual impact that the 11 subdivisions will have because of the need for the 14 - 20 foot noise barriers. Visual impacts refer only to neighborhoods exposed to the roadway. In that case, the neighborhoods of all the alternatives are similarly visually impacted. (Draft EIS Summary & Updates Sec. 1.3.2.5 p. 1-33; FEIS Sec.2.5.5.1).
- 5 rep [• It does not mention that higher levels of air toxins may remain high due to the increased vehicle forecasts to 57,000 vpd in 2030 and therefore, may not meet EPA lower emission standards. (Long Range Transportation Plan 2035 p. 6-32; FEIS 2.5.5.2 p.2-34).

- 6 rep [We don't meet the standards now. The NCTA was making a lot of assumptions on air quality when it was stated on p. 2-34 of Sec. 2.5.5.2 that "on a regional basis, EPA's vehicle and fuel regulations, coupled with fleet turnover, will over time cause substantial reductions that, in

6 rep | almost all cases, will cause region-wide mobile source air toxin levels to be significantly lower than today”.

- 7 rep • It does not reveal that the eastern terminus of the Parkway at I-485 will not be useful for motorists traveling from Gaston County into downtown Charlotte, True; there will be a relocated West Boulevard connection. But this is an airport project related to the expansion of their runway. The primary and most direct and accessible route remains US 29/74. (Toll Road News posted Nov. 21, 2009) See Fig. 2-3q of FEIS, enclosed).
- 8 rep • It does not reveal that the eastern terminus of the Parkway, with a location south of the CDIA, will not be useful for motorists from Gaston County who need to go to the airport. Again, the primary and most accessible route to the airport is I-85 and US 29/74. (ibid.).
- 8 rep • It does not reveal that York County and South Carolina stand to benefit handsomely by this parkway. York County will get a direct route to I-485 and the airport via US 321 and SC 557 to NC 273, NC 274 and NC 279. York County will also save on travel time and reduced number of vehicles on some roads such as US 49 - all at the expense of the State of North Carolina who will build and finance it.
- 9 rep • It ignores the real purpose of the Parkway. The repeatedly stated purpose of this road, “connectivity between Gaston and Mecklenburg County” and “limited crossings of the Catawba River”, is a thin veneer covering the real purpose which is “residential development...throughout southeastern and south-central Gaston County, with some mixed uses...” a plan that is 20 - 25 years old.

In my judgment, this development plan/purpose is promoted even though there will not be a direct high standard road leading into downtown Charlotte, In addition, the southern location of the eastern end of the Connector at I-485 will not be as useful as US 29/74 and I-85. True, the Connector will connect to Mecklenburg but there is important information left out.

When you consider the number of people who drive into Mecklenburg County per day, >23,000 per 2000 census, I have to ask just who is going to benefit by this. (Gaston E-W Connector DEIS Table 1.1 p.1-9)

With Norfolk Southern and the air cargo terminal at CDIA expanding, there undoubtedly will be warehouse and distribution centers at I-485. If so, Mecklenburg County will get the tax revenue.

As I see it, there will be 4 beneficiaries for this road:

1. Those traveling south on I-485;
2. West Mecklenburg County around Norfolk Southern and CDIA air cargo facilities for the warehouse and distribution centers that they will generate along I-485;
3. York County and South Carolina. They get a free road;
4. Developers in the southern Gaston County region.

I ask you to please consider these comments when you evaluate the Gaston FEIS document.

Dot Delano

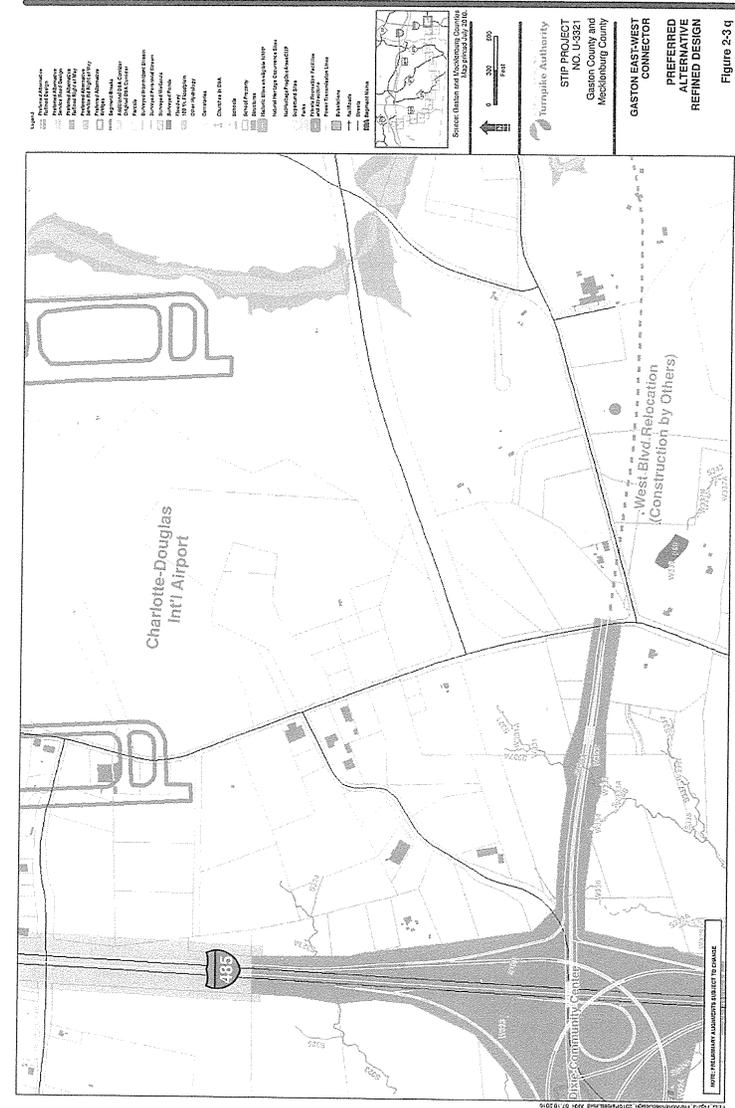


Figure 2-3q

Appendix C2 – Citizen Comments

Table C2-5: Dorothea Delano

Document: p005 email dated Feb 12, 2011

COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
1	Roadway Design	<p>It does not mention a 5-mile, 2-lane road extending from US 321 to I-85 west of Gastonia when reporting the speed limit of 70 mph with posted speed of 65 mph.</p> <p>It does not mention this 5-mile, 2-lane segment when reporting the cost to build the road even though it was a major change in the design of the Parkway and was part of the cost reduction strategy in order to complete the project to I-85</p>	The EIS must evaluate the ultimate project configuration, which is expected to be completed by 2035. Constructing the segment from I-85 to US 321 as two lanes would be an interim project phase. The EIS provides an estimate of the total cost of the ultimate project.
2	Indirect and Cumulative Effects	It does not mention potential negative consequences of another bridge into Belmont, this one leading right into the residential peninsula. Belmont already has two Catawba River crossings and there have been problems at the first interchange into Belmont.	See response to Comment 7 in Ms. Dorothea Delano's letter (letter p003).
3	Land Use and Transportation Planning	It did not review, in my judgment, the # 1 priority status and Strategic Highway Corridor designation of the East-West Connector.	Draft EIS Section 1.8.1.2 discusses the Strategic Highway Corridor plan. Draft EIS Section 1.8.2.2 discusses the project's priority status in the GUAMPO 2030 Long Range Transportation Plan (LRTP). The Final EIS incorporates the Draft EIS by reference (Final EIS Section P.3) and updates information as applicable. The project's designations in the latest GUAMPO 2035 LRTP and Strategic Highway Corridor Plan have not changed.
4	Noise	<p>It does not admit, because of its subjectivity, that the noise barriers at the 11 subdivisions may have a negative impact on the aesthetic nature, land values and quality of life of people living in the vicinity. For instance, the Brook Forest subdivision on the west side of NC 273 will have 31 of these barriers; the other side of NC 273 will have 22. They will range in height from 14 - 20 feet. (FEIS Sec. 2.5.2.1 pp 2-29 to 2-32).</p> <p>It omits the visual impact that the 11 subdivisions will have because of the need for the 14 - 20 foot high noise barriers. Visual impacts refer only to neighborhoods exposed to the roadway. In that case, the neighborhoods of all the alternatives are similarly visually impacted. (Draft EIS Summary & Updates Sec. 1.3.2.5 p. 1-33; FEIS Sec. 2.5.5.1).</p>	See response to Comment 2 in Ms. Dorothea Delano's letter (letter p003).
5	Air Quality	It does not mention that higher levels of air toxins may remain high due to the increased vehicle forecasts to 57,000 vpd in 2030 and therefore, may not meet EPA lower emission standards. (Long Range Transportation Plan 2035 p. 6-32; FEIS 2.5.5.2 p 2-34).	As discussed in Final EIS Section 2.5.2.2, it is expected that there would be higher MSAT emissions in the immediate project area, relative to the No-Build Alternative, due to increased VMT. In comparing all alternatives in the Draft EIS, MSAT levels could be slightly higher in some locations than others, but current tools and science are not adequate to quantify them or the risks to human health. However, on a regional basis, EPA's vehicle and fuel regulations, coupled with fleet turnover, will over time cause substantial reductions that, in almost all cases, will cause region-wide MSAT levels to be significantly lower than today.

Appendix C2 – Citizen Comments

Table C2-5: Dorothea Delano

Document: p005 email dated Feb 12, 2011

COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
6	Air Quality	We don't meet the standards now. The NCTA was making a lot of assumptions on air quality. It stated on p.2-34 of Sec. 2.5.5.2 that "on a regional basis, EPA's vehicle and fuel regulations, coupled with fleet turnover, will over time cause substantial reductions that, in almost all cases, will cause region-wide mobile source air toxin levels to be significantly lower than today".	The GUAMPO 2035 Long Range Transportation Plan and the municipal Transportation Improvement Program have been found by EPA to conform to the State Implementation Plan for achieving and maintaining National Ambient Air Quality Standards (Final EIS Section 2.5.2.2).
7	Land Use and Transportation Planning	It does not reveal that the eastern terminus of the Parkway at I-485 will not be useful for motorists traveling from Gaston County into downtown Charlotte. True, there will be a relocated West Boulevard connection. But this is an airport project related to the expansion of their runway. The primary and most direct and accessible route remains US 29/74. (Toll Road News posted Nov. 21, 2009) It does not reveal that the eastern terminus of the Parkway, with a location south of the CDIA, will not be useful for motorists from Gaston County who need to go to the airport. Again, the primary and most accessible route to the airport will be US 29/74 and I-85. (Toll Road News posted Nov. 21, 2009).	The Gaston East-West Connector will end at an interstate, I-485. Motorists traveling east to the end of the proposed project will have many destinations, including uptown Charlotte. From the project interchange at I-485, travelers can get to uptown Charlotte by continuing straight on West Boulevard or by going north on I-485 to I-85 then I-77 or going south on I-485 to I-77. General public patrons of the Charlotte-Douglas International Airport would access the airport from the Gaston East-West Connector by traveling north on I-485 to east on I-85 or by continuing on West Boulevard to north on Billy Graham Parkway.
8	Traffic and Travel Demand Modeling	It does not reveal that York County and South Carolina stand to benefit handsomely by this parkway. York County will get a direct route to I-485 and the airport via US 321 and SC 557 to NC 273, NC 274 and NC 279. York County will also save on travel time and reduced number of vehicles on some roads such as US 49 - all at the expense of the State of North Carolina who will build and finance it.	See response to Comment 8 in Ms. Dorothea Delano's letter (letter p003).
9	Purpose and Need	It ignores the real purpose of the Parkway. The repeatedly stated purpose of this road, "connectivity between Gaston and Mecklenburg County" and "limited crossings of the Catawba River", is a thin veneer covering the real purpose which is "residential development ...throughout southeastern and south-central Gaston County, with some mixed uses..." a plan that is 20 - 25 years old.	The purpose of the project, as described in Final EIS Section 1.1.3 is to "improve east-west transportation mobility in the area around the City of Gastonia, between Gastonia and the Charlotte metropolitan area, and particularly to establish direct access between the rapidly growing area of southeast Gaston County and western Mecklenburg County." The quantitative indirect and cumulative effects study summarized in Final EIS Section 2.5 (and updated in ROD Section 3.5) evaluates the potential effects or influence increased accessibility and mobility the project may have on area land uses. Actual land use changes also will depend on numerous other factors such as zoning decisions made by local governments, market conditions, economic conditions, availability of water/sewer, etc.

From: John Alexander [thewiz4@att.net]
Sent: Wednesday, February 09, 2011 10:05 PM
To: gaston@ncturnpike.org
Cc: William Toole
Subject: Gaston County Toll Road

In my opinion spending money to construct the proposed toll road in Gaston County is a colossal waste that will benefit only special interests like Stowe Gardens, real-estate developers, and construction companies.

Gaston County has real transportation problems, like the 321 interchange and sections of I-85 that need to be widened, that need to be addressed. So why are some elected officials so committed to building this toll road? Or should I ask who stands to benefit the most? And, of course, there is the ultimate underlying question - how are "We the People" going to get screwed in this deal?

1 [Gaston County needs jobs just like many other parts of the country. So why doesn't the Transportation Department set out to fix and improve existing thoroughfares in Gaston County instead of constructing a new road that will only benefit a few well-connected individuals at the expense of the rest of us.

2 [From the recent publicity that I have read it sounds like transportation officials have been "cooking" the job-loss numbers. Wonder what is behind this effort to obfuscate the number of jobs that Gaston County will lose and that will go to South Carolina? Does someone with the Transportation Department have some skin in this game that "We the People" don't know about? Kinda makes you scratch your head and go "Mmmmmmm!!!"

Please stop your efforts to build this toll road and redirect your energies to improving existing roads in Gaston County, keeping the jobs and the money here rather than in South Carolina.

Thanks,

John Alexander

Appendix C2 – Citizen Comments

Table C2-6: John Alexander

Document: p006 email dated Feb 9, 2011

COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
1	Alternatives Considered	Gaston County needs jobs just like many other parts of the country. So why doesn't the Transportation Department set out to fix and improve existing thoroughfares in Gaston County instead of constructing a new road that will only benefit a few well-connected individuals at the expense of the rest of us.	The GUAMPO 2035 Long Range Transportation Plan provides a comprehensive plan for improving the region's transportation network. The Gaston East-West Connector is one of many projects included in this plan.
2	Indirect and Cumulative Effects	From the recent publicity that I have read it sounds like transportation officials have been "cooking" the job-loss numbers. Wonder what is behind this effort to obfuscate the number of jobs that Gaston County will lose and that will go to South Carolina? Does someone with the Transportation Department have some skin in this game that "We the People" don't know about? Kinda makes you scratch your head and go "Mmmmmmm!!"	See responses to Comments 38 and 39 in the Southern Environmental Law Center's letter (letter p001).

From: Tina Medlin [jrmedlin@mindspring.com]
Sent: Tuesday, February 22, 2011 5:42 PM
To: gaston@ncturnpike.org
Subject: Comments to the FEIS

1 [Even though the FEIS is intended to be a standalone document presenting the impacts to the environment, including the citizens and economy, its presentation is dependent on other data and documents. Many of these are not currently available for scrutiny and validation. Without them, the FEIS is simply rhetoric without substance. Until the presentation of the data is complete, the FEIS should not be approved and considered a basis for proceeding with the project. See the following deficits:

2 [• To the average user of I-85, widening I-85 from the Belmont Abbey exit to US-321 seems to be the best option for relieving I-85 congestion into and through Gaston County. Where is the supporting data that this and other options are not viable? The FEIS simply states that the other options don't meet the stated purpose of the project. There has not been data presented supporting these conclusions. However, the presented data does support a conclusion that the Toll road does not meet all the stated purposes, even though it is stated otherwise in the document.

3 [• The media has reported that the project has lost the federal funding they were hoping for, so the project continues to need NC taxpayer money, now more so than ever. Since data is needed to make an informed decision, why has the "Revenue and Demand Study" not been put out for public review and scrutiny? How do regulators and tax payers know that even the ridiculous \$35MM for 40 years is sufficient for the gap funding? The impact to the economy of such a project will be felt for decades. Surely, this knowledge is necessary for an accurate assessment of the document and the future of the project.

4 [• Why has the estimated travel use data not been made public, even though the field data collection has long since been completed? How can the validity of the study and its stated conclusions be determined without supporting data?

5 [The media has also exposed information indicating that Gaston County job loss data in the FEIS has been minimized for political reasons. Will there be a revision of the "Final" EIS issued to provide an accurate representation of the data? This single intentional error in methodology leads to potential invalidity of the entire presentation.

In conclusion, the review and approval of the FEIS should be put on hold until all of the supporting data has been accurately developed in an unbiased fashion, incorporated, and presented for the scrutiny of taxpayer and regulators.

Appendix C2 – Citizen Comments

Table C2-7: Tina Medlin

Document: p007 email dated Feb 22, 2011

COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
1	Editorial	Even though the FEIS is intended to be a standalone document presenting the impacts to the environment, including the citizens and economy, its presentation is dependent on other data and documents. Many of these are not currently available for scrutiny and validation. Without them, the FEIS is simply rhetoric without substance.	Final EIS Section 6.2 provides a list of supporting project documentation, including technical memoranda and reports incorporated by reference into the Draft EIS and Final EIS. These are available for review upon request by contacting the NCTA via email at gaston@ncturnpike.org or via telephone at (919) 571-3000. Documents also available on the NCTA Web site (www.ncdot.org/projects/gardenparkway) are marked with an asterisk (*) in Section 6.2.
2	Alternatives Considered	To the average user of I-85, widening I-85 from the Belmont Abbey exit to US-321 seems to be the best option for relieving I-85 congestion into and through Gaston County. Where is the supporting data that this and other options are not viable? The FEIS simply states that the other options don't meet the stated purpose of the project. There has not been data presented supporting these conclusions. However, the presented data does support a conclusion that the Toll road does not meet all the stated purposes, even though it is stated otherwise in the document.	The Draft EIS Chapter 2 and the <i>Addendum to the Final Alternatives Development and Evaluation Report for the Gaston East-West Connector</i> (October 2008) provide details regarding the evaluation of alternatives, and the reasons alternatives were eliminated or retained for detailed study, including Improve Existing Roadways Alternatives. No new information was presented after publication of the Draft EIS that warranted additional evaluation of alternatives other than the Preferred Alternative described in the Final EIS.
3	Traffic and Travel Demand Modeling	The media has reported that the project has lost the federal funding they were hoping for, so the project continues to need NC taxpayer money, now more so than ever. Since data is needed to make an informed decision, why has the "Revenue and Demand Study" not been put out for public review and scrutiny?	An updated traffic and revenue study is currently underway and will be made available on the NCTA Web site for public review upon completion.
4	Traffic and Travel Demand Modeling	Why has the estimated travel use data not been made public, even though the field data collection has long since been completed? How can the validity of the study and its stated conclusions be determined without supporting data?	See response to Comment 3 in this letter (letter p007). As discussed in Draft EIS Section 2.4.4.1, two travel demand forecasts were prepared for the Detailed Study Alternatives, the NEPA Forecasts and the Traffic and Revenue Forecast. The NEPA Forecast is prepared to evaluate impacts and determine the design of the facility using standard procedures for FHWA NEPA documents. The Traffic and Revenue Forecast is a separate forecast used for predicting revenue. Traffic volumes along the proposed roadway from the Traffic and Revenue Forecast are usually lower than the traffic volumes from the NEPA Forecast so that potential revenue is not overstated. An updated NEPA Forecast was prepared for the Preferred Alternative as described in Final EIS Section 2.3.5.1. An updated traffic and revenue study is currently underway and will be made available on the NCTA Web site for public review upon completion.
5	Indirect and Cumulative Effects	The media has also exposed information indicating that Gaston County job loss data in the FEIS has been minimized for political reasons. Will there be a revision of the "Final" EIS issued to provide an accurate representation of the data? This single intentional error in methodology leads to potential invalidity of the entire presentation.	See responses to Comments 38 and 39 in the Southern Environmental Law Center's letter (letter p001).

From: Carolyn Sly [bdsly@aol.com]
Sent: Monday, February 21, 2011 10:18 PM
To: gaston@ncturnpike.org
Subject: Opposition to the Garden Parkway Toll Road

Follow Up Flag: Follow up
Flag Status: Flagged

I would like to voice my dissatisfaction with the proposed toll road in Gaston County. This is a tremendous waste of taxpayer funds. This road will not fund itself with tolls and will end up being a road that will only benefit those who invested in land along the proposed route.

1 I also feel the traffic analysis was done to benefit the Turnpike Authority. When I did the traffic simulator study where you put in one address and then picked the address you were going to, and then it asked you several questions about whether you would pay a certain amount to take less time for that route, the simulator was flawed. I picked a point that I have driven to in Charlotte for the last 8 years. I drive there every day at different times of the day. It has never taken more than 23 minutes. The traffic simulator said the route was a 42 minute one way route. Something is wrong, as I have driven this at many different times of the day and it has never taken that long. This study is flawed, and is not a good basis for the toll road justification.

Regards,
Carolyn Farr Sly
315 North Main St.
Belmont, NC 28012

Appendix C2 – Citizen Comments

Table C2-8: Carolyn Sly

Document: p008 email dated Feb 21, 2011

COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
1	Traffic and Travel Demand Modeling	I also feel the traffic analysis was done to benefit the Turnpike Authority. When I did the traffic simulator study where you put in one address and then picked the address you were going to, and then it asked you several questions about whether you would pay a certain amount to take less time for that route, the simulator was flawed. I picked a point that I have driven to in Charlotte for the last 8 years. I drive there every day at different times of the day. It has never taken more than 23 minutes. The traffic simulator said the route was a 42 minute one way route. Something is wrong, as I have driven this at many different times of the day and it has never taken that long. This study is flawed, and is not a good basis for the toll road justification.	The study mentioned was conducted as part of the investment grade traffic and revenue study for the project. The purpose of the traffic and revenue study is to determine appropriate toll rates and to support project financing assessments. Traffic information presented in the Draft EIS and Final EIS is not based on the traffic and revenue study.

From: sarmstrong20@carolina.rr.com
Sent: Tuesday, February 22, 2011 2:45 AM
To: gaston@ncturnpike.org; berniey@cityofgastonia.com
Subject: Toll Road

1 On behalf of the Myrtle school community: I'm wondering as I sit here praying that someone would hear the cries of this community, if the people who desperately seek to destroy this community ever had a dream and or determination to call home - home. You see this community is comprised of predominately single African-American females who wanted something better for their children and grandchildren. So they endured, raised their children, some grandchildren and now were ready to sit back and relax, enjoy Sunday evening with their family. They could reminisce on how they got over the struggles and proud to be able to leave this legacy behind. But now they are being told that the dream they were dreaming is only a nightmare. That 30 years of hard work mean nothing when the government decides to regroup, revamp, or "rebuild". The money that will be used is money that could revitalize the community, rejuvenate the schools, and bring restoration to those that have been without jobs for a year or more. The monies you're going to use are only going to improve the future for the officials who have under handily brought into the land only to have a prosperous future for themselves. They are pushing for this road because they feel government money is sure money for them. They haven't once stopped to think about or care about the constituents who have put their heart and soul into their home. Who have no desire to be uprooted in the senior years. It was the whole purpose for them to buy in the first place. So many of them now have retired, some are facing failing health, while others are still pressing on after choices made for their grandchildren. But none the less, this is a proud strong community. I would like for you to consider them.

Sent via BlackBerry from T-Mobile

Appendix C2 – Citizen Comments

Table C2-9: S. Armstrong

Document: p009 email dated Feb 22, 2011

COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
1	Right-of-Way Acquisition and Relocation	<p>On behalf of the Myrtle school community: I'm wondering as I sit here praying that someone would hear the cries of this community, if the people who desperately seek to destroy this community ever had a dream and or determination to call home - home. You see this community is comprised of predominately single African-American females who wanted something better for their children and grandchildren. So they endured, raised their children, some grandchildren and now were ready to sit back and relax, enjoy Sunday evening with their family. They could reminisce on how they got over the struggles and proud to be able to leave this legacy behind. But now they are being told that the dream they were dreaming is only a nightmare. That 30 years of hard work mean nothing when the government decides to regroup, revamp, or "rebuild". The money that will be used is money that could revitalize the community, rejuvenate the schools, and bring restoration to those that have been without jobs for a year or more. The monies you're going to use are only going to improve the future for the officials who have under handily brought into the land only to have a prosperous future for themselves. They are pushing for this road because they feel government money is sure money for them. They haven't once stopped to think about or care about the constituents who have put their heart and soul into their home. Who have no desire to be uprooted in the senior years. It was the whole purpose for them to buy in the first place. So many of them now have retired, some are facing failing health, while others are still pressing on after choices made for their grandchildren. But none the less, this is a proud strong community. I would like for you to consider them.</p>	<p>The Recommended Alternative and Preferred Alternative were identified based on a balance of cost and design considerations, impacts to the human and natural environments, and input received from agencies and the public, as described in the Draft EIS (Recommended Alternative) and Final EIS (Preferred Alternative). Impacts to the human, cultural, and natural environments were avoided and minimized to the extent practicable. Impacts from the Preferred Alternative to the human environment are discussed in Section 2.5.1 of the Final EIS. Also, as discussed in Section 2.3.1.2, the Preferred Alternative preliminary design was refined in the area around the Myrtle School community to provide a new access design for the Matthews Acres subdivision that more directly reconnects this subdivision to the rest of the communities along Shannon Bradley Road.</p>

From: Gurak, Jill S
Sent: Wednesday, February 23, 2011 4:37 PM
To: Gurak, Jill S
Subject: FW: No Tow Road

From: adejah03@yahoo.com [mailto:adejah03@yahoo.com]
Sent: Tuesday, February 22, 2011 11:22 PM
To: gaston@ncturnpike.org
Subject: No Tow Road

My name is Adejah Hoyle and I strongly disagree about the tow road. I dont undertand how the state can afford to build this road and destroy homes that families have struggled to pay for. There are people that are losing their jobs, elderly people that are having a hard time paying for their medicines and doctor appointments, children unable to have a good education and you want to build a road that cost millions of dollars. There are better things to focus on and many other roads that need to be repaired.

My grandmother, Ida Jackson has raised 6 children, grandchildren and great grandchildren in her house. She has also worked very hard to fix her house up and helped others in her community that she has known for years. This issue of building this road and tearing down her home filled with memories is causing her to hurt miserably. She has high blood pressure and the past couple of years has been stressing her so much and is causing her blood pressure to be out of control. Please help stop the tow road. My grandmother does not want to move, she has paid her house off and only works part time. She wants to retire, but she has to move she have to continue to work.

I hope you read this and understand the pain of my family and many others. I think other problems should be fixed before creating another.

Thank you,
Adejah Hoyle

Sent from my HTC on the Now Network from Sprint!

Appendix C2 – Citizen Comments

Table C2-10: Adejah Hoyle

Document: p010 email dated Feb 22, 2011

COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
1	Right-of-Way Acquisition and Relocation	My grandmother does not want to move, she has paid her house off and only works part time. She wants to retire, but she has to move she have to continue to work.	As discussed in Draft EIS Section 3.2.3.2 and Final EIS Section 2.5.1.2, the NCTA follows the relocation policies of the NCDOT. The policies ensure that comparable replacement housing is available for relocatees prior to construction of state and/or federally assisted projects. Furthermore, the NCTA will use three programs NCDOT has to minimize the inconvenience of relocation: Relocation Assistance, Relocation Moving Payments, and Relocation Replacement Housing Payments or Rent Supplements.

From: Carolyn Sly [bdsly@aol.com]
Sent: Monday, February 21, 2011 10:26 PM
To: gaston@ncturnpike.org
Subject: Do not agree with Garden Parkway

I want to let the Turnpike Authority know that the Garden Parkway should be removed from the list of projects proposed.

1 [Not only would it increase congestion on I-85, but it will not relieve some major traffic issues we already have in the county. I believe that this is not in the best interests of Gaston County and that there are problems with the Environmental Impact Statement as well as the fact that the traffic studies will not merit this road.

Jackie Sly
1412 Gaither Road
Belmont, NC 28012

Appendix C2 – Citizen Comments

Table C2-11: Jackie Sly

Document: p011 email dated Feb 21, 2011

COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
1	Land Use and Transportation Planning	Not only would it increase congestion on I-85, but it will not relieve some major traffic issues we already have in the county. I believe that this is not in the best interests of Gaston County and that there are problems with the Environmental Impact Statement as well as the fact that the traffic studies will not merit this road.	See response to Comment 29 in the Southern Environmental Law Center's letter (letter p001).

Subject: FW: Garden Parkway Economic Development Study
Attachments: EconomicImpactofGardenParkway.pdf

-----Original message-----

From: Kym Hunter <khunter@selcnc.org>
To: "Harris, Jennifer" <jhharris1@ncdot.gov>
Cc: "Slusser, Scott" <SSLUSSER@ncdoj.gov>, "Dewitt, Steve" <sdewitt@ncdot.gov>
Sent: Wed, Apr 20, 2011 12:53:34 GMT+00:00
Subject: Garden Parkway Economic Development Study

Dear Ms. Harris,

As you may know, yesterday Dr. John Connaughton of UNCC released the Garden Parkway Economic Development Study on behalf of the Gaston Chamber of Commerce. The study appears to suggest that the EIS did not fully account for all the growth and development that will be induced by construction of the Garden Parkway, and that levels of growth and development will, in fact, be much higher than previously anticipated.

Will FHWA and the Turnpike Authority address the differences between this new study and the EIS prior to publishing a Record of Decision for the Garden Parkway?

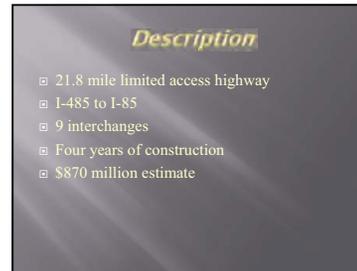
A presentation of the study results is attached to this e-mail.

Thank you,

Kym Hunter
 Associate Attorney
 Southern Environmental Law Center
 *** NEW ADDRESS***
 601 West Rosemary Street, Suite 220
 Chapel Hill, North Carolina 27516-2356
 Phone: (919) 967-1450; Fax: (919) 929-9421
 SouthernEnvironment.org

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Gaston Economy

County Population: 1980 to 2010

County	1980	1990	2000	2008*	2010
Cabarrus	85,895	98,935	131,063	170,395	178,011
Gaston	162,568	175,093	190,365	205,101	206,086
Anson	25,649	23,474	25,275	25,345	26,948
Mecklenburg	404,270	511,433	695,454	878,961	919,628
Union	70,380	84,211	123,677	191,514	201,292
York	106,720	131,497	164,614	220,219	226,073
MSA Total	855,482	1,024,643	1,330,448	1,691,535	1,758,038

Gaston Economy

County Population Percent of Total: 1980 to 2010

County	1980	1990	2000	2008*	2010
Cabarrus	10.04%	9.66%	9.85%	10.07%	10.13%
Gaston	19.00%	17.09%	14.31%	12.13%	11.72%
Anson	3.00%	2.29%	1.90%	1.50%	1.53%
Mecklenburg	47.26%	49.91%	52.27%	51.96%	52.31%
Union	8.23%	8.22%	9.30%	11.32%	11.45%
York	12.47%	12.83%	12.37%	13.02%	12.86%
MSA Total	100.00%	100.00%	100.00%	100.00%	100.00%

Gaston Economy

Total County Employment 1980-2008

County	1980	1990	2000	2008
Cabarrus	35,324	35,191	52,821	63,125
Gaston	67,413	72,861	70,768	65,344
Anson	6,542	7,404	6,219	5,344
Mecklenburg	238,593	366,224	498,694	560,059
Union	20,323	30,003	39,205	51,805
York	30,322	40,703	55,687	69,614
MSA	398,517	552,386	723,394	815,291

Gaston Economy

County Percent of MSA Total Employment 1980-2008

County	1980	1990	2000	2008
Cabarrus	8.86%	6.37%	7.30%	7.74%
Gaston	16.92%	13.19%	9.78%	8.01%
Anson	1.64%	1.34%	0.86%	0.66%
Mecklenburg	59.87%	66.30%	68.94%	68.69%
Union	5.10%	5.43%	5.42%	6.35%
York	7.61%	7.37%	7.70%	8.54%
MSA	100.00%	100.00%	100.00%	100.00%

Economic Impact of Construction

Gaston County Garden Parkway Construction Economic Impact for 2012

Multiplier Type	Direct Effects	Indirect Effects	Induced Effects	Total Effects
Employment	1,817	367	482	2,667
Output	\$186,723,750	\$32,275,013	\$47,913,128	\$266,911,891
Income	\$65,531,634	\$13,446,351	\$16,560,156	\$95,538,140

Economic Impact of Parkway

Gaston County Population Projections: (No-Build/Build Scenarios)

Scenario	2010	2020	2030	2035
No-Build	206,086	227,124	248,063	259,245
Build Base	206,086	231,356	259,407	274,683
Build Alternative	206,086	234,471	269,217	288,475

Gaston Economy

Total Employment Growth 1980-2008

County	1980-90	1990-00	2000-08	1980-2008
Cabarrus	-0.38%	50.10%	19.51%	78.70%
Gaston	8.08%	-2.87%	-7.66%	-3.07%
Anson	13.18%	-16.00%	-14.07%	-18.31%
Mecklenburg	53.49%	36.17%	12.31%	134.73%
Union	47.63%	30.67%	32.14%	154.91%
York	34.24%	36.81%	25.01%	129.58%
MSA	38.61%	30.96%	12.70%	104.58%

Gaston Economy

Gaston County Manufacturing and Textile Employment: 1980-2008

Item	1980	1990	2000	2008
Manufacturing Employment	42,302	36,244	24,677	14,813
Textile Employment	24,735	17,139	9,118	3,951
Apparel Employment	1,714	2,460	630	15
Manufacturing Establishments	420	480	436	331
Textile Establishments	101	99	83	38
Apparel Establishments	21	26	15	3

Economic Impact of Parkway

Gaston County Household Projections: (No-Build/Build Scenarios)

Scenario	2010	2020	2030	2035
No-Build	79,867	88,020	96,135	100,468
Build Base	79,867	89,660	100,531	106,451
Build Alternative	79,867	90,867	104,333	111,796

Economic Impact of Parkway

Gaston County Employment Projections: (No-Build/Build Scenarios)

Scenario	2008	2020	2030	2035
No-Build	65,344	75,010	84,148	89,127
Build Base	65,344	77,759	93,743	102,928
Build Alternative	65,344	78,508	96,480	106,955

Gaston Economy

Non-Manufacturing Employment 1980-2008

County	1980	1990	2000	2008
Cabarrus	12,037	20,840	39,767	55,368
Gaston	25,111	36,617	46,091	50,531
Anson	4,308	4,462	2,886	1,462
Mecklenburg	216,946	340,692	461,288	530,944
Union	10,646	16,485	26,003	40,541
York	14,638	26,558	51,716	59,557
MSA	116,905	108,252	95,196	74,468

Economic Impact of Construction

Gaston County IMPLAN Adjusted Multipliers for 2012 (IMPLAN Code 36)

Multiplier Type	Direct Effects	Indirect Effects	Induced Effects	Total Effects
Employment*	9.730904	1.967891	2.583911	14.282705
Output	1.000000	0.172849	0.256599	1.429448
Income	0.350955	0.072012	0.088688	0.511656

* Jobs per \$1,000,000 of expenditures

Conclusions

- Gaston County has experienced a significant economic structural change in its economy over the past three decades. Resulting in a loss of 38,000 manufacturing jobs and 20,000 textile jobs.
- Gaston County has not participated in the strong economic growth of the Charlotte MSA over the past 30 years. It has lagged behind in both population and employment compared to Cabarrus, Union, and York.
- Much of this three decade long weak economic performance has been a result of geographic isolation compared to Cabarrus, Union, and York.

Conclusions

- The construction of the Garden Parkway will lessen considerably the geographic isolation of Gaston County and allow the county to participate in the overall economic growth of the Charlotte MSA.
- During the four years of highway construction, Gaston County employment should experience over 2,600 additional jobs.
- With the construction of the Garden Parkway, Gaston County population by 2035 should reach 274,683 under the Build base Scenario, or 288,475 under the Build alternative Scenario, compared to 259,245 under the No-Build Scenario.

p025

Conclusions

- With the construction of the Garden Parkway, the number of Gaston County households by 2035 should reach 106,451 under the Build base Scenario, or 111,796 under the Build alternative Scenario, compared to 100,468 under the No-Build Scenario.
- With the construction of the Garden Parkway, Gaston County employment by 2035 should reach 102,928 under the Build base Scenario, or 106,955 under the Build alternative Scenario, compared to 89,127 under the No-Build Scenario.
- The construction of the Garden Parkway has the potential to change the future economic fortunes of Gaston County.



Appendix C2 – Citizen Comments

Table C2-12: Southern Environmental Law Center

Document: p025 email dated Apr 20, 2011

COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
1	Indirect and Cumulative Effects	<p>As you may know, yesterday Dr. John Connaughton of UNCC released the Garden Parkway Economic Development Study on behalf of the Gaston Chamber of Commerce. The study appears to suggest that the EIS did not fully account for all the growth and development that will be induced by construction of the Garden Parkway, and that levels of growth and development will, in fact, be much higher than previously anticipated.</p> <p>Will FHWA and the Turnpike Authority address the differences between this new study and the EIS prior to publishing a Record of Decision for the Garden Parkway?</p>	<p>The lead agencies carefully reviewed and considered the referenced study titled <i>Economic Impact of the Garden Parkway</i> (John E. Connaughton, Ph.D., April 28, 2011) prepared at the request of the Gaston Chamber of Commerce.</p> <p>In a general comparison of Mr. Connaughton’s study with the <i>Quantitative Indirect and Cumulative Effects Assessment</i> prepared by Louis Berger Group for the Gaston East-West Connector, Mr. Connaughton’s study has a different purpose, uses different methodologies and assumptions, and evaluates a different study area. Due to these major differences, the specific results of the two studies cannot be meaningfully compared.</p> <p>The <i>Quantitative Indirect and Cumulative Effects Assessment</i> provides a hard look at the indirect and cumulative effects the proposed project may have on the ICE Study Area environment, including potential effects on households and employment. The methodology and assumptions used, and explained in detail in the report, are broadly accepted for the analysis of transportation projects and are neither arbitrary nor capricious. These methodologies and assumptions were judged by the lead agencies to be appropriate for making well-informed decisions about the project. As explained in the <i>Quantitative Indirect and Cumulative Effects Assessment</i>:</p> <p style="padding-left: 40px;">“The assessment of potential indirect and cumulative effects (ICE) for the Gaston East-West Connector Project has been conducted in accordance with the eight-step process outlined in the NCDOT/NCDENR <i>Guidance on Indirect and Cumulative Impact Assessment of Transportation Projects in North Carolina</i> (NCDOT, 2001). The eight-step process presented in the NCDOT/NCDENR Guidance was based on the eight-step process developed for National Cooperative Highway Research Program (NCHRP) Report 403: <i>Guidance for Estimating the Indirect Effects of Proposed Transportation Projects</i> (Transportation Research Board, 1998). “</p> <p>Mr. Connaughton’s report was not conducted pursuant to this established guidance, nor was that the purpose of his report. Due to the significant differences in methodologies and purposes of the reports, Mr. Connaughton’s report does not provide information that would aid the transportation agencies in their NEPA process.</p>

SOUTHERN ENVIRONMENTAL LAW CENTER

Telephone 919-967-1450

601 WEST ROSEMARY STREET, SUITE 220
CHAPEL HILL, NC 27516-2356

Facsimile 919-929-9421

December 22, 2011

Mr. Eugene Conti
North Carolina Secretary of Transportation
1550 Mail Service Center
Raleigh, NC 27699-1550

VIA US MAIL AND E-MAIL

Re: Gaston East-West Connector EIS

Dear Secretary Conti:

It has now been over a year since the publication of the Final Environmental Impact Statement ("FEIS") for the Gaston East-West Connector (the "Toll Highway"). On behalf of the Catawba Riverkeeper and Clean Air Carolina, the Southern Environmental Law Center ("SELCC") submitted comments on that document on February 22, 2011, having also submitted comments on the Draft EIS in July, 2009. Since our more recent letter, additional concerns continue to be raised about the Toll Highway project from a variety of quarters. Accordingly, we offer these further comments for consideration by the North Carolina Turnpike Authority and the Federal Highway Administration (the "Transportation Agencies"). In light of the unresolved major issues outlined below and in our earlier comments, we request supplementation of the EIS prior to issuance of the Record of Decision ("ROD") for this very expensive, environmentally damaging and highly controversial proposal.

Project Purpose and Financial Plan

Our previous comments centered on the fact no documented underlying transportation purpose has been identified for the Toll Highway project. Indeed, as we have already noted, the FEIS itself demonstrates that one of the proffered primary purposes for the road—reducing congestion on I-85 and the other surrounding roadways—will not, in fact, result from construction of the Toll Highway. The lack of need for the project, coupled with its substantial price tag, has led to significant public opposition, which has continued to surface following our February 2011 comments.

During the 2011 legislative session, groups of local opponents made several trips to the legislature to voice their opposition to the Gaston East-West Connector.¹ Having listened to this opposition and reviewed the assorted issues associated with the project, the North Carolina Senate was poised to eliminate entirely its "Gap" funding,² to instead focus funds on maintenance of the existing highway system.³ Senator Kathy Harrington, who represents one of the districts that will be impacted

¹ Joe DePriest, *Garden Parkway opponents lobby legislators in Raleigh*, Charlotte Observer, Feb. 23, 2011 (attached).
² *Highlights of the Senate Budget*, Charlotte Observer, May 25, 2011 (attached).
³ Jim Morrill and Bruce Sicheloff, *N.C. Senate targets light rail*, Charlotte Observer May 25, 2011 (attached).

4 by the road, was a particularly vocal in her opposition to the project.⁴ Ultimately, the legislature settled on a budget which eliminated all funding for the project in fiscal year 2011-2012, halved funding to \$17.5 million in fiscal year 2012-2013, and provided no guarantees about funding beyond that date. Accordingly, the Toll Highway project is left without any guaranteed future funding source. This problem was compounded when the Federal Highway Administration declined, for the second time, to provide funding for the project under the Transportation Infrastructure Finance and Innovation Act ("TIFIA").

5 Further, this project is being pursued at a time when NCDOT is carefully reevaluating how best to spend scarce transportation resources. Transportation needs in North Carolina are fast outpacing available revenue and preparations for the 2040 Statewide Plan are currently focused on how best to confront this shortfall by better prioritizing transportation spending. As tolls will fund only a fraction of the costs for the Gaston East-West Connector, a substantial amount of taxpayer dollars will need to be expended if the project is constructed. This money could be better spent on a project with a documented transportation need. In particular, as it relates to the EIS process, the Turnpike Authority's narrow focus on pre-determined toll road projects has resulted in a failure to examine alternatives to relieve congestion on I-85, maximize economic development opportunities in the area and achieve other important purposes for major infrastructure investments. Given the continued public opposition, the lack of support for the project in the legislature, and the uncertainty about future funding sources, we request that the Transportation Agencies take a careful look at the advisability of continuing to expend resources to pursue this project before issuance of the ROD.

Environmental Destruction

8 Construction of the Gaston East-West Connector will result in significant environmental destruction. The project as proposed would impact 2,237 linear feet of stream per mile of highway, more than double the average of a typical Piedmont highway project. The high level of impacts expected to result from construction of the Toll Highway has prompted the Environmental Protection Agency and other resource agencies to issue comments that raise substantial concerns about the likelihood of the Transportation Agencies securing required environmental permits.

9 In August of this year additional concerns about environmental impacts emerged from the Lake Wylie Marine Commission, which has dubbed the road "a fence across the river," noting the impact on wildlife recreation and scenery.⁵ The design of the bridges that will be necessary for the toll highway to cross the lake have yet to be presented in final form, but nevertheless have drawn substantial criticism from Lake Wylie Marine Commissioners.⁶ It is essential that all such environmental concerns be fully disclosed before any decision is finalized about the project, including the design and location of bridges and other structures. The EIS should be supplemented to address these concerns before a ROD is published.

⁴ Barry Smith, *Garden Parkway, Mid-Currituck Bridge funding would be clipped in Senate budget*, M2M Politics, May 24, 2011 (attached).
⁵ John Marks, *Lake Wylie Marine Commission won't support N.C. toll road without bridge change*, Lake Wylie Pilot, Aug. 1, 2011 (attached).
⁶ *Id.*

Integrity of the FEIS

10 In our February 2011 comments, we raised concerns about the integrity of the Quantitative
11 Indirect and Cumulative Effects analysis prepared for the FEIS. As we outlined, the published study
indicated a total job shift of 900 jobs to South Carolina from North Carolina in the study area from the
construction of the Toll Highway. While any net job loss is significant, the FEIS suggested a shift of
less than 1% of total jobs, and a net loss of only 300 jobs overall from construction of the project. An
e-mail exchange between the authors of the study, however, suggests that the original numbers may
have been much higher, with up to 10-15% total job losses in the study area. The exchange also implies
that the data behind the study may have been manipulated due to political concerns.⁷

12 Concerns about the reliability of the FEIS were echoed in the press, which brought the above
referenced e-mail exchange to the attention of the general public.⁸ In response to this concern Turnpike
Authority Official Steve DeWitt stated that the impacts study produced for the FEIS could only be used
as "a general broad brush." Mr. DeWitt characterized the 10-15% loss of jobs originally predicted by
the study as "raw data", but failed to explain how such "raw data" resulted in the 1% loss of jobs
ultimately published in the FEIS. We urge the Transportation Agencies to address the integrity of this
13 study prior to the publication of a Record of Decision ("ROD"), either by commissioning a new study,
or by fully explaining the methodology behind the original study, and providing a full and forthright
explanation in a Supplemental EIS prior to the issuance of a ROD.

14 Additional concerns about the reliability of the Indirect and Cumulative Effects analysis for the
road arose in April, 2011 with the publication of an economic impact study by John Connaughton.⁹ This
study, which was financed by the Gaston County Chamber of Commerce, predicted high levels of
growth and development directly attributable to the Gaston East-West Connector. The study thus
suggested that the FEIS did not account for all the growth and development that will be induced by the
construction of the Toll Highway. On April 26, 2011 the Southern Environmental Law Center asked the
Turnpike Authority to account for the differences between the Connaughton Study and the FEIS.¹⁰
Despite assurances that the Turnpike Authority would review the study and "act accordingly",¹¹ no
reconciliation of the two studies has been forthcoming.

15 Needless to say, it is a public policy issue of major concern to be using millions of dollars in
North Carolina taxpayer and toll-payer funds to construct a toll highway that will result net job losses in
North Carolina. Before proceeding further with this project, we request that these apparent
inconsistencies be reconciled by the transportation agencies to provide a complete and reliable picture of

⁷ E-mail from Jill Gurak to Lawrence Pesesky, Leo Tidd, Jeff Dayton & Christy Shumate, re: Gaston ICE (May 13, 2010) (stating that the author did not believe there would "be much support for a project in NC that appears to benefit SC the most and takes away growth from the I-85 corridor" and asking if "more outside-of-model smoothing of the travel demand model results [should] be done?") (attached).

⁸ Steve Harrison, *State: Gaston toll road would funnel jobs to S.C.*, Charlotte Observer (Feb. 09, 2011); Kevin Siers, Editorial Cartoon- Garden Parkway, Charlotte Observer (Feb. 11, 2011); Kevin Siers, Editorial Cartoon- Turnpike Authority, Charlotte Observer (March 23, 2011); *Money-waster road will induce sprawl*, Charlotte Observer (Feb. 11, 2011); Mary Newsom, *Road planning from the disco era*, Charlotte Observer (Mar. 31, 2011) (all attached).

⁹ John Connaughton, *The Economic Impact of the Garden Parkway* (April 28, 2011).

¹⁰ E-mail from Kym Hunter to Jennifer Harris, re: Garden Parkway Economic Development Study, April 20, 2011, 8:53am; E-mail from Kym Hunter to Jennifer Harris, re: Garden Parkway Economic Development Study, May 02, 2011, 11:50am (attached).

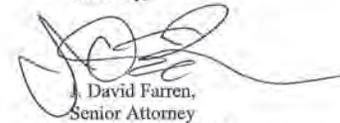
¹¹ E-mail from Jennifer Harris to Kym Hunter, May 2, 2011, 11:54am (attached).

15 indirect and cumulative impacts from the toll highway for consideration by the public and resource
agencies.

16 As illustrated by these further comments, the concerns about the purpose, viability and impacts
of the Gaston East-West Connector continue to mount. We believe that these issues, in addition to the
deficiencies in the FEIS outlined in our earlier comments, cannot be adequately resolved in a ROD. To
include such information only in a ROD would be to undermine one of the very purposes of NEPA,
which is to ensure that the public and agencies are fully involved in the decision making process
surrounding major federal actions. 40 C.F.R. § 1502.1. Therefore, if the Transportation Agencies wish
to continue to pursue this unwise, unpopular and unfunded project, we request that a supplement to the
EIS be prepared to address all concerns expressed to date.

Please do not hesitate to contact me if it would be helpful to discuss our concerns at this point.
Thank you for your consideration.

Sincerely,



David Farren,
Senior Attorney



Kym Hunter,
Associate Attorney

cc: (via e-mail)

- John F. Sullivan III, FHWA North Carolina Division
- David Joyner, NCTA
- Jennifer Harris, NCTA
- Hank Graham, GUAMPO
- Robert Cook, MUMPO
- Senator Kathy Harrington
- Senator Chris Carney
- Representative John A. Torbett
- Representative William A. Current
- Representative Kelly E. Hastings
- County Commissioner Chad Brown
- County Commissioner Tracy Philbeck
- Heinz J. Mueller, US EPA Region 4
- Christopher Militscher, US EPA
- Rebecca Fox, US EPA
- Scott McLendon, US Army Corps of Engineers

Polly Lespinasse, NC Division of Water Quality
Marcella Buncick, USFWS
Rick Gaskins, Catawba Riverkeeper
David Merryman, Catawba Riverkeeper
June Blotnick, Clean Air Carolina

Enclosures

p026

p026

Garden Parkway opponents lobby legislators in Raleigh

Group receives mixed reception in its attempt to stop funding for road.

Recommend 22 recommendations. Sign Up to see what your friends recommend.

By Joe DePriest
jdepriest@charlotteobserver.com
Posted: Wednesday, Feb. 23, 2011

A delegation of Gaston and Mecklenburg residents fighting the proposed Garden Parkway toll road traveled to Raleigh on Wednesday, telling state lawmakers the \$1-billion project is a waste.

Most legislators listened with genuine interest, but group members said Rep. William Current Sr., R-Gaston County, was apparently upset with the lobbying.

"He was belligerent, insulting and hateful," said Warren Ellington, 55, of Belmont. "He wasn't interested in any facts or statistical information. It was absolutely shocking."

Judy Joye, 69, of Belmont described Current's behavior as "arrogant."

"He treated us like we didn't have any sense," she said. "He talked to me like I was a complete numbskull."

Current, a long-time supporter of the toll road, said he'd been in a hurry to get to a meeting and "they bombarded me with all these facts I wasn't interested in hearing."

"If I came across as condescending, I apologize," he said.

The group of about a dozen people, led by Belmont City Council member Bill Toole, held an 11:30 a.m. news conference at the Legislative Building.

A contract to build the controversial Garden Parkway would be awarded later this year. The N.C. Turnpike Authority is waiting on final approval from the Federal Highway Administration before construction begins.

Meanwhile, opponents are focusing on stopping state money and redirecting the dollars already set aside for the road.

On Wednesday, they met with Rep. John Torbett and Sen. Kathy Harrington, both Gaston County Republicans. Harrington was elected to the District 43 seat once held by Democrat David Hoyle, a parkway champion who also owns property along the proposed route. Hoyle has said his holdings had nothing to do with his support of the road.

A long-time opponent of the parkway, Harrington said the meeting with the citizens group went well and "I appreciate them sharing their views."

Along with James Forrester, R-Gaston, Harrington co-chairs the appropriations subcommittee for transportation.

"We're looking at ways to make ends meet," she said. "Nothing is targeted, nothing is exempted. Everything is on the table."

The turnpike authority plans to build and finish the road by 2015. The 22-mile parkway would begin west of Gastonia, at Interstate 85 at Bessemer City. The route drops south for roughly five miles before turning east toward Charlotte. Plans then call for it to cut through south Gaston County and cross the Catawba River where it would end just south of Charlotte/Douglas International Airport at the outerbelt.

Supporters say the road would relieve congestion from I-85. N.C. taxpayers will pay for about half the cost, and tolls would pay the rest.

According to an e-mail obtained by the Observer earlier this month, an economic impact study from the turnpike authority stated the road could cost parts of Gaston and Mecklenburg about 900 jobs by 2035. The impact on congestion would be minimal, with I-85 expected to have slightly more traffic if the parkway goes through.

Toole said the lobbying effort was "very successful" and was the first in a series of trips to the General Assembly at a crucial time.

"This is like the last quarter of the Super Bowl where the underdog is within a touchdown," Toole said. "We've got the ball and just enough time to win. But I wouldn't care to predict who's going to win this game."

Highlights of Senate, House, Perdue budgets

Recommend Sign Up to see what your friends recommend

Posted: Wednesday, May. 25, 2011

GENERAL GOVERNMENT

Domestic violence program:

Senate: cuts domestic violence program 15 percent, or \$730,000

House: meant to cut 5 percent, but was mistakenly not included in budget

Perdue: No cut

Auditor's office:

Senate: Saves half the Performance Audit division, cutting \$772,000

House: Eliminates division, cutting \$1.5 million

Perdue: Tells Auditor's office to cut six unspecified jobs, saving \$784,000

State historic sites:

Senate: Reduces budget 15 percent, or \$1.5 million

House: no reductions

Perdue: no cuts

Museums:

Senate: closes Museum of the Albemarle, saving \$959,000, Museum of the Cape Fear, saving \$520,000

House: cuts \$241,000 for the Cape Fear museum

Perdue: No cuts

HEALTH AND HUMAN SERVICES

Community Care of North Carolina:

Senate: directs it to save \$83 million in Medicaid spending

House: wants \$90 million savings

Perdue: not in budget

Medicare provider rates:

Senate: cuts 3 percent, except for doctors, to save \$71.4 million

House: cut 2 percent for \$46.4 million savings

Perdue: no broad cuts

Medicaid spending:

Senate: eliminates money for home TVs to save \$1.3 million and for spending on over-the-counter drugs to save \$1.9 million

House: not in budget

Perdue: not in budget

Reserves:

Senate: Creates a \$328 million reserve in 2012-13 to fund a state employee performance pay plan. The reserve does not include money for across-the-board raises.

House: No reserve in budget

Perdue: no reserve

TRANSPORTATION

Toll Roads and Bridges:

Senate: Eliminates funding and authorization for the \$660 million Mid-Currituck Bridge to the Currituck Outer Banks and the \$870 million Garden Parkway in Gaston and Mecklenburg counties, both expected to start construction next year.

House: No change for turnpike projects

Perdue: No change for turnpike projects

Ferry Tolls:

Senate: Charge tolls on all four ferries that are free now, including Hatteras-Ocracoke. Raise rates enough to bring in an additional \$2.5 million the first year, \$5 million the second year.

House: Have ferry riders pay more than the 7 percent share of costs now recovered in tolls. Charge tolls on two river ferries that are free now, and raise rates on three tolled ferries enough to bring in an additional \$5 million in toll collections the first year, \$7.5 million the second year.

Perdue: No toll changes

Driver's Education Class:

Senate: Keeps classes free

House: Cut \$8.7 million in state funding, let schools charge students up to \$75 for the class

Perdue: Keeps classes free

Light rail transit and commuter trains:

Senate: No state funding for planned extension of Charlotte's light rail line to the UNC-Charlotte campus, or for Charlotte's proposed North Corridor commuter trains. Cuts \$20.8 million a year.

House: No change

Perdue: No change

Federal rail improvement grants:

Senate: Give legislature power to veto federal railroad grants that would commit the state to more than \$20 million in matching funds or in annual maintenance costs.

House: Veto power would cover grants with state commitment over \$5 million

p026

Perdue: No legislative veto power over federal grants

TAXES

Tax rates:

Senate: Would cut individual tax rates by 1/4 percent for the 2012 and 2013 tax years. Part of a tax cut package estimated at \$671 million.

House budget and Perdue's would not.

Sales tax:

Perdue: Would keep 3/4 of the temporary 1-cent sales tax. Projected revenue: \$826.6 million

House and Senate budgets do not.

Corporate income tax:

Perdue: Cuts the rate from 6.9 percent to 4.9 percent.

House and Senate budgets do not.

Small business:

Senate: Individual income tax deduction of \$50,000 for net business income in tax years 2012 and 2013.

House and governor's budget do not include this.

PUBLIC EDUCATION (K-12)

Teachers:

Senate: Would add funding for 1,124 teachers to reduce student-teacher ratio to 1:17 in grades 1-3 (it would not necessarily mean that classes would be that small, however, unless the state enacts firmer class size restrictions. The current ratio is 1:18 in those grades, though it's not unusual for classes to have 20-25 students).

Perdue and House: Include no line item reduction to teacher positions, but the House budget would require districts to make a discretionary cut of \$42 million that could affect teachers.

Teacher assistants:

Senate: Eliminates \$390 million in funding for teacher assistants in early grades, except in kindergarten classes, which would result in thousands of teacher assistants losing jobs.

House: Eliminates teacher assistants except in kindergarten and first grade.

Perdue: Holds the line on teacher assistants.

ENVIRONMENT-DENR

Senate: \$167.7 million, 132.3 positions cut (tentative count)

House: \$163.4 million, 206.7 positions cut

Perdue: \$179.1 million, 101 positions cut.

p026

N.C. Senate targets light rail

Budget plan that emphasizes repairing, rather than building, roads also cuts Garden Parkway

Recommend 128 recommendations. Sign Up to see what your friends recommend.

By Jim Morrill and Bruce Sicheloff
Staff Writers

Posted: Wednesday, May 25, 2011

More Information

- [Highlights of Senate, House, Perdue budgets](#)

RALEIGH The N.C. Senate would slam the brakes on Charlotte's long-planned northeast light rail extension, eliminating state money that officials say could jeopardize the entire project.

The Senate budget also would ban Charlotte transit officials from obligating state money for the proposed Red Line through northeast Mecklenburg.

And it would kill Gaston County's proposed Garden Parkway toll road, using money from that project for urban loop roads, perhaps including Interstate 485.

The provisions are part of a \$19.4 billion spending plan unveiled Tuesday by Senate Republican. The budget, expected to be approved by the Senate next week, must be reconciled with a House version before going to Democratic Gov. Bev Perdue.

Blocking state money for two toll road and bridge projects as well as Charlotte's rail transit is part of an effort to reserve more money for road maintenance and bridge repair, GOP leaders said.

Fiscal researchers say the Senate plan would provide enough money to replace 36 percent of North Carolina's substandard bridges over the next two years.

"We wanted to target more dollars to maintaining the system we have - as opposed to building new roads, new bridges, new parts of the system," said Senate Leader Phil Berger, a Rockingham County Republican.

The Senate budget would eliminate \$22.5 million from the pot that would be used to extend the Blue Line to UNC Charlotte, according to Dana Fenton, Charlotte's lobbyist. The budget also would bar the Charlotte Area Transit System from entering into any contracts for the Red Line that "require the present or future commitment" of state money.

"It's very disappointing," said Carolyn Flowers, CATS CEO. "It means we have a significant hole in our funding plan and that is a major concern for us. So we hope there is some reconsideration ... and that they consider the impact here in Charlotte and the region."

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Flowers said CATS planned to use the state money as part of a required match when it makes a pitch for federal money this fall. CATS hopes the federal government pays about half the extension's nearly \$1 billion cost. The state would pay a quarter. The other quarter would come from the local 1-cent sales tax earmarked for transit.

"It's terrible," said Sen. Malcolm Graham, a Democrat whose district includes UNCC. "It's one of those things that just doesn't reflect the priorities of the state of North Carolina."

Charlotte City Council member Nancy Carter said the proposed Senate cut could affect efforts to get other federal money. "It affects our capacity to access federal money for all transportation projects, not just transit," she said.

But GOP Sen. Bob Rucho of Matthews said budget writers, faced with a \$2.5 billion shortfall, had to make hard choices. Their choice was to spend on maintaining existing roads and infrastructure.

A new rail line, he said, is "like putting a new roof on a house infested with termites. What good does it do you?"

Blocking money for light rail in Charlotte could set a precedent for Triangle officials who are counting on the state to cover 25 percent of construction costs for planned light rail and commuter train projects that could cost a total of \$3.5 billion over the next 15 years.

"This would hurt Charlotte in the very near term and, if it were to stand, would hurt us in the Triangle, clearly," said David King, general manager of Triangle Transit.

But GOP Sen. Richard Stevens of Cary, co-chairman of the Senate Budget Committee, warned against reading too much into the current budget. He said he would not rule out prospects for Triangle and other rail transit funding in future years.

Light rail and toll roads weren't the only transportation issues in the budget to stir controversy.

Democratic senators blasted a proposal to raise parking fees for Capitol-area visitors to \$2 per hour. And they also questioned budget writers' proposal to charge fees on all N.C. ferries, including those now free.

Sen. Stan White, a Democrat from Nags Head, told the Finance Committee that would mean coastal residents would have to pay for routine trips.

"I find it unconscionable that we could charge people in our state to visit their grandmother (or) their doctor," he said.

Jim Morrill: 704-358-5059

p026

Garden Parkway, Mid-Currituck Bridge funding would be clipped in Senate budget

By Barry Smith

Posted 2011-05-24 14:09
From the Editors
M2Mpolitics.com

RALEIGH – Two toll projects – the Garden Parkway in Gaston and Mecklenburg counties and the Mid-Currituck Bridge along the Outer Banks – would have a critical funding source removed and jeopardize their construction under a Senate budget proposal.

Money known as "gap funding," which would fill the gap between the anticipated revenues from tolls charged and the actual cost of repaying the bonds, would be taken away under the budget proposal.

"That's the Senate proposal," said David Joyner, executive director of the N.C. Turnpike Authority. "There's still a long way to go."

A budget passed by the House earlier this year kept the gap funding for the two toll projects in tact.

Sen. Jim Forrester, R-Gaston, who co-chairs the Senate's budget subcommittee on transportation, said that the Senate's proposal to eliminate the gap funding "might be a bargaining chip with the House."

The final budget bill will be hammered out after the Senate passes its budget, which it's expected to do next week. Members of both chambers, along with representatives of Gov. Bev Perdue, will try to hammer out a compromise budget.

The subcommittee's other co-chair, Sen. Kathy Harrington, R-Gaston, pushed to have the elimination placed in the budget. She made eliminating the funding a part of her campaign last year.

The Senate proposal would eliminate \$15 million a year in funding from the Mid-Currituck Bridge project and \$35 million a year from the Garden Parkway project. The money from the Mid-Currituck Bridge project would be transferred to the general fund and used to purchase replacement school buses for local school systems, with the remaining funds going to the state's transportation "mobility fund."

The money from the Garden Parkway project would go to build urban loops. Harrington said the subcommittee was looking for ways to help put more money into maintenance and to help complete more highway projects.

"Putting money into loops would help finish unfinished projects," Harrington said. She said some of the money put into the urban loops fund could help complete the I-485 loop around Charlotte.

Forrester said that he and Harrington disagreed on the Garden Parkway issue. He said the co-chairs of the full Senate Appropriations Committee made the decision on the toll roads.

Joyner said he wasn't surprised by the move since Harrington had made stopping the Garden Parkway a priority.

"I don't think it's any secret," Joyner said.

Joyner also questioned whether lawmakers wanted to transfer money out of the Highway Trust Fund budget into the general fund to pay for school buses.

"That's a total 180 degrees from where the Legislature was going a couple of years ago," Joyner said. He was referring to efforts to end a longstanding transfer of money from the Highway Trust Fund to the general fund, which pays for general government programs, such as schools, prisons and welfare programs.

"These are state Highway Trust Fund moneys that come from the gas tax," Joyner said. "These are not general fund dollars."

p026

Lake Wylie Marine Commission won't support N.C. toll road without bridge change

John Marks - jmarks@lakewyliepilot.com

LAKE WYLIE -- Months after seeing initial presentations for the planned Garden Parkway in North Carolina, Lake Wylie Marine Commission members still aren't sold on it. They're also not willing to oppose it just yet.

The group heard what Chairman Smith "Smitty" Hanks called "very cursory" information in February on three bridges the Gaston and Mecklenburg county toll road would require over the lake. More meetings followed in March, with more specifics that drew criticism from some commissioners on the structure of the bridges, the number of pilings and their impact on wildlife, recreation and scenery.

Even after expressing concerns, Commissioner Ron Wanless said there's no indication plans have been or will be changed.

"It's a fence across the river," he said. "I find that approach very unsatisfactory for our lake."

Wanless says other options, such as cable-stayed or box-beam structures, could cost up to 5 percent less than what the North Carolina Turnpike Authority currently shows in its plans. Those plans show three bridges, one each over the Catawba River, South Fork River and Catawba Creek along the parkway's 21.9-mile path from I-85 west of Gastonia to I-485 near Charlotte Douglas International Airport in Mecklenburg County. As many as 16 pilings per crossing could be included.

While commissioners haven't warmed to the plans, Hanks said the group may be able to put off an approval or opposition vote since parkway project leaders "don't have any money" currently for construction. But, he said, the commission needs to remain involved.

Throughout the Garden Parkway process, marine commissioners have stated they'll let other state and local agencies take on the task of whether the often contentious road should be built. Their interest, they say, should remain on impacts to the waterways and in particular, bridge crossings. If plan details don't change, Wanless can't see supporting the parkway.

"I believe that we have not gotten a thorough hearing for our concern," he said. "As such, I recommend the marine commission take a stance in opposition to this design."

Commissioners said in the near-term, it would be in their interest to "continue to stay in participation mode" since bridge construction isn't looming.

"We still need to have a meeting," Hanks said.

If the commission can prove an alternate plan would benefit water interests and cost less, Commissioner Howard "Biff" Virkler says it's an argument the turnpike authority would be interested in hearing.

"If it costs less and it's better for the lake," he said, "it makes sense to at least bring it up to them."

All final approvals for the parkway are expected by the third quarter this year. The toll road is expected to cost \$870 million and is scheduled to open to traffic in 2015.

p026

From: Dayton, Jeff <jeff.dayton@ncturnpike.org>
Sent: Thursday, May 13, 2010 1:00 PM
To: Harris, Jennifer <jennifer.harris@ncturnpike.org>
Subject: FW: Gaston ICE
Attach: 100510 Gaston_ICE_PBSJ_NCTA_051210.doc;
QuantitativeMonroeICE_FINAL_4.23.2010.doc

Comments sent back to LBG today.

From: Gurak, Jill S [mailto:JSGurak@pbsj.com]
Sent: Thursday, May 13, 2010 11:41 AM
To: Pesesky, Lawrence; Tidd, Leo
Cc: Dayton, Jeff; Shumate, Christy
Subject: Gaston ICE

Larry and Leo,

Thank you so much for getting this report together so quickly. We all felt that it was a huge improvement over previous versions and represents quite a bit of work. At this point we can actually discuss results and assumptions, where in previous version we weren't quite to that point.

Attached is your ICE Word document, with comments and minor editorial changes included. Below is a summary of the primary comments.

The biggest concern we have is what seems to be quite large decreases in growth/employment in the urbanized areas of Gaston County that are being transferred to the project area and particularly to SC. I don't think there would be much support for a project in NC that appears to benefit SC the most and takes away growth from the I-85 corridor on the order of 10-15 percent. I think the model may be skewing results somewhat since it is on the edge of the overall model. The way the maps are presented may also be somewhat misleading. Should some more outside-of-model smoothing of the travel demand model results be done?

NCTA also had concerns about how the assumption about overall growth not changing is addressed. They are concerned about the agencies buying into the theory that overall growth does not change with or without the project - it just redistributes. This is the same assumption used in the Monroe Connector project, but it was presented somewhat differently. A discussion included in the Monroe report occurs beginning on the bottom of page 17, extending onto page 18 of the attached Monroe report. Please take a look and see what your thoughts are regarding modifying this similar discussion in the Gaston report.

Please let us know if you are available tomorrow morning for a conference call to discuss.

Thanks again - Jill

Here are the comments contained in the attached document so you can see them all together:

Larry and I had talked about the qualitative study somewhat addressing steps 6 and 7 also. I'm not sure if he changed his mind on this.

Figure 1 - Boundary of qualitative ICE a bit hard to read on figure. Also, Quantitative spelled wrong in title block. Cleveland Co not labeled on Figure 1.

Section 2.1.5 - Why can't the employment and population be proportioned out based on area contained in each watershed? Are the results being skewed in these watersheds due to this combination? These watersheds seem to be attracting more development than one would intuitively expect.

State: Gaston toll road would funnel jobs to S.C.

Consultant's e-mail raised questions about political impact that loss of jobs would have.

Recommend 13 recommendations. Sign Up to see what your friends recommend.

By Steve Harrison
sharrison@charlotteobserver.com
Posted: Wednesday, Feb. 09, 2011

More Information

- [Graphic: Garden Parkway Job Gains, Losses](#)

The proposed Garden Parkway toll road could cost parts of Gaston and Mecklenburg counties about 900 jobs by 2035, while South Carolina would add some 600 jobs, according to an economic impact study from the N.C. Turnpike Authority.

N.C. taxpayers are set to pay for about half the highway's \$870 million cost, with the rest paid for by tolls.

The amount of money South Carolina must pay: nothing.

A Turnpike Authority consultant in May worried that the grim projection would make the highway a hard sell politically, according to an e-mail obtained by the Observer.

"I don't think there would be much support for a project in NC that appears to benefit SC the most and takes away growth from the I-85 corridor on the order of 10-15 percent," wrote Jill Gurak of the PHS&J consulting firm, in a message to Turnpike Authority officials.

In the same e-mail, Gurak asked: "Should more outside-of-model smoothing of the travel demand model results be done?"

Belmont City Council member Bill Toole, who is opposed to the parkway, said the e-mail raises questions about the Turnpike Authority's employment study. He said he is worried that the original projections showed more job losses in Gaston and that the numbers were changed for the final study, released in December.

It's the latest twist in one of the state's most controversial highway projects.

Toole said the N.C. Turnpike Authority, which is planning to build and finish the road by 2015, should address what Gurak meant when she wrote about additional "outside-of-model smoothing."

If the 22-mile parkway isn't built, the Turnpike Authority's final projection shows a total of 91,500 jobs would exist by 2035 in the study area, which includes parts of Mecklenburg, Gaston and York counties.

If the parkway is built, there would be 91,200 jobs in the area by 2035 - a decrease of .3 percent.

"Why are they talking about a 10 to 15 percent decrease (in the e-mail)?" Toole said. "What happened to that number?"

Gurak, the e-mail's author, didn't return messages from the Observer. The Louis Berger Group, who conducted the study, referred questions to the Turnpike Authority on Tuesday.

Employment projections

Steve DeWitt, the Turnpike Authority's chief engineer, acknowledged the authority's federally required projection shows job losses. But he said the projections are 25 years into the future, and that the employment numbers shouldn't be isolated.

"It can't be used for (just looking at the employment numbers)," DeWitt said. "It can be used in a general broad brush, in that, 'These are some impacts that can be expected if certain things happen.'"

DeWitt said the authority didn't revise its employment projections to make them more favorable to the project.

"Our responsibility is, as a transportation agency, to do the right thing from an engineering standpoint," he said. "No one would change the result."

He said Gurak's e-mail was her attempting to better understand the modeling process.

"The issue with Jill is, she was trying to learn what the process was. When she saw the numbers, she's thinking to herself, 'This doesn't make sense to me.' She was trying to learn what was going on."

DeWitt said the reference to 10-15 percent job losses was "raw data."

"She didn't know what she was looking at," Dewitt said.

Toole, the Belmont council member, said the e-mail shows the Turnpike Authority was worried about the need for the highway.

"They knew there would be no political support for this," Toole said.

A contract to build the Garden Parkway could be awarded later this year. The authority is waiting on final approval from the Federal Highway Administration before construction begins.

Opponents and supporters

The Garden Parkway would begin west of Gastonia, at Interstate 85 at Bessemer City. The route drops south for roughly five miles before turning east toward Charlotte.

Plans then call for it to cut through south Gaston County and cross the Catawba River, where it would end just south of Charlotte/Douglas International Airport at the outerbelt.

The project has been touted, at times, as a way to relieve congestion from I-85. But the Turnpike Authority's own traffic projections show there would be slightly more cars on I-85 if the Garden Parkway were built compared to the number if it were never constructed.

Some transportation experts, such as David Hartgen, professor emeritus at UNC Charlotte, have criticized the parkway as a waste of money.

As the highway has come closer to becoming a reality, opposition in Gaston County has increased, with many residents protesting the project. They are concerned about the environmental impact of the parkway as well as the possibility it will lead to more sprawling development.

But the project, which has the backing of a number of Gaston politicians and business leaders, also has been touted as a way to strengthen economic ties to Charlotte. The highway, they say, would open large areas of south Gaston for development.

One of the parkway's biggest champions, former N.C. Sen. David Hoyle, a Gaston Democrat, was instrumental in securing state funding for the highway. In 2006, Hoyle and two family members bought 327 acres near a planned Parkway exit at Union New Hope Road and N.C. 274.

The group, called 4-Star Investors, planned to build high-end homes and a retail center on the site. The 4-Star group still owns the land, which hasn't been developed.

In 2008, Hoyle said his investment was unrelated to the highway.

The employment and housing projections confirm that the area around Hoyle's land would see more jobs if the highway were built than if it weren't built.

Former N.C. Sen. Robert Pittenger, a Republican, owns 2,000 acres along the parkway route, including land along U.S. 321 and in Belmont, along the South Fork of the Catawba River. Those two areas are projected to grow because of the parkway, according to the authority study.

Pittenger said his time in the General Assembly gave him no special insight into the parkway. He recused himself from some votes involving the project while he was in the legislature.

Job winners and losers

In terms of jobs, the projection shows winners and losers.

Southeast Gaston County would see a boost of roughly 950 new jobs by 2035 if the parkway were built compared with a "no-build" scenario. An area around U.S. 321 in Gaston would also see new jobs.

p026

Another winner would be in northern York County, in South Carolina, where 649 new jobs would be added. Much of western York County is difficult to reach from Charlotte today, but the parkway would cut travel times significantly.

The reason is that those areas - isolated today from Charlotte - would have a much faster connection to the Queen City because of the parkway.

But the toll road would do little for the rest of Gaston County, according to the study.

Areas around Bessemer City would lose 739 jobs as a result of the parkway. Downtown Gastonia would lose some jobs. In the study, Mecklenburg is also a job loser: The study area of west Mecklenburg and northwest Charlotte shows a loss of 658 jobs.

Some of the job losses would be in northwest Charlotte, along I-85, in one of the poorest areas of the city.

It's possible that job losses in Gaston could be worse than the study projects. The study didn't include some areas of I-85, including an area just north of downtown Gastonia as well as a stretch of the highway through Belmont.

"Given the way the Turnpike Authority shows employment shifting out of the I-85 corridor, it stands to reason that jobs will also be shifting out of nearby Dallas and North Belmont as well, but the Turnpike Authority chose not to look at those areas," Toole said.

p026

Garden Parkway

Recommend 4 recommendations. Sign Up to see what your friends recommend.

Posted: Friday, Feb. 11, 2011



Published: February 11, 2011

Turnpike Authority

Recommend 9 recommendations. Sign Up to see what your friends recommend.

Posted: Wednesday, Mar. 23, 2011



Money-waster road will induce sprawl

Gaston toll road won't create jobs or ease I-85 traffic. Kill it.

Recommend 17 recommendations. Sign Up to see what your friends recommend.

Posted: Thursday, Feb. 10, 2011

The state plans to spend \$870 million to slash a new road through still mostly rural south Gaston County. It's a waste of precious transportation money. Here's why:

The Garden Parkway will not, the state's projections show, relieve congestion on Interstate 85. Projections show more congestion on I-85 if the road is built.

It won't create new jobs in the area. In fact, state projections show a slight decrease in the total number of new jobs for areas of Gaston, Mecklenburg and York counties that were studied, compared with a scenario where the road is not built. And the geographic spread of those projected new jobs shows N.C. counties losing 900 jobs and South Carolina gaining 600, compared to a no-build scenario.

Even those job projections are suspect. Project manager Jill Gurak of PBS&J, a consulting firm on the project, in May sent an e-mail questioning whether the job loss data would look bad. She suggested "more outside-the-model smoothing" of the data. (The Turnpike Authority says Gurak didn't understand computer modeling.)

The Garden Parkway is to be a toll road with tolls helping repay the state's debt for building it. But because toll revenue isn't expected to be enough to repay all the debt, the state has set aside \$35 million a year for an estimated 30 years - more than \$1 billion - to cover the gap.

Think about it. Potholes scar state-maintained streets in Charlotte and other cities; I-85 needs widening in Cabarrus and Gaston counties; a shovel-ready \$365 million commuter rail line languishes in Mecklenburg for lack of money. Why spend millions on this useless road?

We are not sure. But we do know this: Two affluent former legislators own developable property at several planned interchanges. One is former Sen. David Hoyle, an influential Gaston County Democrat, now N.C. revenue secretary. He was instrumental in winning state money for the road. In 2006 he and family members bought 327 acres, which await development, near a planned exit. Another is former Sen. Robert Pittenger, a developer and a Mecklenburg Republican. He owns about 2,000 acres along the toll road route.

The state's projections state clearly that the road won't create more growth in the growing Charlotte region. It will, though, lure more of the growth to southern Gaston. In other words, existing municipalities - where taxpayers have already paid for fire stations, police stations, schools and water-sewer systems - stand to lose potential new growth, which will instead splatter across undeveloped land near the toll road. The new development will require new, taxpayer-funded infrastructure. So explain again why it's a good thing to suck growth and jobs away from established town centers?

Steve DeWitt, chief engineer for the state's Turnpike Authority, defends the road. He says it will reduce congestion and improve mobility. This is transportation theory that's about as up-to-date as a Nehru jacket. Modern traffic engineers understand the concept of "induced traffic" - new roads tend to cause more traffic than if they were never built.

The Garden Parkway is, to all appearances, a boondoggle. Thousands of Gaston residents oppose it. It will destroy existing homes and rural areas, create air pollution and costly sprawl. All it appears good for is enriching developers and politicians. The state should find better uses for its millions.

Road planning from the disco era

Recommend | 4 recommendations. Sign Up to see what your friends recommend.

Posted: Thursday, Mar. 31, 2011

[COLUMNISTS »](#)

Mary Newsom



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[Blog: The Naked City](#)

Don't misunderstand. I loathe driving U.S. 74 through Union County, and I would happily pay money to avoid it. But that doesn't mean I think all is dandy with plans for the Monroe Connector/Bypass toll road. Just the opposite. It's a powerful illustration of much that's wrong with North Carolina's transportation plans.

That \$800 million bypass is a project of the N.C. Turnpike Authority, an agency the legislature created specifically to build a group of road and bridge projects. So don't look to the authority to raise questions about the wisdom of any of those projects.

If you believe in using public money smartly - regardless of whether you prefer pavement to transit, or vice versa - you should want questions asked about any multimillion-dollar transportation project: Will it help solve problems, make them worse or just shift them elsewhere? Does it cause unwanted sprawl or air pollution? Will it do too much environmental damage for too little benefit?

But the turnpike authority roads were ordered into existence before those questions were analyzed. Now the analyses, required by federal law, are the job of the turnpike authority, the agency charged with getting the projects built. How smart is it for them to question the need for those roads?

Whose job is it, anyway, to look at the big picture of transportation in the Charlotte region, to balance whether a Monroe Bypass is the best use of \$800 million? After all, long stretches of I-85 and I-77 are completely inadequate for the traffic they carry. A shovel-ready, \$365 million commuter rail line from Charlotte to north Mecklenburg languishes for lack of funds.

Answer: Despite multiple regional transportation planning groups not one is charged with analyzing projects for the entire metro region.

Hence we get dubious projects like Gaston County's Garden Parkway, another toll road ordered up years before any federal impact analysis was done. It's to be an \$870 million toll road through mostly rural southern Gaston County. It appears to be aimed mostly at enriching land developers.

Among those owning acreage along its route is former N.C. Sen. David Hoyle, now N.C. revenue secretary, who was instrumental in winning state money for the road. Another is former state Sen. Robert Pittenger, whose business is land speculation and development.

In addition to the \$870 million, the state is setting aside \$35 million a year for 30 years - more than \$1 billion - because it now looks unlikely that the toll revenue can repay debt the state will incur to build it.

And now key questions have been raised about whether the impact analyses the turnpike authority did for the Monroe Bypass are even accurate. A lawsuit from several environmental groups offers convincing evidence that the federally required analysis, which is supposed to compare scenarios for "road built" versus "road not built," actually used "road built" data for its "road not built" scenario - and that the authority knew that and lied about it in federal documents.

Monday afternoon I dropped in on a group of regional elected officials and other civic-leader types discussing "next steps" for regional transportation planning. The impetus is this ridiculous reality: Transportation planning in this region is divided among MUMPO, GUAMPO, CRMPO, GHMPO, RFATS, LNRPO and RRRPO. (I won't bore you with full names. The P and O are for "planning organization.")

As the group discussed vision and leadership, Gaston County commissioner Joe Carpenter started talking about a regional transportation coalition in the late 1980s that pushed for an outer-outerbelt road. He unfurled an old map of this vision, eventually killed - and let us hope for good - by former Gov. Jim Hunt.

I did some research. This planned highway, 35 to 50 miles outside Charlotte, came about not through prudent analysis but because then-Mecklenburg County commissioner Jerry Blackmon sketched it out on a map during a meeting. State transportation planners spent years studying it. Pittenger even bought land along its route. It would have cost an estimated \$2 billion in 1993, or \$3 billion in today's dollars.

In the intervening two decades, thinking about urban transportation has changed. Highways have been shown not to relieve congestion, as hoped, but often to create it. Willy-nilly suburban growth, it now is known, is often a net cost, not a gain, for local government revenues.

Yet the Monroe Bypass and the Garden Parkway, conceived in the 1980s, are required to be built - no matter what any factual analysis might show. The Good Roads State indeed.

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Economic Impact of the Garden Parkway

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Section I: Overview

This report estimates the economic impact of the Garden Parkway Toll Road on the Gaston County, North Carolina economy. The proposed Garden Parkway is a 21.8 mile limited access highway which begins in Mecklenburg County at I-485 near Douglas International Airport, heads west across the Catawba River through southern Gaston County, and turns north to intersect with I-85 west of US 321. The highway is scheduled to have nine interchanges, with eight of those interchanges located in Gaston County. The proposed construction plan is estimated to take four years, beginning in 2012, with the road open to traffic in late 2015. The estimated construction cost is \$870 million, with roughly 85.9 percent of the construction costs occurring within Gaston County.

This study consists of four parts. The first part provides an overview of the Garden Parkway and an outline of the report. The second section of the study focuses on the historical economic impact of similar highways built around the country. The Transportation Project Impact Case Studies (T-PICS) provides a national database of before-and-after case studies assessing the economic development and related impacts of transportation projects. The Economic Development Research Group (EDRG), Cambridge Systematics, Wilbur Smith Associates, Texas Transportation Institute and Susan Moses Associates prepared the database and case studies. This section also provides a detailed analysis of both the academic and professional literature on the subject of highways and economic development.

The third section reviews the economic structure and growth of the Gaston County economy within the Charlotte metropolitan statistical area (MSA). This section looks at snap shots of the MSA economy from 1980, 1990, 2000 and 2010. Over this thirty-year period, comparisons of economic structure, economic growth, population growth, and household growth are made for the MSA, Gaston, Cabarrus, Union, York counties. The comparisons focus on identifying the growth and development patterns of the four counties with respect to the overall MSA growth and provide insights into which counties had success tapping into regional growth and why. The

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analysis in this section provides the framework for projecting economic growth and development into the future as infrastructure attributes among the counties change.

The final section of this report provides an economic forecast for Gaston County focusing on the differences in population, household, and employment based on the building of the Garden Parkway. The forecast present in this section use the findings of the previous sections of the report for the basis for projections. The forecast specifically focuses on the changing industrial structure of the Gaston economy within the larger MSA and the differing economic outcomes of the Build/No-Build Scenarios. It also answers the following questions:

- What have the structural changes in the Gaston economy meant and what role will the county play in the future economic growth of the region?
- What is the impact of removing a significant geographical barrier (the Catawba River) that separates southern Gaston County from the central county of the MSA?
- What impact will the Garden Parkway have by opening up a large area of limited developed land so close to the central county of the MSA resulting in ease of access to Mecklenburg County, the city of Charlotte, and the international airport?

Section 2: Review of the Literature

This section provides a review of the current literature as it relates to the relationship between new highway construction and economic growth. The articles reviewed look at a variety of economic measures from employment growth, income level, population growth, productivity, and property values. This section is divided into three parts. The first looks at scholarly articles, the second reviews professional reports, and the third section provides a quantitative review of a number of highway projects and the estimated economic impacts resulting from the existence of a new highway on the local economy.

Part A: Scholarly article literature review

In a 2000 study appearing in the journal, *Regional Science and Urban Economics*, Amitabh Chandra and Eric Thompson examine the relationship between large infrastructure spending, of

the type implied by interstate highway construction, and the level of economic activity. Their article, "Does Public Infrastructure Affect Economic Activity? Evidence from the Rural Interstate Highway System", uses historical data from the U.S. interstate highway program from 1969 to 1993. It tests whether interstate highway construction had a positive impact on local economic development and focuses on non-metropolitan counties. This restriction allowed them to avoid the problem of causality and analyze if high growth was a result of the highway. Otherwise, an area already experiencing high growth may build a highway which serves only to sustain the growth.

Chandra and Thompson identify 185 non-metropolitan counties which received at least one highway after 1969 that did not have a highway before. They also identify a set of 391 adjacent counties. Their constructed econometric model tests the effects of the highway on local income (they use income because output data was hard to find for all of the counties). Their econometric model includes national, regional, and local factors that influence the level of local economic activity. In addition, their model controls for state-level trends and time.

Their findings are consistent and fall into two general areas. First, they find that construction of a new interstate highway raises economic growth, as measured by total earnings, in counties that the highway directly passes through. These counties also experienced an increase in earnings in the manufacturing, retail trade, services, and TCPU (transportation, communications, and public utilities) industries. Also, manufacturing earnings increased in counties adjacent to highway counties. Second, they establish that adjacent counties experienced a reduction in retail trade and government earnings due to the highway's opening.

In non-metropolitan areas the overall economic activity may not increase as a result of the interstate highway. The positive effects to the counties located along the highway seem offset by declines in economic activity to counties adjacent to the new highway. This is an interesting result and suggests that in nonmetropolitan areas there are clearly winners and losers as a result of new highway construction. The winners are those counties that get the road.

Not only is there an ex-post impact of new highway construction for non-metropolitan counties that receive an interstate highway, but there also appears to be an ex-anti impact. Chandra and Thompson's research finds that there are significant "run-up" effects in local economic activity in the years immediately preceding the opening of a new interstate.

They also acknowledge that while their empirical estimates were for non-metropolitan counties, they may also be instructive regarding the impact of highway infrastructure on metropolitan area economies. Their research indicates that the manufacturing sector might grow in metropolitan areas that receive a new interstate highway. In addition, a metropolitan area also might not see the losses in the retail industry that occur in non-metropolitan regions, in part due to the leakage of retail activity down the highway to nearby metropolitan areas. As a result, they suggest that the potential for new highways located in metropolitan areas will likely lead to a net increase in economic activity. However, metropolitan areas may also experience the same rearrangement of economic activity within the region and among the industries identified in the study.

This research clearly suggests that interstate highways have a positive effect on local economic development and there are measurable differences in economic activity between counties on the interstate and counties adjacent to the interstate.

A 2003 study in the *Journal of Planning Education and Research* titled "The Economic Benefits of Public Investment in Transportation: A Review of Recent Literature," by Saurav Dev Bhatta and Matthew P. Drennan reviews recent empirical articles on the long term benefits of the subject of the article. The central question of all the literature reviewed is whether there are long term economic benefits yielded by public investments in transportation.

The article points out that much of the literature focusing on these impacts has been published in economic and academic journals. As a result, planners who could utilize this information in winning funding have not traditionally had easy access to the information. It further points out that the benefits of these investments should be obvious but are often difficult to measure with the masses of raw data.

The authors explain the short term and long term benefits to investment in transportation infrastructure. Possible short term benefits are the employment, earnings, and spending stimulating the construction industry and their suppliers. The article's main focus is on the long term, however, and organizes the literature into five categories depending on the particular long term benefit studied: output; productivity; production costs; income, property values, employment, and real wages; and rate of return. A sixth benefit is mentioned, reductions in noncommercial travel time and improved quality of life, but is not discussed in the scope of the review due to the difficulty in providing analytical data on the subject.

The article goes on to review the long term benefits under defined headings and points out the literature studied and its findings. Fifteen studies used output as their measurement of the long term benefits. The studies used applied theory of production to measure the output based on measures of input, in this case public infrastructure investment. Twelve of the fifteen studies found a positive and statistically significant effect of investment on output. Productivity studies are measured in real output per unit of labor. Six of the eight studies reviewed found a positive significant relationship between public capital and productivity. All nine of the studies dealing with costs of production demonstrated a negative, statistically significant relationship between public investment and cost of production. In other words, the higher the investment, the lower the cost of production. The article reviewed fourteen studies dealing with income, property values, employment, and real wages. Nine of the studies found a positive, statistically significant benefit. Only two studies provided empirical estimates on rates of return, and they both find the true rates of return are higher than the estimated rates of return.

Of all the studies reviewed in all the categories, only two found a negative relationship between public investment and long term benefits. The few remaining that were not positive could not prove or disprove a positive relationship. The authors also point out that the most useful studies deal in geographic analysis below the state level. They conclude that the vast majority of studies demonstrate different numerical answers but arrive at the same conclusion: there is a positive and statistically significant relationship between public investment in transportation and long term economic benefits.

In a 1999 annotated bibliography for the U.S. Department of Agriculture entitled "Highway Investment and Rural Economic Development," Dennis M. Brown summarizes studies on the rural economic development of highway investment. Most of the articles summarized were written within the last twenty years. While the primary area of study is rural areas, some urban studies are included.

The article begins by noting that it is a commonly held view that highway investment is an effective economic development tool and the Federal Government recognizes this with substantial funding for projects with that stated end. The author goes on to summarize the economic theories used in studying the impacts of highway investment. These include regional development theory, regional growth theory, growth pole theory, location theory, trade theory, and econometric modeling. The difficulties with these theories lies in parceling out whether the development would have occurred without the construction of the highway and looking at the effects in a narrow framework by not taking into account the larger regional growth process.

The articles included in the summary are divided into categories: aggregate economic effects, industrial location decisions, industry studies, spatial effects and studies of temporal effects. The author then cites several studies under each heading and describes the main findings of the individual studies.

Aggregate economic studies deal with those effects on employment, income, output, population, and rates of migration. Most of the articles used regression analysis to explore how highway construction affects regional economies. Industrial location studies focus on how highways affect a business entity's decision to locate within proximity. These articles used surveys to assess this decision. Industry studies focus on how transportation investment affects an industry or sector. The articles are usually divided into manufacturing, retail, wholesale, and services. Studies of spatial effects focus on local impacts. These explore patterns of industrial, commercial, and residential development and their impacts on employment, income, and population. Studies of temporal effects take both short term and long term effects and analyze how highway construction affects the studied time periods.

A discussion of the costs of new investments is included as well. A main concern is that new investment diverts economic activity from an existent road. Also, in situations with low population sizes there may be a burden of highway maintenance costs spread amongst too few residents. The article notes this can be mitigated with good foresight and planning.

In conclusion, the studies summarized find transportation infrastructure is important in generating local economic development. The primary impacts in rural areas are increased employment, particularly in manufacturing and retail, and that new highways specifically benefit rural counties in close proximity to metro areas. This growth results in higher wages for workers and increased net income for local business owners. In rural areas, other benefits include improved access for residents and businesses, reduced transportation costs and travel time, safety and environmental gains, and cost savings due to more competitive pricing.

An article by David A. Aschauer, the senior economist for the Federal Reserve Bank of Chicago, entitled "Highway Capacity and Economic Growth," posits that, "the quality and quantity of highway transportation systems have a direct bearing on economic growth." The author begins the paper by pointing out that shorter commuter trips spurred by the decentralized location of firms along the freeway system have had positive impacts on regional economic growth.

The article works under three empirical implications: 1) infrastructure capital brings a positive marginal product in a "private-sector neoclassical production technology"; 2) infrastructure capital compliments private capital and can enhance the marginal product of private capital; and 3) infrastructure investment likely stimulates private investment in plant and equipment.

The article begins by establishing a conceptual approach for the connection between the level of highway capacity and the growth rate of per capita output. The analysis centers on "the linkages among highway capacity and the production of transportation services, private sector investment, and economic growth." The author then details the economic concepts by explaining the formulas and models used for this approach.

The data analyzed in the article is on sample averages of real per capita income growth and measures of highway capacity and quality (measured as the total road mileage in a state relative to the square mileage of the state) throughout the lower forty-eight states from 1960 to 1985 to determine the long term relationship between the transportation infrastructure and economic growth. The conclusion of the data is that a more extensive and higher quality highway system expands transportation services and "raises the marginal product of private capital." This, in turn, induces investment in physical capital and grows per capita income and output.

"The Economic Impacts of LULUs," a paper published in *Environment and Planning C: Government and Policy* in 2000, written by Terance J. Rephann, examines locally unwanted land uses (LULUs) and their effects on communities. The paper studies five different kinds including large dams, prisons, commercial nuclear power plants, gambling casinos, and of particular importance to the scope of this literature review, interstate highways. The author uses "quasi-experimental control-group methods" to investigate the economic impacts of LULUs on US counties from 1972 to 1994.

The author points out the criticisms leveled at these projects in the form environmental, social, and distributive effects. The paper then goes on to discuss some of the reasons these projects are underappreciated in terms of economic growth and development effects. In terms of highways, the areas which are more urbanized and centrally located experience more growth and the retail trade and service sectors benefit the most from their development.

The methodology used in the paper takes a control group of counties and compares them to a group of counties with a similar makeup that received investment in LULU infrastructure. The goal of the comparisons is to monitor the growth rates of the counties with the perceived undesirable project with those that did not receive any such investment. In addition, the control counties must be at least sixty miles from a county with a LULU facility and must be similar in terms of industrial structure, spatial characteristics, and demographics. The economic impacts were then measured using data from the Regional Economic Information System.

The results of the data comparisons show that counties with highway investment showed an ability to influence the location decisions of firms and residents. The conclusion of the study is that few negative effects come from these LULUs, and interstate highways actually stimulate aggregate employment.

Part B: Professional reports review

A report titled the "DRA (Delta Regional Authority) Delta Development Highway System Plan" explores the considered development of the highway system in a 240 county and parish region in eight states. The report proposes economic opportunities that result from highway investments should be a key factor in the building decision process and provides a cost-benefit analysis and literature review.

A table in the report details that the 3,843 mile highway system's total economic benefit in annual terms is \$3.5 billion in personal income, 130,000 full time job at an average annual salary of \$27,000, and 104,000 temporary construction jobs. The personal income category is divided into increased travel efficiency and increased economic development. The travel efficiency is measured through travel time savings, vehicle operating cost savings, and safety benefits. The economic development is measured through business attraction or expansion and improved connectivity to economic centers. The industries most likely to see increases in long term employment are tourism (hotels/motels), retail and eating, warehousing and distribution, food product manufacturing, professional services, and non-durable manufacturing.

The report goes on to describe the sources of the economic impact which are direct impacts, increased economic efficiency, and business attraction impacts. Direct impacts are those associated with the immediate construction of the highway system. Increased economic efficiency comes from improving freight movements and connectivity while mitigating congestion. This frees up resources and offers more competitive pricing which leads to a region's overall economic competitiveness. Business attraction comes in the forms of firm location/relocation and increased tourism and roadside service industries (gas stations, restaurants, hotels). The report is careful to note that the benefits of infrastructure investments

are not evenly distributed throughout the economy and different industries benefit more than others.

In the literature review section of the report, the text provides a summary of "rules of thumb" from the economic reports on highway construction. These rules are:

- Infrastructure improvements are necessary but not sufficient conditions for economic growth.
- Aggregate multi-county studies have found higher employment and earnings growth rates in counties served by the highways than those not served.
- The benefits industries derive from highway improvements differ across industries.
- Most industries enjoy reduced costs as a result of highway improvements.
- Retail and manufacturing seem to especially benefit from highway improvement.
- Highway construction has shown a tendency to increase property values and development densities for locations in close proximity to highways.
- Industrial returns to infrastructure improvements diminish over time.
- Changes in highway network investment lead to larger changes in productivity growth in vehicle-intensive industries.
- Cost reductions due to an increase in highway capital may lead to a reduction in output price.
- Highway capital and private capital are complements.

In conclusion, the report finds that the construction of the highway system would facilitate economic development. It should be viewed as part of a larger context in the form of a regional economic development plan for the eight-state region.

The Federal Highway Administration, part of the U.S. Department of Transportation authored a report titled "Economic Development History of I-81 Corridor" to overview the history, associated socioeconomic data, and major changes as a result of the construction. I-81 is a north-south interstate that runs from the US-Canada border to I-40 in Tennessee. The report focuses on the 234 mile portion through eight counties in Pennsylvania.

The history section focuses on the construction, the reason for the project development, and a regional profile with sections on the different metropolitan statistical areas (MSAs). Construction began in 1958 and finished in the mid 1970s. In 2001 there was also a widening project undertaken in parts of the highway. The main reason for the project was to provide a north-south route that connects the east-west routes of I-40, I-70, I-80, and I-90. It has since become a major shipping route for agricultural products and an alternative for shipping and travelers wishing to bypass the crowded I-95 corridor around the New York City area.

The section on socioeconomic data focuses on population, employment, personal income, industry mix, property value changes, and residential construction. In aggregate, the populations of the southern counties grew while those in the north shrunk. Between 1969 and 2002 the employment along I-81 increased by 251,461 jobs, and from 1972 to 1992 the employment growth in all but one southern county outpaced the state's annual growth. Personal income in the northern region is lower than the southern region, but both incomes are on the rise. As in the rest of the country, the employment mix of the eight counties has increased in the service sector and decreased in the manufacturing sector. In the 1990s the property value in the southern region increased. The value in the northern region during the early to mid 90s actually decreased due to the restructuring of the economy, but has actually increased from 1998 to 2002 by 60%. There was a statewide decline in construction during the 1990s that was reflected in the counties studied.

The major changes due to the highway's construction are associated with economic development. In the southern region traffic freight has increased due to Harrisburg being a strategic location with links to Baltimore, Philadelphia, New York, and New England. Also, military supply depots have expanded in the area and several new businesses have located around the two intermodal hubs. In the northern region the trucking and warehousing industries grew while the manufacturing industry went through a decline throughout the state. Recreation, amusement, and commercial development has also occurred.

In summary, the report emphasizes that the highway has grown from a regional connector to a major interstate trucking route which has supported economic growth for the regions surrounding the highway. Currently, 36,000 to 79,000 vehicles use I-81 per day with 30% of them trucks.

Another report authored by the Federal Highway Administration, "Economic Development History of Interstate 43 Corridor," looks at the north-south highway located in Wisconsin. The report covers the original section between Milwaukee and Green Bay. It is divided into discussions about the history, socioeconomic data, and major events:

The history section discusses reasons for project development, the details of construction, traffic counts and profiles of the regions located along the highway. In the 1960s the Federal Government approved the interstate, and the eastern route was completed in 1981. When the report was published, the western route was still under construction. Previously, the interstate system only linked the state's two largest cities, Madison and Milwaukee. The route runs through five counties, with four of them considered metropolitan. Based on traffic counts, the Green Bay portion of I-43's use has increased faster than other regions along I-43.

The socioeconomic data section discusses population, employment, personal income, industry mix, business establishments, property value changes, and residential construction. From 1960 to 2000 the data suggests steady population growth in all but Milwaukee County which experienced a gradual decline. The largest concentrations of employment are in Green Bay and Milwaukee. However, employment grew in all of the counties and even in Milwaukee County where the population declined. Average per capita income along the highway corridor is higher than the state average and Ozaukee County is highest in the state. The economic shift in the areas along the highway is the same as the state overall: the service sector grew while the manufacturing sector decreased. In conjunction, the service and construction businesses located along the corridor increased from 1990 to 2000 while agriculture, mining, transportation, and utilities declined. From 1984 to 2002 property values increased. This is a leading indicator of economic growth. Residential construction growth was mixed. The report notes this may be related to the higher prices of housing towards the end of the time period studied.

The major events section focuses on the economic developments located along the I-43 highway. Most of the events have occurred around Green Bay, the city that was linked to the interstate transportation network by the highway. These have been in the form of start-ups, expansions, and relocations. The other counties have also benefited in the form of growing retail, industrial, services, and hospitality industries. Milwaukee County, an already densely populated center, has enjoyed the benefits of increased commuter access for suburban residents to the urban city center.

In conclusion, the report notes I-43 has become a major route of goods and transportation and contributed to the economic development of the counties along the highway, especially in Green Bay. With the exception of Milwaukee County, which was already well connected with highway infrastructure, the other counties have grown rapidly as well.

A 2008 project by Mulatu Wubneh from the Urban and Regional Planning Program, Department of Geography at East Carolina University, titled "US Highway 17 and its Impact on the Economy of Eastern North Carolina," explores the economic impact of an improved highway through trends in demographic and economic growth. It uses these figures to analyze a region which has historically lagged behind the rest of the state by exploring how much of the \$2.4 billion federal and state investment has contributed to economic growth. The study gives an overview of infrastructure and economic development, discusses the short and long term impacts, looks at transportation and socioeconomic characteristics of Eastern North Carolina, and provides economic impact models and estimates:

The project begins by providing the different perspectives on the links of investment in infrastructure and economic development. While it is well recognized that infrastructure plays a critical role in economic development, it is difficult to quantify. The author cites several studies that link positive development to highway investment and mentions two that show no relationship. Those that show no relationship argue that other factors could contribute to economic growth. Therefore, the project focuses on identifying the actual measurable benefits that accrue as opposed to attempting to guess relationships and determine causality.

The study divides the benefits into short term and long term. The quantifiable short term benefits are demonstrated in output, earnings and employment. Total output is estimated over \$5.5 billion, total earnings over \$1 billion and total jobs over 20,000. The long term benefits include increased safety, reduced travel time, dollar savings for businesses due to reduced transportation costs, and enhanced regional capacity. The last benefit can be explained by new business attraction, retaining existing businesses, enhancing property values, additional tax revenues, and improving employment capacity. Long term benefits are more difficult to quantify than short term ones.

In terms of socioeconomic data, the study defines the region as the 41 counties serviced by the Office of Economic Development (OED) of East Carolina University. Many of these counties lag behind the state average in population growth, per capita income, total earnings, unemployment, and percentage of adults with no high school or college education. In addition, the counties that Highway 17 runs through have the lowest average road density of the region and overall state. In a comparative analysis the aforementioned counties did better than the whole of eastern North Carolina in several social and economic characteristics.

The modeling section explains the terms outlined in the benefits section and the input-output models used to measure those benefits. Direct impact is the spending on the highway construction directly introduced into the local economy. The indirect impact consists of the effects from the direct spending based on an input-output model that represents "inter-industry linkages." The induced impact represents the expenditures of households as employees spend their wages and salaries. The total impact is the sum of all three impacts. The author uses the Regional Input Output Modeling System II (RIMS) to estimate the impacts.

The project concludes that the highway will provide a transportation infrastructure that will advance the local economy by improving the investment climate of the region. Its presence will attract new businesses due to reduced transportation costs, support existing ones, and increase local output and employment. In addition, investment in infrastructure has a multiplier effect that continues to grow over time and will provide benefits to the region in the long term.

A 2010 report by the Center for Business and Economic Research at the University of Alabama and commissioned by the Coalition for Regional Transportation explores the impact of the 21-year construction of the 52.5-mile Northern Beltline (NB), or I-422 in Jefferson County, Alabama. The authors of the report are Samuel Addy, Ph.D., Ahmad Ijaz, Carolyn Trent, Kathleen Gabler, and Jonathon Law. The report provides an existing conditions review, population projections and economic forecasts, impacts, and concludes with a section on environmental justice.

The report begins by describing Jefferson County and the Northern Beltline corridor. During the last 20 years the county's population grew at a slower rate than the rest of the state with most of the growth occurring in suburban metro areas. Due to these demographics, average commuting time has increased. As of April 2010, the county unemployment rate was 10.2%.

Next, the report provides population projections and economic forecasts in five-year increments through 2040 derived from baseline growth in business activity and population change. The population projections use census data from the previous decade, and the authors predict the NB Corridor will grow faster than the rest of the county with increased job prospects from the new highway boosting that growth. The study provides economic data for the county, metro area, and state since the corridor is too small an area to allow for accurate forecasting. Total employment is projected to grow by 43% in the state, 16% in the metro area, and 22% in the county.

The section on impacts presents the potential impact of the NB on the economy, population, business growth, and communities. The construction phase is a one-time only benefit and depends on the length of time the project takes while the post-completion effects are continuous and those are presented on an annual basis. The authors divide their impact estimates into household or economy-wide impacts. A construction cost estimate of \$3 billion was used in conjunction with multipliers from the RIMS II to determine economic impacts.

The study concludes that nearly 70,000 construction jobs will be generated during the construction phase, and 20,000 new jobs created annually due to the economic growth attributed to the completion of the beltline. In addition, the economic impact will result in \$155 million in

additional tax revenue for the state, county, and local governments during the construction phase, with \$54 million of additional annual tax revenue for local governments after the completion of the project.

Part C: T-PICS

The following section highlights seven highway transportation projects, and the pre and post data regarding their economic impacts on the local counties. The projects included are the Verona Bypass, the Wichita Northeast Bypass, the final leg of the Henderson I-515, the Georgetown Bypass, US Highway 281 in San Antonio, US 460, and the I-785 Bypass in Danville, Virginia.

Transportation Project Impact Case Studies (T-PICS) provides a national database of before-and-after case studies assessing the economic development and related impacts of transportation projects. It allows users to search for relevant case studies that fit specific criteria and to review a wide range of impacts for specified types of projects. The database includes narratives and pre and post-construction data describing economic, community development, and land use characteristics of the cases, and provides a searchable and downloadable data base that can be used by both planners and policy-makers.

The system was designed and developed by Economic Development Research Group (EDRG) and ICF Consulting. Case studies were prepared by EDRG, Cambridge Systematics, Wilbur Smith Associates, Texas Transportation Institute, and Susan Moses Associates.

The Verona Bypass in Wisconsin is a 2.7-mile four-lane semi-circular beltway around Verona, a growing suburb of Madison, which began construction in 1990 and ended in 1995. Both federal and state sources funded the project. The bypass was part of a series along Highway 18/151 in the 1980s and 1990s to provide four-lane highway access between Madison and the Iowa border. The project cost \$30 million and resulted in more even growth to the south of Verona. In addition, there was a 60% reduction in traffic through the downtown area with only the loss of a few fast food and gas stations that served the commuter traffic. The city annexed 88 acres served by the bypass to the south and zoned it for commercial and industrial development. In that space

developers built 1.8 million square feet of retail, industrial, and office space with an additional 4,000 new jobs.

The Wichita Northeast Bypass in Kansas, a 10.5-mile four-lane bypass that runs northeast of the city through a suburban quadrant, began development in 1989 and completed construction in 1993. The state, county, and city all contributed to both the design and funding of the bypass. The purpose of the construction was to add capacity and improve mobility to an already congested area whose residents suffered lengthy commuter times. The project cost \$103 million and resulted in a business park, upscale office space, retail, and residential complexes. This development contributed an estimated 24,000 new jobs to the region since its completion with \$1.2 billion in additional annual income. It also decreased commute times from the suburbs to the downtown area.

I-515 in Henderson, Nevada is a 20-mile spur of Interstate 15 in the Las Vegas Valley of Nevada that began construction in 1982 and finished in 1994. The data regarding this project refers to the last leg of the highway, an almost six-mile section from I-215 to the South Boulder Highway in Henderson, NV. This portion, which cost \$140 million, began construction in 1990 and ended in 1994. The overall goal of the project was to replace the Boulder Highway as the main southeastern access to Las Vegas. The project resulted in an estimated 850 jobs directly related to the highway due to commercial development around the new interchanges. Planners and realtors noted that residential development was not the result of the highway, however, since the city experienced massive growth in 27 planned communities, only one of which was in the studied corridor. The study concluded that it was difficult to distinguish the specific impact even though the adjacent zip code experienced less than half the employment growth of Henderson.

The Georgetown Bypass is a 5.5-mile four-lane alternative route to US 460 that runs south of Georgetown, KY. Construction began in 1991 and work completed in 1994 at a cost of about \$24 million. Prior to construction, Toyota opened a manufacturing plant in the mid-1980s transforming Georgetown from a small town and doubling its population. The bypass served to reduce commuting bottlenecks to nearby Frankfort and Lexington from Georgetown, improve access to parts of the town, and accommodate future planned retail development. The project

opened up land for residential, retail, and industrial development to support the Toyota plant, however the study concluded the bypass was not responsible for any net job creation. The study does recognize it as a contributing factor in the county's overall growth since its construction.

The portion of US Highway 281 in San Antonio called the McAllister Freeway is an eight-mile portion constructed between 1969 and 1978. It cost approximately \$40 million and used state funding since opponents challenged the use of federal funds due to conservation issues. The freeway serves as a connector between downtown and the wealthy northern edges of the city, including the airport that existed before the highway. The primary economic impact of the construction supported the tourism trade of downtown San Antonio by providing easy airport access and aided in the expansion of residential growth into farmland north of the city. In addition, estimates show the highway is responsible for over 10,000 jobs in the region with extensive development in retail, mixed-use development, office, and luxury condominiums.

US-460 is a bypass that serves as a connector between I-81 and Blacksburg, Virginia. Construction began in 1998 and ended in 2002, costing \$187 million. The state transportation board approved the project to mitigate congestion and environmental degradation by providing a direct link from Blacksburg to Roanoke, a major freight thoroughfare. The construction helped spur growth in high tech businesses at a corporate park located on the bypass and provided additional traffic capacity for expansion of the football stadium at Virginia Tech University. The project contributed an estimated 748 jobs in the area and significantly cut down on congestion.

The Danville Expressway is a 15 mile-long four-lane highway constructed between 1987 and 2004 to bypass US 29. The project, costing \$203 million, is part of a larger effort to connect Greensboro, North Carolina and Danville, Virginia to assist in the economic diversification and development of the region. Construction of the bypass served to ease job losses in tobacco and textiles by attracting industries that rely on interstate access to markets on the east coast. Such industries include food processing, building materials manufacturing, high technology vehicle manufacturing, plastics, furniture manufacturing, and precision parts manufacturing. The Expressway is responsible for over 2,100 jobs and \$62 million in corporate and institutional investment. While the net increase in jobs is small, local officials maintain without the highway

the area would have faced significant job losses as evidenced in nearby Henry County where employment decreased 26% from 1987 to 2006.

Tables 2.1, 2.2, and 2.3 provide T-PICS data on the seven projects detailed above with an average of the relevant statistics for the affected counties. All seven of the areas demonstrated per capita personal income growth and growth in the number of jobs. The average income growth was 29% and the average job growth was 62%. With the exception of Danville, the population and population density of all the areas saw an increase (probably due to the job losses in Danville's shuttered industries prior to the highway construction). Average population grew by almost 39%.

Table 2.1 shows the economic impacts of the seven projects as well as the average impacts. All of the projects positively influenced the studied areas in terms of both direct and indirect jobs, income, and output. The average direct job creation was just under 4,000, and the average indirect job creation was just over 2,000.

In conclusion, the seven highway construction projects proved to have positive impacts on the local and county economies, providing both employment and income growth. The construction of a major highway project even proved to mitigate the otherwise negative effects of job losses in the Danville area.

Table 2.1
Overview of Selected T-PICS Highways

Highway	Construction Start Date	Construction End Date	Actual Cost	Actual Cost 2008	Length In Miles
Verona Bypass	1990	1995	\$30,000,000	\$42,382,480	2.7
Wichita Northeast Bypass	1989	1993	\$103,200,000	\$163,137,074	10.5
I-515 Henderson	1990	1994	\$140,550,248	\$160,195,288	5.9
Georgetown Bypass	1991	1994	\$24,440,000	\$36,415,261	5.5
US Highway 281, San Antonio	1970	1978	\$40,400,000	\$176,434,912	8.0
US 460	1998	2002	\$187,000,000	\$233,807,555	10.0
Danville, Virginia, I-785 Bypass	1987	2004	\$203,000,000	\$278,562,836	25.0
Average			\$104,084,321	\$155,847,915	9.7

Table 2.2
Income and Employment Impacts of Selected T-PICS Highways

	Pre Personal Income Per Capita	Post Personal Income Per Capita	Percent Change	Pre Number of Jobs	Post Number of Jobs	Percent Change
Verona Bypass	\$34,534	\$41,904	21.34%	272,694	344,798	26.44%
Wichita Northeast Bypass	\$32,624	\$41,440	27.02%	258,783	321,289	24.15%
I-515 Henderson	\$32,715	\$40,883	24.97%	478,884	1,141,180	138.30%
Georgetown Bypass	\$28,714	\$35,309	22.97%	14,855	27,697	86.45%
US Highway 281, San Antonio	\$18,544	\$35,426	91.04%	383,019	951,890	148.52%
US 460	\$22,890	\$23,321	1.88%	52,096	56,689	8.82%
Danville, Virginia, I-785 Bypass	\$24,187	\$27,775	14.83%	51,655	53,550	3.67%
Average	\$27,744	\$35,151	29.15%	215,998	413,870	62.34%

Table 2.3
Population and Economic Distress Impacts of Selected T-PICS Highways

	Pre- Population	Post Population	Percent Change	Pre Economic Distress	Post Economic Distress	Percent Change
Verona Bypass	368,444	428,642	16.34%	0.35	0.57	62.86%
Wichita Northeast Bypass	394,706	469,321	18.90%		0.97	
I-515 Henderson	857,357	1,777,170	107.28%	0.76	0.91	19.74%
Georgetown Bypass	23,943	32,048	33.85%	0.80	0.47	-41.25%
US Highway 281, San Antonio	821,568	1,555,190	89.30%		1.02	
US 460	97,764	105,155	7.56%	0.42	0.70	66.67%
Danville, Virginia, I-785 Bypass	107,658	106,256	-1.30%	1.09	1.86	70.64%
Average	381,634	639,112	38.85%	0.68	0.93	35.73%

Tables 2.4 and 2.5 present the construction impacts of the seven T-PICS highways. On average, during the construction phase of the highway each region gained 3,993 direct jobs and a total employment impact of 6,032 jobs. In addition, the average output impact during the construction period was over \$1 billion, while the average income impact of the seven projects was almost \$300 million.

Table 2.4
Employment Construction Impacts of the Selected T-PICS Highways

	Verona Bypass	Wichita Northeast Bypass	I-515 Henderson	Georgetown Bypass	US Highway 281, San Antonio	US 460	Danville, Virginia, I-785 Bypass	Average
Direct Jobs	300	17,126	850	1,376	5,453	748	2,100	3,993
Indirect Jobs	212	6,851	816	124	4,547	542	1,176	2,038
Total Jobs	512	23,977	1,666	1,500	10,000	1,290	3,276	6,032

Table 2.5
Output and Employment of the Selected T-PICS Highways

	Verona Bypass	Wichita Northeast Bypass	I-515 Henderson	Georgetown Bypass	US Highway 281, San Antonio	US 460	Danville, Virginia, I- 785 Bypass	Average
Direct Output	\$35,861,301	\$3,105,840,088	\$113,044,998	\$601,008,972	\$724,286,987	\$74,826,797	\$213,690,994	\$695,508,591
Indirect Output	\$25,341,999	\$1,242,439,941	\$108,523,003	\$54,160,702	\$603,948,975	\$54,221,699	\$119,667,000	\$315,471,903
Total Output	\$61,203,300	\$4,348,280,029	\$221,568,001	\$655,169,674	\$1,328,235,962	\$129,048,496	\$333,357,994	\$1,010,980,494
Direct Income	\$14,284,400	\$863,895,020	\$42,235,001	\$78,841,698	\$277,019,012	\$30,862,499	\$75,970,596	\$197,586,889
Indirect Income	\$10,094,300	\$345,588,013	\$40,545,601	\$7,104,900	\$230,992,996	\$22,363,800	\$42,543,499	\$99,890,444
Total Income	\$24,378,700	\$1,209,483,032	\$82,780,602	\$85,946,598	\$508,012,009	\$53,226,299	\$118,514,095	\$297,477,334

Section 3: Economic Structure and Growth of the Gaston County: 1980-2010

Gaston County is one of six counties that make up the Charlotte Metropolitan Statistical Area (MSA). The Charlotte MSA is the 33rd largest in the United States, with a 2010 population of 1,758,038, and was the seventh fastest growing among the 100 largest MSAs between 2000 and 2010 growing by 2.1 percent. Over the past five decades, this pattern of robust population and economic growth has been a constant for the Charlotte MSA. However, while the overall growth of the MSA during the last half century has been spectacular, not all of the counties within the MSA have experienced the same level of economic growth.

Mecklenburg County is the largest and fastest growing county within the MSA. In 1980 Mecklenburg had a population of 404,270 and accounted for 47.3 percent of the total MSA population. Gaston County was the second largest county with 19.0 percent of the population. By 2010 Mecklenburg's population increased to 919,628 and the MSA's largest county had 52.3 percent of the population. Meanwhile, Gaston County's population decreased from 19.0 to 11.7

percent of the MSA ranking third behind York County, South Carolina in a tie with Union County. Tables 3.1 and 3.2 present the population levels and percent of total MSA over the past 30 years.

Table 3.1

County Population: 1980 to 2010					
County	1980	1990	2000	2008*	2010
Cabarrus	85,895	98,935	131,063	170,395	178,011
Gaston	162,568	175,093	190,365	205,101	206,086
Anson	25,649	23,474	25,275	25,345	26,948
Mecklenburg	404,270	511,433	695,454	878,961	919,628
Union	70,380	84,211	123,677	191,514	201,292
York	106,720	131,497	164,614	220,219	226,073
MSA Total	855,482	1,024,643	1,330,448	1,691,535	1,758,038

* Office of State Budget and management Population Estimates and Projections

In 2000 Mecklenburg County reached its peak percent of total population and has been constant over the past decade. Mecklenburg's share of total MSA population will likely decline as the overflow population growth spills over to the adjacent counties in the MSA. This pattern of population spillover is consistent with older MSAs that reached these population levels decades ago. Both Union and York Counties are already experiencing that spillover. Table 3.3 presents the population growth rates for the counties within the Charlotte MSA over the past four decades.

Table 3.2

County Population Percent of Total: 1980 to 2010					
County	1980	1990	2000	2008*	2010
Cabarrus	10.04%	9.66%	9.85%	10.07%	10.13%
Gaston	19.00%	17.09%	14.31%	12.13%	11.72%
Anson	3.00%	2.29%	1.90%	1.50%	1.53%
Mecklenburg	47.26%	49.91%	52.27%	51.96%	52.31%
Union	8.23%	8.22%	9.30%	11.32%	11.45%
York	12.47%	12.83%	12.37%	13.02%	12.86%
MSA Total	100.00%	100.00%	100.00%	100.00%	100.00%

* Office of State Budget and management Population Estimates and Projections

Between 2000 and 2010 Union County had the largest population growth rate followed by York County and then Cabarrus County. All three exceeded the Mecklenburg County population growth rate during that decade. Over the four decade period, only Union County had a faster population growth rate than Mecklenburg County. The second slowest growing county over the

Table 3.3

County Population Changes					
County	1980-90	1990-00	2000-08	2000-10	1980-2010
Cabarrus	15.18%	32.47%	30.01%	35.82%	107.24%
Gaston	7.70%	8.72%	7.74%	8.26%	26.77%
Anson	-8.48%	7.67%	0.28%	6.62%	5.06%
Mecklenburg	26.51%	35.98%	26.39%	32.23%	127.48%
Union	19.65%	46.87%	54.85%	62.76%	186.01%
York	23.22%	25.18%	33.78%	37.34%	111.84%
MSA Total	19.77%	29.85%	27.14%	32.14%	105.50%

30 year period and for each 10 year interval was Gaston County. Its population increased by only 26.8 percent over the 30 year period compared to the overall MSA grow rate of 105.5 percent. In fact, only Gaston and Anson County's population growth was less than the MSA average.

The MSA employment picture looks similar. Table 3.4 presents employment levels for the MSA and all six counties from 1980 to 2008. The information in Table 3.4 is based on U.S. Census Bureau County Business Patterns data. Over the 30 year period, Mecklenburg County has the largest level of employment. In 1980 Gaston County had the second largest level of employment and ranked well ahead of the other four MSA counties. By 2008 the employment level in Gaston County was actually lower than in 1980. In addition, Gaston County slipped to number three in total employment behind York County and barely ahead of Cabarrus County.

Table 3.4

Total County Employment 1980-2008				
County	1980	1990	2000	2008
Cabarrus	35,324	35,191	52,821	63,125
Gaston	67,413	72,861	70,768	65,344
Anson	6,542	7,404	6,219	5,344
Mecklenburg	238,593	366,224	498,694	560,059
Union	20,323	30,003	39,205	51,805
York	30,322	40,703	55,687	69,614
MSA	398,517	552,386	723,394	815,291

Table 3.5 presents the percent of total MSA employment for each of the six counties within the Charlotte MSA. Mecklenburg County is the clear leader in percent of total MSA employment.

In 1980 Mecklenburg accounted for 59.9 percent of total MSA employment, and by 2008 it accounted for 68.7 percent. The obvious outlier is Gaston County. In 1980 Gaston County provided 16.9 percent of total MSA employment and was behind Mecklenburg. By 2008 Gaston County accounted for only 8.0 percent of total MSA employment and had dropped to third in total MSA employment in a virtual tie with Cabarrus County.

Table 3.5

County Percent of MSA Total Employment 1980-2008				
County	1980	1990	2000	2008
Cabarrus	8.86%	6.37%	7.30%	7.74%
Gaston	16.92%	13.19%	9.78%	8.01%
Anson	1.64%	1.34%	0.86%	0.66%
Mecklenburg	59.87%	66.30%	68.94%	68.69%
Union	5.10%	5.43%	5.42%	6.35%
York	7.61%	7.37%	7.70%	8.54%
MSA	100.00%	100.00%	100.00%	100.00%

Table 3.6 presents the total employment growth within the MSA over the past four decades. Overall, the MSA has increased its total employment level by 104.6 percent in 38 years. Three of the six counties have exceeded the overall MSA average. Union County has seen its total employment level increase by 154.9 percent, followed by Mecklenburg with a 134.7 percent increase. Gaston and Anson Counties are the only counties in the MSA where the employment level has declined during the past 38 years. Only one other county has experienced a decline in employment during any one period and that was Cabarrus County during the 1980-1990 time period.

Table 3.6

Total Employment Growth 1980-2008				
County	1980-90	1990-00	2000-08	1980-2008
Cabarrus	-0.38%	50.10%	19.51%	78.70%
Gaston	8.08%	-2.87%	-7.66%	-3.07%
Anson	13.18%	-16.00%	-14.07%	-18.31%
Mecklenburg	53.49%	36.17%	12.31%	134.73%
Union	47.63%	30.67%	32.14%	154.91%
York	34.24%	36.81%	25.01%	129.58%
MSA	38.61%	30.96%	12.70%	104.58%

Part A: Gaston County economic history

There are two primary and related causes for Gaston County's meager population growth and negative employment growth during the past four decades. The first is the historic economic structure of the county that resulted from the rapid and relocation of the U.S. textile industry from New England to the Carolina Piedmont during the later part of the 19th century. The second, which is related because it led to the relocation of the textile industry, is the presence of water power and later hydroelectric power in the western Piedmont region of the Carolinas. The Catawba River basin provided this resource but also has been a geographic barrier to both Gaston and Lincoln Counties during the second half of the 20th century and has blocked Gaston County's ability to take advantage of its proximity to one of the fastest growing counties in the U.S.

Gaston County is located just west of Mecklenburg County in the southern Piedmont of North Carolina. It is the 74th largest in land area of the 100 North Carolina counties. It contains 364.5 square miles and ranks 8th (2010) in county population. Gaston County became a county in 1846 and during most of its growth and development remained independent from Charlotte and the concept of an MSA.

The county's economic development history begins in the latter part of the 19th century as the textile industry began to move south from New England to the Carolina Piedmont. Manufacturers originally moved to the Carolinas due to the proximity of raw materials, abundant water power of the Piedmont's rivers, and inexpensive labor. By the early 20th century, the Piedmont of North Carolina was the textile capital of the U.S. Hydroelectric mills began replacing water powered mills during this time, but the Piedmont's river structure still remained the important resource for the expanding textile cluster. Over the next 60 years, Gaston County, along with a number of other Piedmont counties, benefited from the economic opportunities that the textile industry provided.

Part B: The decline of manufacturing and the textile industry

In the 1980s the counties that benefited from the growth of the textile industry experienced a negative economic structural change. North Carolina had 835,585 workers employed by manufacturing firms in 1980 which accounted for 42.4 percent of total North Carolina employment. Of that, 244,535 jobs were in textile mills. North Carolina accounted for 28.7 percent of total U.S. employment in the textile industry. By 1990 manufacturing employment in North Carolina was still growing but accounted for only 32.3 percent of total state employment. Textile employment had declined to 206,324 by 1990, a loss of over 38,000 jobs. In 2000 manufacturing employment in North Carolina fell to 731,399, a loss of 135,000 jobs in ten years, and accounted for 21.6 percent of total state employment. Textile employment fell to 116,262, a loss of over 80,000 jobs in ten years.

By 2008 the picture was even worse. Manufacturing employment in North Carolina was 502,878, a loss of 228,612 jobs in just eight years. This was just 14.0 percent of total employment, and textile employment fell to only 44,288, a loss of another 71,974 jobs in just eight years.

Tables 3.7 through 3.9 provide insight into the structural shift in manufacturing and textile employment within Gaston County over the past 38 years. Manufacturing employment declined from 42,302 in 1980 to 14,813 in 2008. This is a reduction in manufacturing employment as a percent of total employment from 62.8 percent in 1980 to 22.7 percent in 2008. In 1980 Gaston County had one of the highest percentages of manufacturing employment among North Carolina counties, and over half of Gaston's manufacturing employment was in textile mills and apparel industries. Over 100 textile mills called Gaston County home in 1980. By 1990 textile employment fell by over 7,000 jobs, about the same level of decline experienced by total manufacturing employment.

The decline became apparent by 2000. The textile industry lost another 8,000 jobs in Gaston County and mills began closing during that decade. Between 1980 and 2000 improved technology and the substitution of capital for labor caused the change in the textile industry and

in textile employment in Gaston County. However, in the years between 2000 and 2008, the real structural change occurred. The number of textile mills in Gaston County dropped from 83 in 2000 to just 38 by 2008. This is a decline of 54.2 percent in textile establishments in just eight years.

Table 3.7

Gaston County Manufacturing and Textile Employment: 1980-2008				
Item	1980	1990	2000	2008
Manufacturing Employment	42,302	36,244	24,677	14,813
Textile Employment	24,735	17,139	9,118	3,951
Apparel Employment	1,714	2,460	630	15
Manufacturing Establishments	420	480	436	331
Textile Establishments	101	99	83	38
Apparel Establishments	21	26	15	3

Table 3.8

Manufacturing Employment as a Percent of Total Employment 1980-2008				
County	1980	1990	2000	2008
Cabarrus	65.92%	40.78%	24.71%	12.29%
Gaston	62.75%	49.74%	34.87%	22.67%
Lincoln	57.57%	53.37%	39.11%	26.28%
Mecklenburg	9.07%	6.97%	7.50%	5.20%
Union	47.62%	45.06%	33.67%	21.74%
York	51.72%	34.75%	7.13%	14.45%
MSA	29.51%	19.96%	13.60%	9.42%

Table 3.9

Gaston County Manufacturing and Textile Employment: 1980-2008				
Item	1980-90	1990-2000	2000-2008	1980-2000
Manufacturing Employment	-14.32%	-31.91%	-39.97%	-64.98%
Textile Employment	-30.71%	-46.80%	-56.67%	-84.03%
Apparel Employment	43.52%	-74.39%	-97.62%	-99.12%
Manufacturing Establishments	14.29%	-9.17%	-24.08%	-21.19%
Textile Establishments	-1.98%	-16.16%	-54.22%	-62.38%
Apparel Establishments	23.81%	-42.31%	-80.00%	-85.71%

Part C: Regional employment growth and structural change

Prior to 1980 the counties surrounding Mecklenburg County had a degree of economic structural independence. That is, the Gaston, Cabarrus, and Lincoln County economies were primarily based on manufacturing with a concentration of textile firms. Union County and York County

also relied on manufacturing employment as their economic base but had lesser reliance on textiles. Union County, specifically, had a large agricultural component to its economy. Beginning in 1990 the counties surrounding Mecklenburg that started losing manufacturing employment began building their new economic base off the non-manufacturing economy of Mecklenburg County. The counties of Cabarrus, Union, and York initially became bedroom communities of Mecklenburg as population spilled over county lines.

This spillover was supported by both strong transportation channels into these three counties and by the low density settlement patterns just over the county line. A phase of local service based economic growth associated with the new households followed the initial phase of suburbanization. Gaston, and to a lesser extent Lincoln, did not benefit from their proximity to Mecklenburg County during this transition period. The main reason for this difference is the lack of transportation channels from Mecklenburg County into Gaston County.

The Catawba River, which was instrumental in the early economic development of the Gaston economy, presented a geographical barrier to the county's ability to tap into the rapid growth of Mecklenburg County. The only river crossings into Gaston County from Mecklenburg County are along the I-85/US 29-74 corridor and NC 27 further north into Mt Holly. The central third of Gaston County along the I-85 corridor is the traditional center of the region's textile industry. As a result, the area offered little opportunity for subdivision development and did not experience the service industry employment growth experienced by the counties located east and south of Mecklenburg. In fact, the least densely populated region of Gaston County has virtually no reasonable access to Mecklenburg County. In the entire southern third of Gaston County there is no road access crossing into Mecklenburg County. This lack of access makes the southern third of Gaston County effectively further away from Charlotte and the central concentration of the regional economy.

Part D: The new Gaston economy

Despite the structural change that has taken place in the Gaston County economy over the past three decades, there is some positive news. Table 3.10 presents non-manufacturing employment

levels over the past 28 years for all six counties in the Charlotte MSA. During this time, overall Gaston County employment declined (see Table 4), losing 2,000 jobs between 1980 and 2008. However, the Gaston County economy actually added 25,000 non-manufacturing jobs during the same period. The simple analysis indicates that the massive job loss in the manufacturing sector (over 27,000 jobs) overwhelmed the rest of the economy. The structural change that took place simply outpaced the non-manufacturing job growth that spun off from the Charlotte economic engine.

Table 3.10

Non-Manufacturing Employment 1980-2008				
County	1980	1990	2000	2008
Cabarrus	12,037	20,840	39,767	55,368
Gaston	25,111	36,617	46,091	50,531
Anson	4,308	4,462	2,886	1,462
Mecklenburg	216,946	340,692	461,288	530,944
Union	10,646	16,485	26,003	40,541
York	14,638	26,558	51,716	59,557
MSA	116,905	108,252	95,196	74,468

Table 3.11 presents the annualized percent changes in non-manufacturing employment for the six counties in the Charlotte MSA. While Gaston County's non-manufacturing job growth rate is the lowest among the six counties, it is not grossly out of line with the Mecklenburg rate and less than a percent lower than the overall MSA rate. This non-manufacturing job growth rate presents hope and opportunity for the future Gaston County economy. The critical issue for the present Gaston economy is the magnitude going forward of the structural change in the county's economy. The decline of the textile industry within the U.S. and the Piedmont is close to its end. As of 2008, Gaston County has fewer than 4,000 workers employed in the textile industry (down from over 26,000 in 1980). In addition, the county has a little over 10,000 workers employed by non-textile manufacturing firms. During the next several decades, Gaston County's textile and other manufacturing industries' job loss rate should diminish, and the current non-manufacturing job growth rate should continue, providing an overall positive employment growth rate going forward. The only question is how strong that overall rate will be? Within a decade the manufacturing job losses should end and the overall job growth rate will become driven by non-manufacturing job growth.

Table 3.11

Annualized Percent Changes in Non-Manufacturing Employment				
County	1980-90	1990-00	2000-08	1980-2008
Cabarrus	5.64%	6.67%	4.22%	4.36%
Gaston	3.84%	2.33%	1.16%	2.19%
Anson	2.79%	1.26%	1.92%	1.44%
Mecklenburg	4.62%	3.08%	1.77%	2.73%
Union	4.47%	4.66%	5.71%	3.24%
York	6.14%	6.89%	1.78%	4.61%
MSA	4.66%	3.53%	2.08%	2.91%

Using the most recent eight year non-manufacturing job annualized growth rate, by 2020 Gaston County would add around 10,000 jobs (all non-manufacturing) and reach an employment level of 75,000 jobs. This would only be a little over 2,000 jobs higher than the peak employment level in 1990, but it would reverse the 18 year trend of declining job growth and opportunities for Gaston County.

Based on the shift in structural change outlined in this section, the next section of this study will look at the long run forecast from employment and population levels and growth under a range of alternative scenarios.

Section 4: Economic Impact of the Garden Parkway: 2008-2035

Part A: Construction impact: 2012-2015

The proposed Garden Parkway is a 21.8 mile limited access highway which begins in Mecklenburg County at I-485 near Douglas International Airport, heads west across the Catawba River through southern Gaston County, and turns north to intersect with I-85 west of US 321. The proposed construction plan is estimated to take four years, beginning in 2012, with the road open to traffic in late 2015. The estimated construction cost is \$870 million, with roughly 85.9 percent of the construction costs occurring within Gaston County.

The following section details the economic impact on the Gaston County economy of the proposed Garden Parkway construction over the 2012 through 2015 period. The \$870 million total cost is divided evenly into the four years of construction, and 85.85 percent of the annual construction budget of \$217.5 million is allocated for spending within Gaston County each year.

To assess the total economic impact accurately, the direct output of the proposed activity must be estimated. In this case, the direct output on Gaston County for the four years of construction is \$186,723,750 per year. The term direct refers to the dollar output associated with the economic activity under consideration.

The multiplier concept then captures the total effect of the economic activity on output and employment in the overall economy. For instance, an output multiplier value of 2.1 means that for each dollar of direct spending in an industry, 1.1 additional dollars are generated in other parts of the economy, with the total benefit to the economy being 2.1 dollars. Therefore, an event that creates \$100 million in new expenditures in an industry would, using the multiplier, translate into a subsequent output gain of \$110 million in other sectors, for a total output impact of \$210 million.

The Minnesota IMPLAN Group provides the basic multiplier methodology used in this study. IMPLAN is a multiplier methodology originally developed by the United States Government and currently maintained by the Minnesota IMPLAN Group. For this study, output, employment, and income multipliers for the construction of other new nonresidential structures, IMPLAN sector code 36, was used.

This study used the IMPLAN 152 by 152 multiplier matrix for Gaston County to obtain multipliers for dollar output, employment, and income. This matrix provides multipliers for 152 detailed three and four-digit North American Industrial Classification System (NAICS) industries. In addition, each of the 152 industries has an industry-specific *indirect* multiplier for each of the other 151 industries and for its own industry. Table 4.1 presents the IMPLAN output multipliers used in this study for the 2012 impacts on Gaston County. The multipliers are based on 2009 data (the latest available) and are used to estimate the economic impact of the Garden

Parkway construction for the years 2012 through 2015. The multipliers used for the 2012 through 2015 impacts have all been adjusted to account for inflation over the period since 2009. The adjustment process applies only to the employment multipliers which are based on jobs created per \$1,000,000 of direct construction expenditure. The adjustment process used the Bureau of Labor Statistics CPI to account for the effects of inflation on the number of jobs created per \$1,000,000 in construction expenditures.

Table 4.1

Gaston County IMPLAN Adjusted Multipliers for 2012 (IMPLAN Code 36)

Multiplier Type	Direct Effects	Indirect Effects	Induced Effects	Total Effects
Employment*	9.730904	1.967891	2.583911	14.282705
Output	1.000000	0.172849	0.256599	1.429448
Income	0.350955	0.072012	0.088688	0.511656

* Jobs per \$1,000,000 of expenditures

The IMPLAN multipliers also provide a comprehensive set of disaggregated multipliers that can estimate the indirect and induced impacts separately from the total impact at the regional level. The indirect effect is the additional economic activity of the supply chain within the region caused by the economic activity of the direct industry. The induced effect is the additional economic activity of all other unrelated firms and households within the region caused by the economic activity of the industry and the indirect effect.

Table 4.2 presents the 2012 impact on output, jobs, and income of the proposed construction of the Garden Parkway and the Gaston County economy. The \$186,723,750 in direct construction expenditures will generate 1,817 direct jobs, 367 indirect (supplier chain) jobs, and 482 induced jobs, for a total 2,667 jobs in 2012. This would represent an increase in Gaston County jobs of 3.9 percent during 2012. Total economic impact of the road construction during 2012 would be \$266,911,891. In addition, the 2,667 total jobs supported by the construction of the road would increase Gaston County income by \$95,538,140 during the year.

Table 4.2

Gaston County Garden Parkway Construction Economic Impact for 2012

Multiplier Type	Direct Effects	Indirect Effects	Induced Effects	Total Effects
Employment	1,817	367	482	2,667
Output	\$186,723,750	\$32,275,013	\$47,913,128	\$266,911,891
Income	\$65,531,634	\$13,446,351	\$16,560,156	\$95,538,140

Table 4.3 presents similar information as Table 4.2. The economic output and income impacts are the same as Table 4.2 for 2012. However, the jobs impact during 2013 is slightly lower because of the effects of inflation on job creation. Direct jobs generated by the road construction in 2013 are expected to reach 1,788. Indirect (supplier chain) job are estimated to be 362, and induced jobs should reach 475. Total employment impact of the road construction on Gaston County during 2013 should reach 2,624 jobs.

Table 4.3

Gaston County Garden Parkway Construction Economic Impact for 2013

Multiplier Type	Direct Effects	Indirect Effects	Induced Effects	Total Effects
Employment	1,788	362	475	2,624
Output	\$186,723,750	\$32,275,013	\$47,913,128	\$266,911,891
Income	\$65,531,634	\$13,446,351	\$16,560,156	\$95,538,140

Table 4.4 and Table 4.5 present the output, employment, and income impacts for 2014 and 2015. As in Table 4.3, the output and income impacts are the same, and the employment impacts are adjusted for inflation in the same manner.

Table 4.4

Gaston County Garden Parkway Construction Economic Impact for 2014

Multiplier Type	Direct Effects	Indirect Effects	Induced Effects	Total Effects
Employment	1,759	356	467	2,582
Output	\$186,723,750	\$32,275,013	\$47,913,128	\$266,911,891
Income	\$65,531,634	\$13,446,351	\$16,560,156	\$95,538,140

Table 4.5

Gaston County Garden Parkway Construction Economic Impact for 2015

Multiplier Type	Direct Effects	Indirect Effects	Induced Effects	Total Effects
Employment	1,730	350	459	2,540
Output	\$186,723,750	\$32,275,013	\$47,913,128	\$266,911,891
Income	\$65,531,634	\$13,446,351	\$16,560,156	\$95,538,140

Table 4.6 presents information on the top 12 spin-off industries. The industries are ranked by the total number of indirect and induced jobs that the construction phase of the Garden Parkway will support during the first year of construction (2012). The Architectural and engineering services sector will benefit the most with 92 indirect (supplier chain) jobs, and one induced job for a total 93 jobs supported during 2012. The top three supplier chain industries are Architectural,

engineering, and related services (92 jobs); Employment services (28 jobs); and Automotive repair and maintenance, except car washes (25 jobs).

Table 4.6

Garden Parkway Construction Impact Spin-off Impact 2012

IMPLAN Sector	Description	Direct	Indirect	Induced	Total
369	Architectural, engineering, and related services	0	92	1	93
413	Food services and drinking places	0	11	65	77
382	Employment services	0	28	9	38
360	Real estate establishments	0	11	23	33
397	Private hospitals	0	0	33	33
414	Automotive repair and maintenance, except car washes	0	25	7	32
329	Retail Stores - General merchandise	0	12	20	31
394	Offices of physicians, dentists, and other health pract.	0	0	30	30
324	Retail Stores - Food and beverage	0	7	18	25
388	Services to buildings and dwellings	0	15	9	24
425	Civic, social, professional, and similar organizations	0	9	14	22
398	Nursing and residential care facilities	0	0	22	22
	All Other Industries	1,817	158	233	2,208
	Total	1,817	367	482	2,667

Overall, the Garden Parkway will provide an economic stimulus to the Gaston County economy during the four years of construction. In fact, had the construction taken place as part of the American Recovery and Reinvestment Act it would have made a significant dent in the county's unemployment rate during 2009 and 2010. Gaston County's unemployment rate, which peaked at 14.5 in March of 2010, would have fallen to as low as 11.8 percent during that month. The rate in February, 2011 of 11.4 percent would instead have been 8.6 percent. These reductions in the county's unemployment rate during these difficult times would have changed substantially the economic outlook for an economy that has been through three decades of economic decline.

Part B: Ongoing economic impact of the Garden Parkway: 2015-2035

This part of the report provides population, household, and employment projections for Gaston County through 2035 based on a No-Build Scenario of the Garden Parkway and two different Build Scenarios of the Garden Parkway. The North Carolina Office of State Budget and Management and the South Carolina Budget and Control Board both produce population estimates for counties within their states through 2030. These projections are part of a Federal State Cooperative Population Estimates program begun in 1975. Each state has appointed a

single agency within the state with this responsibility. For North Carolina, the agency released these estimates in September of 2010.

Table 4.7 below is based on the North Carolina and South Carolina population projections through 2030. Both state population projections currently provide certified population estimates for each year since the 2000 Census through 2009. The estimates in the column labeled 2009 are each state's certified estimates for 2009. The 2009 certified estimates are based on the 2000 U.S. Census count and take into consideration annual births, deaths, and net migration.

Since these certified estimates, the U.S. Census released the 2010 population counts for all counties in both states. As a result, two adjustments have been made. First, the annualized rate of growth for the six counties in the Charlotte MSA for 2009 through 2020 and 2020 through 2030 that was calculated by both state agencies was applied to the actual 2010 census data just released. Second, the 2035 population projection was based on the annualized rate of growth for each county between 2020 and 2030. Both the 2009 certified estimates and the 2010 actual U.S. Census count are contained in Table 4.7 to provide an assessment of the accuracy of the state population projection program. The certified 2009 projections are all based on the historic demographic factors in each county between 2000 and 2009. These annual growth rate projections do not take into account any changes in infrastructure taking place over the next two decades. As a result, the county population projections presented in Table 4.7 provide an ideal baseline (No-Build) estimate for this study.

Table 4.7 provides the population projections through 2035 in each county in the Charlotte MSA for the No-Build Scenario. Gaston County population under the No-Build Scenario will reach 259,245 persons by 2035. This is an increase in population over the next 25 years of 53,159 persons, an increase of 25.8 percent over the 2010 actual count. Of the other five counties within the Charlotte MSA, only Anson County is projected to have both a smaller absolute population increase and a smaller percent increase.

Table 4.7
Charlotte MSA Population Projections: No-Build Scenario

County	2000	2009*	2010 Actual**	2020	2030	2035
Cabarrus	130,778	174,255	178,011	227,705	276,818	305,215
Gaston	190,365	207,234	206,086	227,124	248,063	259,245
Anson	25,275	25,193	26,948	26,593	26,534	26,505
Mecklenburg	695,454	894,290	919,628	1,071,543	1,222,331	1,305,504
Union	123,677	196,322	201,292	250,450	299,087	326,840
York	164,614	215,610	226,073	261,317	297,601	317,591
MSA	1,330,163	1,712,904	1,758,038	2,064,732	2,370,434	2,540,900

* Certified estimates
** 2010 U.S. Census (actual count)

Table 4.8 presents the population No-Build/Build Scenarios for Gaston County for the years 2010, 2020, 2030, and 2035. The Build Scenario Base projections for 2010 through 2015 (before the road is completed) are based on the annualized population growth rate of Gaston County between 2009 and 2020 from the North Carolina projections. The Build Scenario Base projection for 2016 through 2020 is based on the annualized population growth rate for North Carolina between 2009 and 2020 from the North Carolina projections. The Build Scenario Base projection for 2020 through 2035 is based on the annualized population growth rate for North Carolina between 2020 and 2035 from the North Carolina projections.

Table 4.8
Gaston County Population Projections: (No-Build/Build Scenarios)

Scenario	2010	2020	2030	2035
No-Build	206,086	227,124	248,063	259,245
Build Base	206,086	231,356	259,407	274,683
Build Alternative	206,086	234,471	269,217	288,475

The Build Scenario Alternative projections for 2010 through 2015 (before the road is completed) are based on the annualized population growth rate of Gaston County between 2009 and 2020 from the North Carolina projections. The Build Scenario Alternative projection for 2016 through 2020 is based on the annualized population growth rate for the MSA between 2009 and 2020 from the North Carolina projections. The Build Scenario Alternative projection for 2020 through 2035 is based on the annualized population growth rate for the MSA between 2020 and 2035 from the North Carolina projections.

Gaston County population is expected to increase to 274,683 by 2035 under the Build Base Scenario. This is an increase of 15,438 persons compared to the No-Build Scenario. Under the Build Alternative Scenario Gaston County population is expected to increase to 288,475, an increase of 29,230 persons compared to the No-Build Scenario.

Table 4.9 presents the household No-Build/Build Scenarios for Gaston County for the years 2010, 2020, 2030, and 2035. These estimates are based on the population projections presented in Table 4.8 and the average household size of 2.58 persons for Gaston County from the 2010 Census. Average household size has declined within the U.S. and Gaston County for the past several decades. In 1980 Gaston County average household size was 2.88 persons. Today it is 2.58 persons. The use of 2.58 persons for calculating the number of households through 2035 is based on the assumption that the average household size has been stable between 2000 and 2010. In addition, because of the difficult economic times, household size may increase in the short term before beginning to decline in the later years of the projection period.

Gaston County households are expected to increase to 106,468 by 2035 under the Build Base Scenario. This would be an increase of 5,983 households compared to the No-Build Scenario. Under the Build Alternative Scenario Gaston County households are expected to increase to 111,796, an increase of 11,328 households compared to the No-Build Scenario.

Table 4.9
Gaston County Household Projections: (No-Build/Build Scenarios)

Scenario	2010	2020	2030	2035
No-Build	79,867	88,020	96,135	100,468
Build Base	79,867	89,660	100,531	106,451
Build Alternative	79,867	90,867	104,333	111,796

In 1980 Gaston County was the second largest county within the Charlotte MSA. In addition, it was the sixth largest county of the 100 counties in North Carolina. By 2010 Gaston County had fallen to the 10th largest county in the state and the third largest county in the MSA. Under all three scenarios presented in Table 4.8, by 2035 Gaston County will be the fifth largest county in the Charlotte MSA. Both Union and Cabarrus Counties will exceed Gaston County in population and households by 2035.

Table 4.10 presents the employment projections under the No-Build/Build Scenarios for Gaston County for the years 2010, 2020, 2030, and 2035. The No-Build projections are based on 2008 actual employment numbers for Gaston County. The 2020, 2030, and 2035 employment projections assume no additional manufacturing job losses and increase annually by the current rate of non-manufacturing job growth (2000-2008) applied to the overall job level. This growth assumption is based on two factors.

First, as detailed in Section 3 of this report, the massive structural change that took place in the Gaston County economy over the past three decades is likely over. In 2008 Gaston County had a little over 14,000 manufacturing jobs. Of those 14,000, less than 4,000 are in the textile sector. Going forward over the next 25 years it is unlikely that Gaston County will continue to suffer manufacturing job loss levels and rates anywhere near those experienced during the 1980 to 2008 period.

Second, Gaston County is transitioning into a suburban county in the Charlotte MSA. In the past, Gaston County had its own economic base that drove the county economy. Today, Gaston's economic fortunes rely on the economic growth of Mecklenburg County and the population and employment spillover as Mecklenburg becomes denser.

Under the No-Build Scenario Gaston County employment will reach a level of 89,127 jobs by 2035. In 1980 Gaston County had the second largest employment level of the six counties in the Charlotte MSA. Under the No-Build Scenario Gaston County will drop to fifth in the total employment behind Cabarrus, Union, and York Counties.

Table 4.10

Gaston County Employment Projections: (No-Build/Build Scenarios)

Scenario	2008	2020	2030	2035
No-Build	65,344	75,010	84,148	89,127
Build Base	65,344	77,759	93,743	102,928
Build Alternative	65,344	78,508	96,480	106,955

Under the Build Base Scenario Gaston County's employment should reach 102,928 jobs by 2035. This employment growth scenario is based on the assumption that the Garden Parkway

will be built between 2012 and 2015. This also assumes no addition manufacturing job losses will occur, the employment growth rate between 2008 and 2015 will be the same as the No-Build Scenario, and that the job growth rate between 2015 and 2035 will be the North Carolina average non-manufacturing job growth rate. This rate is considerably less than the non-manufacturing growth rates for Cabarrus, Anson, Mecklenburg, Union, and York Counties.

Under the Build Alternative Scenario Gaston County's employment should reach 106,955 jobs by 2035. This employment growth scenario is based on the assumption that the Garden Parkway will be built between 2012 and 2015. This also assumes no addition manufacturing job losses will occur, the employment growth rate between 2008 and 2015 will be the same as the No-Build Scenario, and that the job growth rate between 2015 and 2035 will be the MSA average non-manufacturing job growth rate. This rate is considerably less than the non-manufacturing growth rates for Cabarrus, Union, and York Counties and about the same growth rate as Mecklenburg and Anson Counties.

The No-Build/Build Base Scenario job difference by 2035 is just under 14,000 jobs. Under the No-Build/Build Alternative Scenario, the 2035 job difference just under 18,000 jobs. Two important aspects lead to these significant job growth differences. First, the Garden Parkway will provide increased access to the state's largest and most vibrant private sector economy. Currently, both Gaston and Lincoln Counties have substantially restricted access to Mecklenburg County because of the Catawba River. This barrier makes it difficult for these two counties to tap into the natural spillover of Mecklenburg economic activity compared to Cabarrus, Union, and York counties. In fact, this barrier is the most important reason for the growth differences between Gaston County and the other three counties over the past decade.

Second, in 2010 Mecklenburg County is the largest county in North Carolina with 919,628 persons. It is also the most densely populated county in the state with almost 1,750 persons per square mile. With 2035 population expected to reach 1,305,504 persons and population density to reach almost 2,500 persons per square mile in Mecklenburg County, the surrounding counties will have to take spillover population and employment growth. The Garden Parkway and its bridge over the Catawba River will afford Gaston County the opportunity to tap into the

Mecklenburg County expected growth over the next 25 years and compete effectively with the other contiguous counties within the Charlotte MSA.

Section 5: Conclusions

- The overwhelming conclusion of both the scholarly literature and the professional literature is that there is a significant relationship between building interstate highway s and local economic development.
- Gaston County has experienced a significant economic structural change in its economy over the past three decades. Resulting in a loss of 38,000 manufacturing jobs and 20,000 textile jobs.
- Gaston County has not participated in the strong economic growth of the Charlotte MSA over the past 30 years. It has lagged behind in both population and employment compared to Cabarrus, Union, and York.
- Much of this three decade long weak economic performance has been a result of geographic isolation compared to Cabarrus, Union, and York.
- The construction of the Garden Parkway will lesson considerably the geographic isolation of Gaston County and allow the county to participate in the overall economic growth of the Charlotte MSA.
- During the four years of highway construction, Gaston County employment should experience over 2,600 additional jobs.
- With the construction of the Garden Parkway, Gaston County population by 2035 should reach 274,683 under the Build base Scenario, or 288,475 under the Build alternative Scenario, compared to 259,245 under the No-Build Scenario.
- With the construction of the Garden Parkway, the number of Gaston County households by 2035 should reach 106,451 under the Build base Scenario, or 111,796 under the Build alternative Scenario, compared to 100,468 under the No-Build Scenario.
- With the construction of the Garden Parkway, Gaston County employment by 2035 should reach 102,928 under the Build base Scenario, or 106,955 under the Build alternative Scenario, compared to 89,127 under the No-Build Scenario.
- The construction of the Garden Parkway has the potential to change the future economic fortunes of Gaston County.

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From: [Kym Hunter](#)
To: [Harris, Jennifer](#);
cc: ["Slusser, Scott"](#); [Dewitt, Steve](#);
Subject: Garden Parkway Economic Development Study
Date: Wednesday, April 20, 2011 8:53:00 AM
Attachments: [EconomicImpactofGardenParkway.pdf](#)

Dear Ms. Harris,

As you may know, yesterday Dr. John Connaughton of UNCC released the Garden Parkway Economic Development Study on behalf of the Gaston Chamber of Commerce. The study appears to suggest that the EIS did not fully account for all the growth and development that will be induced by construction of the Garden Parkway, and that levels of growth and development will, in fact, be much higher than previously anticipated.

Will FHWA and the Turnpike Authority address the differences between this new study and the EIS prior to publishing a Record of Decision for the Garden Parkway?

A presentation of the study results is attached to this e-mail.

Thank you,

Kym Hunter
 Associate Attorney
 Southern Environmental Law Center
 *** NEW ADDRESS***
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 Chapel Hill, North Carolina 27516-2356
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From: Harris, Jennifer
To: Kym Hunter;
cc: "Slusser, Scott"; Dewitt, Steve; Shumate, Christy;
 Jill Gurak;
Subject: RE: Garden Parkway Economic Development Study
Date: Monday, May 02, 2011 11:54:15 AM

Ms. Hunter,

Thank you for sending the report. Yes, we will review it and act accordingly.

Sincerely,
~Jennifer

Jennifer Harris, P.E.
 Director of Planning and Environmental Studies
 NC Turnpike Authority
 an entity of the NC Department of Transportation

Mailing Address:	Physical Address:
1578 Mail Service Center	5400 Glenwood Avenue, Suite 400
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-----Original Message-----

From: Kym Hunter [<mailto:khunter@selcnc.org>]
Sent: Monday, May 02, 2011 11:50 AM
To: Harris, Jennifer
Cc: 'Slusser, Scott'; Dewitt, Steve
Subject: RE: Garden Parkway Economic Development Study

Dear Ms. Harris,

Please find attached the final report from Dr. Connaughton. I understand that you will now review this report and address any potential questions it raises about the accuracy of the EIS. I look forward to hearing your conclusions regarding the accuracy of both the report and the EIS.

Thank you,
Kym Hunter

-----Original Message-----

From: Harris, Jennifer [<mailto:jhharris1@ncdot.gov>]
Sent: Wednesday, April 27, 2011 1:10 PM
To: Kym Hunter
Cc: 'Slusser, Scott'; Dewitt, Steve
Subject: RE: Garden Parkway Economic Development Study

Ms. Hunter,

If the draft and/or final report prepared/being prepared by the Gaston Chamber of Commerce is released for review, we will certainly review it and act accordingly.

Sincerely,
~Jennifer

Jennifer Harris, P.E.
 Director of Planning and Environmental Studies NC Turnpike Authority an entity of the NC Department of Transportation

Mailing Address:	Physical Address:
1578 Mail Service Center	5400 Glenwood Avenue, Suite 400
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-----Original Message-----

From: Kym Hunter [<mailto:khunter@selcnc.org>]
Sent: Wednesday, April 27, 2011 8:36 AM
To: Harris, Jennifer
Cc: 'Slusser, Scott'; Dewitt, Steve
Subject: RE: Garden Parkway Economic Development Study

Ms. Harris,

Thank you for your response. I understand that there is a draft report available for review currently. Do I understand correctly that you are waiting for the final report to be published?

Thank you,

Kym Hunter
 Associate Attorney
 Southern Environmental Law Center
 *** NEW ADDRESS***
 601 West Rosemary Street, Suite 220
 Chapel Hill, North Carolina 27516-2356
 Phone: (919) 967-1450; Fax: (919) 929-9421 SouthernEnvironment.org

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-----Original Message-----

From: Harris, Jennifer [mailto:jhharris1@ncdot.gov]
 Sent: Tuesday, April 26, 2011 10:21 AM
 To: Kym Hunter
 Cc: 'Slusser, Scott'; Dewitt, Steve
 Subject: RE: Garden Parkway Economic Development Study

Ms. Hunter,

We are aware that the Gaston Chamber of Commerce prepared a study. If the study is released for review, we will certainly review it and act accordingly.

Sincerely,
 ~Jennifer

Jennifer Harris, P.E.
 Director of Planning and Environmental Studies NC Turnpike Authority an entity of the NC Department of Transportation

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-----Original Message-----

From: Kym Hunter [mailto:khunter@selcnc.org]
 Sent: Wednesday, April 20, 2011 8:53 AM
 To: Harris, Jennifer
 Cc: 'Slusser, Scott'; Dewitt, Steve
 Subject: Garden Parkway Economic Development Study

Dear Ms. Harris,

As you may know, yesterday Dr. John Connaughton of UNCC released the Garden Parkway Economic Development Study on behalf of the Gaston Chamber of Commerce. The study appears to suggest that the EIS did not fully account for all the growth and development that will be induced by construction of the Garden Parkway, and that levels of growth and development will, in fact, be much higher than previously anticipated.

Will FHWA and the Turnpike Authority address the differences between this new study and the EIS prior to publishing a Record of Decision for the Garden Parkway?

A presentation of the study results is attached to this e-mail.

Thank you,

Kym Hunter
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Appendix C2 – Citizen Comments

Table C2-13: Southern Environmental Law Center

Document: p026 letter dated Dec 22, 2011

COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
1	General	It has now been over a year since the publication of the Final Environmental Impact Statement (“FEIS”) for the Gaston East-West Connector (the “Toll Highway”). On behalf of the Catawba Riverkeeper and Clean Air Carolina, the Southern Environmental Law Center (“SELC”) submitted comments on that document on February 22, 2011, having also submitted comments on the Draft EIS in July, 2009.	The SELC’s letter of February 22, 2011 is addressed in Appendix C2 of the ROD (letter p001). The SELC’s letter commenting on the Draft EIS dated July 21, 2009 is addressed in the Final EIS in Appendix B3 (letter i012/u002).
2	NEPA Process	In light of the unresolved major issues outlined below and in our earlier comments, we request supplementation of the EIS prior to issuance of the Record of Decision (“ROD”) for this very expensive, environmentally damaging and highly controversial proposal.	A supplement to the EIS is not necessary (40 CFR 1502.09(c)). There have been no substantial changes to the proposed action that are relevant to environmental concerns nor are there significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts.
3	Purpose and Need	Our previous comments centered on the fact no documented underlying transportation purpose has been identified for the Toll Highway project. Indeed, as we have already noted, the FEIS itself demonstrates that one of the proffered primary purposes for the road – reducing congestion on I-85 and the other surrounding roadways – will not, in fact, result from construction of the Toll Highway.	<p>The purpose of the project was not to explicitly improve congestion on I-85 or US 29-74. Existing and projected poor levels of service on these roadways are cited as transportation needs in the area. The project purpose is to “improve east-west transportation mobility in the area around the City of Gastonia, between Gastonia and the Charlotte metropolitan area, and particularly to establish direct access between the rapidly growing area of southeast Gaston County and western Mecklenburg County.”</p> <p>As discussed in Section 1.3 of the Draft EIS and Section 1.2.2 of the Final EIS, project alternatives were evaluated in an iterative process to determine if they were reasonable and practicable. Each alternative concept was evaluated to determine whether it would:</p> <ul style="list-style-type: none"> • Reduce travel distances and/or travel times between representative origin/destination points within southern Gaston County and between southern Gaston County and Mecklenburg County. • Provide a transportation facility with a mainline that would operate at acceptable levels of service (generally LOS D or better on the mainline) in the design year for travel between Gaston County and Mecklenburg County. • Reduce congested vehicle miles traveled and/or congested vehicle hours traveled in Gaston County compared to the No-Build Alternative.
4	Funding	Ultimately, the legislature settled on a budget which eliminated all funding for the project in fiscal year 2011-2012, halved funding to \$17.5 million in fiscal year 2012-2013, and provided no guarantees about funding beyond that date. Accordingly, the Toll Highway project is left without any guaranteed future funding source. This problem was compounded when the Federal Highway Administration declined, for the second time, to provide funding for the project under the Transportation Infrastructure Finance and Innovation Act (“TIFIA”).	Funding for the project allocated for fiscal year 2011-2012 was not needed, as the project planning process had not been completed. The legislature pledged \$17.5 million for fiscal year 2012-2013, and \$35 million per year beginning in fiscal year 2013-2014. Recent financial analyses show that the project is financeable under the current funding scenario.

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Table C2-13: Southern Environmental Law Center

Document: p026 letter dated Dec 22, 2011

COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
5	Funding	As tolls will fund only a fraction of the costs for the Gaston East-West Connector, a substantial amount of taxpayer dollars will need to be expended if the project is constructed. This money could be better spent on a project with a documented transportation need.	<p>Project costs are presented in Final EIS Table 2-3 and Section 2.3 of the ROD. A handout of Frequently Asked Questions (FAQs) was available at the Public Hearing and on the project web page that included information on funding sources. It stated funding for the project would come from multiple sources, including toll revenue bonds and state and federal funds.</p> <p>The project's purpose and need is documented in the EIS. The Gaston Urban Area Metropolitan Planning Organization (GUAMPO) and Mecklenburg-Union Metropolitan Planning Organization (MUMPO) 2030 and 2035 Long Range Transportation Plans have included the Gaston East-West Connector as part of their comprehensive transportation network, with GUAMPO ranking this project their top priority.</p>
6	Alternatives Considered	In particular, as it relates to the EIS process, the Turnpike Authority's narrow focus on pre-determined toll road projects has resulted in a failure to examine alternatives to relieve congestion on I-85, maximize economic development opportunities in the area and achieve other important purposes for major infrastructure investments.	The Draft EIS rigorously explored and objectively evaluated reasonable alternatives as required by 40 CFR 1502.14, including both toll and non-toll options. The alternative screening process utilized a multi-tiered approach, which is described in detail in Chapter 2 of the Draft EIS, and summarized in Section 1.2 of the Final EIS. The approach used earlier qualitative screenings of a wide range of concepts, followed by later quantitative screenings. Opportunities for public and agency involvement and participation were provided throughout the identification and screening of alternatives, as described in Chapter 9 of the Draft EIS. The agency coordination team agreed with and approved the alternatives evaluation through acceptance of Concurrence Point 2 (signed October 7, 2008), and ultimately concurred with the Preferred Alternative as the Least Environmentally Damaging Practicable Alternative (LEDPA - Concurrence Point 3, signed October 13, 2009). The concurrence forms are included in Appendix A-1 of the Draft EIS and Appendix G of the Final EIS, respectively.
7	Funding	Given the continued public opposition, the lack of support for the project in the legislature, and the uncertainty about future funding sources, we request that the Transportation Agencies take a careful look at the advisability of continuing to expend resources to pursue this project before issuance of the ROD.	Governmental agencies and MPOs have had the opportunity to review public input provided on this project and their positions that this project is a top priority have not changed. The project remains a top priority in the Gaston Urban Area MPO (GUAMPO) 2035 Long Range Transportation Plan (LRTP) (see resolution dated March 22, 2011 in ROD Appendix C3). Also, see response to Comment 4 above.
8	Water Resources	Construction of the Gaston East-West Connector will result in significant environmental destruction. The project as proposed would impact 2,237 linear feet of stream per mile of highway, more than double the average of a typical Piedmont highway project. The high level of impacts expected to result from construction of the Toll Highway has prompted the Environmental Protection Agency and other resource agencies to issue comments that raise substantial concerns about the likelihood of the	<p>In the project study area, most streams flow in a north-south direction and this project travels east-west, therefore stream impacts are likely to be higher. Also, project elements and circumstances (typical section needed, alignment, geographic location, length, etc.) are unique to each project.</p> <p>The impacts of each Detailed Study Alternative were minimized to the extent practicable based on available data. Concurrence Point 2a – Bridging and Alignment Decisions to minimize impacts to jurisdictional resources was signed by the Merger</p>

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Table C2-13: Southern Environmental Law Center

Document: p026 letter dated Dec 22, 2011

COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
		Transportation Agencies securing required environmental permits.	<p>Team, including the EPA, on October 7, 2008 (Draft EIS Appendix A-1). Jurisdictional impacts from the refined preliminary designs for the Preferred Alternative were further minimized to the extent practicable, as summarized in Final EIS Section 2.3.3. Concurrence Point 4a –Avoidance and Minimization – was signed on February 16, 2010 (Final EIS Appendix G). EPA concurred conditionally but opted to abstain from signing the concurrence form, noting in an email (included in Final EIS Appendix G) they had reservations concerning the ability to provide adequate mitigation for jurisdictional resources.</p> <p>An abstention means the agency does not actively object to a concurrence point, but chooses not to sign the concurrence form. Further, the agency does not find that the project violates the laws and regulations under its purview, as the agency would have identified any issues through a non-concurrence and not an abstention. The merger process can continue and the agency agrees not to revisit the concurrence point subject to the guidance on revisiting concurrence points included in the Memorandum of Agreement that established the merger process.</p> <p>The Record of Decision includes an update to the Conceptual Mitigation Plan (Section 3.3) and the FHWA and NCTA are continuing to work with EPA and other environmental resource and regulatory agencies through the permitting process to develop mitigation.</p>
9	Agency Coordination	In August of this year additional concerns about environmental impacts emerged from the Lake Wylie Marine Commission, which has dubbed the road “a fence across the river,” noting the impact on wildlife recreation and scenery. The design of the bridges that will be necessary for the toll highway to cross the lake have yet to be presented in final form, but nevertheless have drawn substantial criticism from Lake Wylie Marine Commissioners. It is essential that all such environmental concerns be fully disclosed before any decision is finalized about the project, including the design and location of bridges and other structures. The EIS should be supplemented to address these concerns before a ROD is published.	<p>The NC Turnpike Authority (NCTA) is working with the Lake Wylie Marine Commissioners as part of the process of coordinating with Duke Energy Corporation for a revision to their license from the Federal Energy Regulatory Commission (FERC) for project crossings of the Catawba-Wateree Hydro Project (Final EIS Section 2.5.4.2 and Draft EIS Section 6.2).</p> <p>NCTA coordinated with the Lake Wylie Marine Commission through meetings and correspondence from February through November 2011 to explain the project and address the Commission’s concerns. In a letter dated December 9, 2011, the Lake Wylie Marine Commission states: “We applaud the Authority’s actions to write the request for proposals by the engineering contractor to include addressing these concerns during the design phase. We are pleased to have been invited to interact with the contractor during the design to search for design elements that address these concerns. We also appreciate the economic pressures this project faces and the difficulties this may present to the design.”</p>
10	Indirect and Cumulative Effects	In our February 2011 comments, we raised concerns about the integrity of the Quantitative Indirect and Cumulative Effects analysis prepared for the FEIS.	The SELC’s letter of February 22, 2011 is addressed in Appendix C2 of the ROD (letter p001).
11	Indirect and	As we outlined, the published study indicated a total job shift of 900 jobs to	Comments in the email regarding shifts in growth/employment of 10-15 percent

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COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
	Cumulative Effects	<p>South Carolina from North Carolina in the study area from construction of the Toll Highway. While any net job loss is significant, the FEIS suggested a shift of less than 1% of total jobs, and a net loss of only 300 jobs overall from construction of the project. An e-mail exchange between the authors of the study, however, suggests that the original numbers may have been much higher, with up to 10-15% total job losses in the study area. The exchange also implies that the data behind the study may have been manipulated due to political concerns.</p>	<p>were in reference to changes between the Build and No-Build Scenarios in specific individual traffic analysis zones (TAZs), particularly in the Bessemer City area and individual TAZs along the I-85 corridor, not in reference to overall results for the entire ICE Study Area.</p> <p>As a result of a public records request, SELC was provided the initial and all interim drafts of the Quantitative ICE Assessment, as well as the final report. Changes between the initial drafts and the final report were the result of changes in assumptions, and not due to data manipulation. A number of assumptions changed between the initial draft of the Quantitative ICE Assessment that used the gravity model approach and the final report. For instance, in the initial draft, it was assumed that the household and employment forecasts included in the Metrolina Regional Travel Demand Model (MRM) represented the No-Build ICE Scenario. However, after interviews with local planners, it was determined that the MRM 2035 household and employment forecasts better represented the Build ICE Scenario. Furthermore, the version of the MRM used in the initial draft included household and employment forecasts for the year 2030. The final report uses a version of the MRM that includes household and employment forecasts for the year 2035. (see Final EIS Section 2.5.5.4).</p> <p>In the initial draft of the Quantitative ICE Assessment, under the Build Scenario, the ICE Study Area in 2035 is estimated to have 4,877 more households and 2,256 more jobs than under the No-Build Scenario. In the final report summarized in the Final EIS, under the Build Scenario, the ICE Study Area is estimated to have 3,700 more households and 300 less jobs than under the No-Build Scenario. This does not mean that if the project is built, the ICE Study Area will have 300 less jobs than today. Rather, the growth of jobs that will occur in the ICE Study Area regardless of the project would be 300 less jobs with the project. Total employment growth in the ICE Study Area between 2005 and 2035 is anticipated to be 91,500 jobs in the No-Build Scenario and 91,200 jobs in the Build Scenario. The difference of 300 jobs between the two scenarios represents an approximately 0.3 percent difference, or approximately no change. In both the initial draft and final reports, the gravity model results show similar patterns and indicate a redistribution of employment in the ICE Study Area from the existing interstate corridors to the new project alignment area.</p> <p>In the ROD (Section 3.5), an update to the Quantitative ICE Assessment is summarized. The update includes an additional subwatershed (Fites Creek-Catawba River) in the ICE Study Area. The updated ICE Assessment is also available for download on the project Web site (www.ncdot.org/projects/gardenparkway). With the inclusion of the Fites Creek-Catawba River subwatershed, it is estimated that</p>

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COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
			the ICE Study Area would have 3,300 more households and 300 less jobs than under the No-Build Scenario, which is consistent with the Quantitative ICE Assessment summarized in the Final EIS.
12	Indirect and Cumulative Effects	Concerns about the reliability of the FEIS were echoed in the press, which brought the above referenced e-mail exchange to the attention of the general public. In response to this concern Turnpike Authority Official Steve DeWitt stated that the impacts study produced for the FEIS could only be used as “a general broad brush.” Mr. DeWitt characterized the 10-15% loss of jobs originally predicted by the study as “raw data”, but failed to explain how such “raw data” resulted in the 1% loss of jobs ultimately published in the FEIS.	See response to Comment 11 in the Southern Environmental Law Center’s letter (letter p026).
13	Indirect and Cumulative Effects	We urge the Transportation Agencies to address the integrity of this study prior to the publication of a Record of Decision (“ROD”), either by commissioning a new study, or by fully explaining the methodology behind the original study, and providing a full and forthright explanation in a Supplemental EIS prior to issuance of a ROD.	The methodology for the quantitative indirect and cumulative effects analysis is explained in detail in the technical memorandum. FHWA and NCTA reviewed and approved the study methodology and approach for the <i>Gaston East-West Connector Quantitative Indirect and Cumulative Effects Assessment</i> (Louis Berger Group, August 2010) and the <i>Revised Final Gaston East-West Connector Quantitative Indirect and Cumulative Effects Assessment</i> (Louis Berger Group, July 2011) and determined the proposed methodology and approach were appropriate and the best available procedure to use. The FHWA and NCTA only used the final versions of the reports in the decision-making process.
14	Indirect and Cumulative Effects	Additional concerns about the reliability of the Indirect and Cumulative Effects analysis for the road arose in April, 2011 with the publication of an economic impact study by John Connaughton. This study, which was financed by the Gaston County Chamber of Commerce, predicted high levels of growth and development directly attributable to the Gaston East-West Connector. The study thus suggested that the FEIS did not account for all the growth and development that will be induced by the construction of the Toll Highway. On April 26, 2011 the Southern Environmental Law Center asked the Turnpike Authority to account for the differences between the Connaughton study and the FEIS. Despite assurances that the Turnpike Authority would review the study and “act accordingly”, no reconciliation of the two studies has been forthcoming.	<p>The lead agencies carefully reviewed and considered the referenced study titled <i>Economic Impact of the Garden Parkway</i> (John E. Connaughton, Ph.D., April 28, 2011) prepared at the request of the Gaston Chamber of Commerce.</p> <p>In a general comparison of Mr. Connaughton’s study with the <i>Quantitative Indirect and Cumulative Effects Assessment</i> prepared by Louis Berger Group for the Gaston East-West Connector, Mr. Connaughton’s study has a different purpose, uses different methodologies and assumptions, and evaluates a different study area. Due to these major differences, the specific results of the two studies cannot be meaningfully compared.</p> <p>The <i>Quantitative Indirect and Cumulative Effects Assessment</i> provides a hard look at the indirect and cumulative effects the proposed project may have on the ICE Study Area environment, including potential effects on households and employment. The methodology and assumptions used, and explained in detail in the report, are broadly accepted for the analysis of transportation projects and are neither arbitrary nor capricious. These methodologies and assumptions were judged by the lead agencies to be appropriate for making well-informed decisions about the project. As explained in the <i>Quantitative Indirect and Cumulative Effects</i></p>

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COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
			<p><i>Assessment:</i></p> <p>“The assessment of potential indirect and cumulative effects (ICE) for the Gaston East-West Connector Project has been conducted in accordance with the eight-step process outlined in the NCDOT/NCDENR <i>Guidance on Indirect and Cumulative Impact Assessment of Transportation Projects in North Carolina</i> (NCDOT, 2001). The eight-step process presented in the NCDOT/NCDENR Guidance was based on the eight-step process developed for National Cooperative Highway Research Program (NCHRP) Report 403: <i>Guidance for Estimating the Indirect Effects of Proposed Transportation Projects</i> (Transportation Research Board, 1998). “</p> <p>Mr. Connaughton’s report was not conducted pursuant to this established guidance, nor was that the purpose of his report. Due to the significant differences in methodologies and purposes of the reports, Mr. Connaughton’s report does not provide information that would aid the transportation agencies in their NEPA process.</p>
15	Indirect and Cumulative Effects	Needless to say, it is a public policy issue of major concern to be using millions of dollars in North Carolina taxpayer and toll-payer funds to construct a toll highway that will result net (sic) job losses in North Carolina. Before proceeding further with this project, we request that these apparent inconsistencies be reconciled by the transportation agencies to provide a complete and reliable picture of indirect and cumulative impacts from the toll highway for consideration by the public and resource agencies.	See response to Comments 11, 13, and 14 in the Southern Environmental Law Center’s letter (letter p026).
16	NEPA Process	As illustrated by these further comments, the concerns about the purpose, viability and impacts of the Gaston East-West Connector continue to mount. We believe that these issues, in addition to the deficiencies in the FEIS outlined in our earlier comments, cannot be adequately resolved in a ROD. To include such information only in a ROD would be to undermine one of the very purposes of NEPA, which is to ensure that the public and agencies are fully involved in the decision making process surrounding major federal actions. 40 C.F.R. § 1502.1. Therefore, if the Transportation Agencies wish to continue to pursue this unwise, unpopular and unfunded project, we request that a supplement to the EIS be prepared to address all concerns expressed to date.	See response to Comments 2 and 7 in the Southern Environmental Law Center’s letter (letter p026).

Appendix C2 – Citizen Comments

Table C2-14: Other Letters

COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
p012, p020, p021, p022, p023, p024		Expressed opinions in support of the Gaston East-West Connector (Garden Parkway).	No detailed response necessary.
p013, p014, p015, p016, p017, p018, p019		Expressed opinions opposing the Gaston East-West Connector (Garden Parkway).	No detailed response necessary.



p012

P.O. Box 1095, Charlotte, NC 28201

March 3, 2011

Mr. Jim Trogdon, PE
Chief Operating Officer
1501 Mail Service Center (Mail)
Raleigh, NC 27699-1501

Re: Garden Parkway Funding

Dear Mr. Trogdon:

While considering the state budget, I respectfully ask you to take every measure to ensure the \$35 million committed to the Garden Parkway Project between Gaston and Mecklenburg counties remains in place.

The Parkway has been a long, ongoing project which is particularly important to the business community. The Transportation Advisory Council has deemed it the top priority roadway project for the Gaston Urban Area Metropolitan Planning Organization. In addition, this project is important for mobility within the greater Charlotte region.

From a jobs perspective, the brutal truth is that we need these construction jobs. Our company's employment is down 35% (almost 400 jobs) due to the "depression" in construction activity since 2007. A project such as the Garden Parkway supports jobs, efficiency, and economic development. We need it now and for our future.

In addition, the Garden Parkway will have a major economic impact to Gaston and Mecklenburg counties and the State of North Carolina by providing direct access to Charlotte-Douglas International Airport and its proposed Intermodal Offloading Facility. Without the parkway access, increased truck traffic from the intermodal terminal will increase truck traffic on Interstate 85 South. This could cause frequent accidents and reduce the capability of I-85 to function as a Strategic Highway Corridor.

The business community believes the Garden Parkway is essential to the economic development of this region. It will open up residential and commercial development, attract new businesses, facilitate existing business expansion, and create jobs for area residents.

Thank you for your consideration.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Ed Weisiger, Jr.'.

Ed Weisiger, Jr.
President

cc: Mr. John Collett

www.carolinacat.com

From: Jeff [jscoggs1@charter.net]
Sent: Thursday, February 10, 2011 9:12 AM
To: gaston@ncturnpike.org
Subject: Communities taking a stand against the toll road

Importance: High

Follow Up Flag: Follow up
Flag Status: Flagged

Whom it may concern:

I recently took up the notion to support the "communities taking a stand against the toll road". I have no direct influence from other supporters and have made this decision based solely on my own assessment.

I do believe a higher priority should be the 321/I-85 interchange. The building of a toll road to bypass Gaston county I can ensure you has personal benefit for many. If not, why is it consider? I strongly believe the thought of the entire project is leaving out the best interest of the Gaston county people. This is why I oppose it. Lets fix the infrastructure from within. When we support the thought of a road to bypass us and then being in our own back yard having to pay the toll, no thank you!

I ask all that is involved in this project to reconsider their support for this project and do the right thing.

I work for Dept. Homeland Security and I have to access this 321/85 interchange for work, it is a mess...considering the economic times we cant afford the toll and the proper fix for the 321/85 interchange, so lets go with priorities and the 321/85 interchange is it.

Sincerely,

Resident of Gaston County – Jeff Scoggins

From: Mandy [acw1968@bellsouth.net]
Sent: Wednesday, February 09, 2011 7:11 PM
To: gaston@ncturnpike.org
Subject: GARDEN PARKWAY

Hi,
I would like to take the time to let you know my feelings on the Garden Parkway. I am totally against it! I have lived in Belmont, NC and the surrounding area my entire life, which is over 40 years.

Why should a parkway be built that isn't going to relieve traffic congestion? There are more important projects that the Garden Parkway money should be used for. For example, I-85 & US 321. I'm surprised people are not killed there every day. If you go I-85 S to get off at US 321, around 4-6 p.m., you won't even get near the exit ramp. You are sitting on the emergency access for at least 1500 feet. Not to mention how bad traffic is coming down US 321 from Lincolnton, around 3:30 p.m. until after rush hour. Even with the improvements that have been made, traffic is crawling up to the I-85 interchange. If that isn't enough, the Wilkinson Blvd. bridges are in terrible need of repair or replacement. It is heartbreaking to imagine homes being taken for the Garden Parkway project. I grew up on South Point Rd. in Belmont, as well as my husband. My mother-in-law still lives in my husband's childhood home. Two years ago, my father-in-law passed away. All she has left are the memories of her and her husband raising their children. The "homeplace" was supposed to be passed to my husband. Eventually, it would go to our son. She doesn't want to leave the only home she's known for close to 50 years. My sister-in-law lives right up the road from my mother-in-law. Her home is also being threatened by this project.

Please reconsider building this wasteful parkway. We have state employee's losing their jobs. It's more important to keep our teachers in the schools instead of a road that is not needed. I, along with everyone else in the surrounding area, can go to Charlotte, NC now within 25 minutes. A project that costs that much isn't worth a 2 minute change. And, I would not pay to get on the road. I would go 10 miles out of my way to keep from paying to travel that road. That is what I already pay taxes for, as well as sales tax, auto insurance and my auto inspection. NC has one of the highest gasoline tax in the country.

Thank you,

Amanda Rhyne

From: keith thompson [kthomp632003@yahoo.com]
Sent: Monday, February 21, 2011 8:58 PM
To: berniey@cityofgastonia.com; gaston@ncturnpike.org
Subject: Toll Road

Are you serious \$35 million ydollars a year for 40 years.....lol If the State and the City wants to spend that much money.....Why dont yall give the teachers a raise and that they deserve and improve the schools that would be a better return on the \$35 million a year.....mmmmm even put some of that money on improving the secondaries road in the state.....Oh I got a good one widening the I-85 mmmmm. The bottom line the residence dont wont the toll road or the higher taxes from it.....Remember Greenville South Carolina toll road.....sure you do.....Stop the Toll Road!!!!!!!!!!

Concern Son

From: G. L. Deese [g-d@rocketmail.com]
Sent: Friday, February 04, 2011 12:02 PM
To: gaston@ncturnpike.org
Subject: Garden Parkway

As current residents of Gaston County and previous residents of Mecklenburg County, we do not see any positive results at this time in constructing the Garden Parkway. With North Carolina's critical budget shortfall, this is one expensive project that can either be permanently cancelled or put on a back burner until the economy can handle the expense.

We would not pay to use the Parkway.

The main constriction of highway we encounter is the narrowing of South I-85 past the weigh station. We avoid 85 during the evening rush hour because traffic **ALWAYS** backs up.

If we have any voice for how our taxes are used by the DOT, we vote for efficiency which is widening South I-85 in the above mentioned area.

Thank you for considering this change.

Sincerely,
G. L. and J. L. Deese

p017

From: bdevoes@carolina.rr.com
Sent: Sunday, February 06, 2011 4:29 PM
To: gaston@ncturnpike.org
Subject: Toll Road

I'm a 62 year old tax paying voter, who is opposed to this Road. As a tax payer it does nothing but take money from my pocket, and remove jobs from this County, do not pass this on to me or the good people of Gaston County!!
Benny Devoes

From: david dickson [jitterjuice2003@yahoo.com]
Sent: Wednesday, February 09, 2011 1:47 PM
To: gaston@ncturnpike.org
Subject: TOLL ROAD TO NO WHERE

STOP THE TOLL ROAD THIS IS THE LARGEST WASTE OF MONEY AND TIME, IN RECENT HISTORY. Gastonia does not want this project and we dont need it. Fix the I85 and 321 interchange, fix the bridges. Dont be ignorant with our money or our lives.

[Never miss an email again!](#)

[Yahoo! Toolbar](#) alerts you the instant new Mail arrives. [Check it out.](#)

p019

18_Ellington_Virginia_Email_Guardian Parkway Toll Road_021711.txt
From: Wise, Beth [ehwise@ncdot.gov]
Sent: Thursday, February 17, 2011 1:53 PM
To: Horne, Sally R
Cc: Harris, Jennifer
Subject: RE: Guardian Parkway Toll Road

Thanks, Sally.

We will record Mrs. Ellington's comments.
Beth

-----Original Message-----

From: Horne, Sally R
Sent: Thursday, February 17, 2011 1:51 PM
To: Wise, Beth
Subject: Guardian Parkway Toll Road

Mrs. Virginia Ellington and her husband of Gaston County would like for this road not to be built. She said it is not a good investment for NC and will cause more problems that it will prevent. She did not want a call back just wanted you to know how she feels about it.

Thank you,
Sally R. Horne
Secretary Conti's Office
919-733-2520

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p020

Honorable Senator/Representative (Name)

Many citizens in Gaston County have tirelessly worked together for ten or more years to ensure that their voices were being heard in Washington and Raleigh to encourage state officials to construct the Gaston East-West Connector (locally called the Garden Parkway). The Gaston Regional Chamber and local Civic Organizations have been engaged with thousands of Gaston County citizens for this purpose. The Gaston Regional Chamber, local Civic Organizations, other supportive organizations and citizens worked effectively with US Representative Sue Myrick and other local, state and national officials to obtain federal funds to help make the Garden Parkway a reality. The Gaston Regional Chamber and local Civic Organizations have also prepared and presented supportive "Resolutions" to the North Carolina Turnpike Authority, State Elected Officials and other State Officials. I would not want to see the time and effort our Gaston County citizen's put into this process to go for naught and; likewise, I do not believe it would be fair or right for the federal and state funds that were dedicated to the Garden Parkway to be removed from Gaston County and be re-allocated to another state project.

Several years ago, I assisted the Gaston Regional Chamber in bringing members of the South Carolina General Assembly and the South Carolina Department of Transportation to Gaston County to explain South Carolina's very successful "Pennies for Progress" roads building program to members of local organizations as well as local and state elected officials. After much deliberation and consultations with the North Carolina Turnpike Authority, North Carolina Department of Transportation and members of the General Assembly, we could not muster enough support to get a "Pennies for Progress" bill introduced in the North Carolina General Assembly.

During these many years of trying to make a good enough case for North Carolina to enact legislation for the "Pennies for Progress," program, supportive citizens of Gaston County didn't give up on the Garden Parkway process. The Gaston Regional Chamber, local Civic Organizations and citizens continually discussed and developed ways and means to ensure supportive citizen's voices were being heard on the state level. With the voices of local citizens and the favorable responses from members of the Turnpike Authority, the Department of Transportation and State Elected Officials, we believed all final favorable study documents had been completed, a final decision was forthcoming and start of construction for the Garden Parkway would commence soon.

Recently, citizens of Gaston County received word that state funding for the Gaston East-West Connector (The Garden Parkway) was in jeopardy. When someone informed me that: "We are losing the Garden Parkway funding," I was speechless.

I respectfully submit to you the following information:

- Traffic studies indicate that there is a real need for additional transportation routes to I-85 and US 29/74. Currently, increased traffic diminishes the ability of I-85 to function as a Strategic Highway Corridor.
- In addition to improving traffic flow, the Garden Parkway will have a major economic impact to Gaston and Mecklenburg Counties and the State of North Carolina by providing economic growth, new jobs and direct access to Charlotte-Douglas International Airport.
- Travel time to Charlotte from Gaston County can be reduced by as much as 30 minutes by traveling on the Parkway instead of the current transportation routes. Currently, this is difficult due to Gaston County having limited crossings over the Catawba River which constrains travel between Gaston County and Charlotte/Mecklenburg County.
- Economic development remains a high priority in Gaston County. I strongly believe that the Garden Parkway will provide access to and from Gaston County that will support the kind economic development Gaston County desires. It will also create housing opportunities which will bring new citizens and jobs to Gaston County and our region.

- I believe greater accessibility between Gaston and Mecklenburg Counties will bring about new opportunities for cultural and educational opportunities.
- The Garden Parkway will drastically improve access between southeastern Gaston County and southern Mecklenburg County by providing a safe and reliable method of transportation.

Finally:

- I know first hand how important it is to construct needed roads because I worked with the Iredell County Board of Commissioners and the citizens of Iredell County during the past few years to help determine a way to relieve congestion on Brawley School Road in Mooresville.
- Why do I mention Brawley School Road? Like Brawley School road, without constructing the Garden Parkway, there is going to be as much or more traffic congestion on highways 274 and 279 South in Southeastern Gaston County at morning and evening rush hours than the citizens experience on Brawley School Road.
- This will be especially true from the intersection of South New Hope Road and Beatty Road, past Stowe Botanical Gardens and south to where highways 274 and 279 merge; just about a mile north of South Carolina highway 49.
- From Rock Hill, South Carolina to South Carolina Highway 49, the South Carolina Highway 274 is a four-lane highway built with "Pennies for Progress." Where will the most traffic congestion occur? Where the South Carolina four-lane Highway 274 crosses South Carolina Highway 49 and enters into a two-lane Highway 274.
- Another major problem to consider will be that, within a few years, construction of economic and residential development that is being planned along North Carolina highways 274 and 279 in the area I pointed out will commence. These developments will "Clog" North Carolina Highways 274 and 279 like never before and especially during rush hour.

I respectfully submit to you the following request:

- I urge you to keep all funding earmarked for the Garden Parkway Project in place and I ask for your voice and vote in support of the Garden Parkway project.

I've tried to make a good case for the construction of the Garden Parkway so as to achieve better economic development for Gaston County and the region and lesson future traffic congestions. I hope and trust you understand and appreciate my positive suggestions as well as my concerns if the Garden Parkway is not built.

Thank you for taking your time to read this information. I hope the citizens of Gaston County can count upon your support to construct the Garden Parkway.

Sincerely,
Jerry G. Campbell



1928 Wexford Court
Gastonia, NC 28052-5800
Phone: 704-616-8518 (Cell)

Mark T. Skillestad
2338 Erika Lane, Gastonia, NC 28056

March 8, 2011

Mr. Eugene A. Conti, Jr.
Chairman
NC Turnpike Authority
1578 Mail Service Center
Raleigh, NC 27699-1578

Dear Mr. Conti:

On behalf of my business and the relationships I share with many of the Small Business owners in Gaston County, I want to express my strong endorsement of the North Carolina Turnpike Authority's plans for the Garden Parkway. As you may recall, this has been a 20 year, ongoing project and the Transportation Advisory Council has deemed it the top priority roadway project for the Gaston Urban Area Metropolitan Planning Organization. The Parkway is a multilane freeway that will provide additional traffic-carrying capacity between Charlotte and Gaston County. The Parkway will ease congestion of large numbers of trucks and cars traveling along the Interstate 85 corridor and provide an additional route in case of an emergency.

The Garden Parkway will have a major economic impact to Gaston and Mecklenburg Counties and the State of North Carolina by providing direct access to Charlotte-Douglas International Airport and its proposed Intermodal Offloading Facility. The business community is concerned that without the Parkway access increased truck traffic from the intermodal terminal would overcrowd I-85 South which could cause frequent accidents and diminish the ability of I-85 to function as a Strategic Highway Corridor.

Economic Development remains a high priority and I believe the Garden Parkway is vital to our economic future in that it will open up residential and commercial development. In fact, based on the number of citizens impacted from the right of way, I conservatively estimate the residential real estate transactions will contribute a minimum of \$107,500,000 in total home sales.¹ My estimate is based on the 344 homes in the right of way and a median home price of

¹ Gaston East-West Connector FEIS, page 2-22.

Mark T. Skillestad
2338 Erika Lane, Gastonia, NC 28056

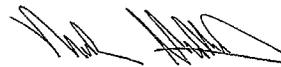
\$125,000.² The estimate also takes into consideration multiple of 2.5 times. In other words, the families relocated from the right of way will likely buy homes from families who, themselves, will relocate to another home.

The Garden Parkway will attract new businesses, facilitate existing business expansion, and create jobs for our citizens. Gaston County has limited crossings over the Catawba River which constrains travel between Gaston County and Charlotte. We believe greater integration with Charlotte will allow us the opportunity to transition our economy from its high reliance of Textiles, to specialized manufacturing, financial services and energy which will provide greater opportunity for our citizens and the overall business climate of the region.

I respectfully ask you to take every measure to ensure that the \$35,000,000 Gap Funding remains earmarked for the Garden Parkway Project. Given the timing of the project throughout the next budget year, I can understand a temporary reduction for the immediate term. However, I am afraid if the money is completely eliminated, then the benefits of this project will be further delayed. Please do not allow this to happen.

Thanks for your leadership and for all you do for the state of North Carolina. Please feel free to contact me if you have any questions or comments. I remain,

Sincerely,



Mark T. Skillestad

² www.trulia.com/home_prices



Post Office Box 10100
Matthews, N.C. 28106-0100
Telephone: (704) 844-3100

April 1, 2011

Governor Beverly Perdue
Office of the Governor
116 West Jones Street
Raleigh, NC 27603

Dear Governor Perdue:

We are writing you concerning the Garden Parkway, we are in favor of, and look forward to, a number of long and short term benefits that it will offer:

I-85 Congestion

- Harris Teeter currently (and our vendor partners) travels this area frequently via I-85 en route to our stores and backhauls in Gastonia, Shelby, Hendersonville, Asheville and Nashville (TN). The congestion we encounter on I-85 is always heavy, but extremely heavy at rush hours. The addition of the Garden Parkway would alleviate a good portion of the congestion that exists now.

Route Efficiency

- In actuality, the Garden Parkway would eliminate 3 miles of travel over our current route of I-485 to I-85, which is 25 miles from the point where the Parkway would begin on I-485 and terminate on I-85 just south of Gastonia, the Parkway is only 22 miles. Fewer miles usually means less fuel consumed and shorter travel times, and it is certainly true in this case.

Fuel Efficiency

- Regardless of which route Harris Teeter (and our vendor partners) chose to use, our miles per gallon could easily improve because less congestion means more time for the engine to run in the optimum RPM range, due to less gear-shifting, fewer accelerations and decelerations. This means less fuel used to travel the same distance. This is obviously good for the environment and lowers our costs.

Other Points to Consider

- Congestion will be improved in other areas as well. It will provide a much-needed crossing over the Catawba River and Lake Wylie. This will reduce the amount of Gaston County traffic that uses York County (SC) roads to get to Charlotte, and will also provide more direct route for York County (SC) citizens to get to I-485 and the Charlotte/Douglas International Airport.

Although this is a toll road, it will require the Gap funding that has been approved by the General Assembly to become a reality. We know you have the very tough job of leading our state during a very challenging economic time. North Carolina is a great state and will recover. Hope you will keep these vital infrastructure investments on track and the Garden Parkway will become a reality.

Sincerely,

Ruddick Corporation

A handwritten signature in black ink that reads "Thomas W. Dickson".

Thomas W. Dickson
Chairman of the Board,
President & CEO

/pp

Sincerely,

Harris Teeter, Inc.

A handwritten signature in black ink that reads "Fred J. Morgenthau, II".

Fred J. Morgenthau, II
President

Rick L Houser

4004 Foxes Trail, Cramerton, NC 28032

704 824-4889 (rickhouser@gmail.com)

March 7, 2011

Mr. Eugene A. Conti, Jr.
Chairman
NC Turnpike Authority
1578 Mail Service Center
Raleigh, NC 27699-1578

Dear Mr. Conti:

On behalf of my business and the relationships I share with many of the Small Business owners in Gaston County, I want to express my strong endorsement of the North Carolina Turnpike Authority's plans for the Garden Parkway. As you may recall, this has been a 20 year, ongoing project and the Transportation Advisory Council has deemed it the top priority roadway project for the Gaston Urban Area Metropolitan Planning Organization. The Parkway is a multilane freeway that will provide additional traffic-carrying capacity between Charlotte and Gaston County. The Parkway will ease congestion of large numbers of trucks and cars traveling along the Interstate 85 corridor and provide an additional route in case of an emergency.

The Garden Parkway will have a major economic impact to Gaston and Mecklenburg Counties and the State of North Carolina by providing direct access to Charlotte-Douglas International Airport and its proposed Intermodal Offloading Facility. The business community is concerned that without the Parkway access increased truck traffic from the intermodal terminal would overcrowd I-85 South which could cause frequent accidents and diminish the ability of I-85 to function as a Strategic Highway Corridor.

Economic Development remains a high priority and I believe the Garden Parkway is vital to our economic future in that it will open up residential and commercial development. In fact, based on the number of citizens impacted from the right of way, I conservatively estimate the residential real estate transactions will contribute a minimum of \$107,500,000 in total home sales.¹ My estimate is based on the 344 homes in the right of way and a median home price of

¹ Gaston East-West Connector FEIS, page 2-22.

Rick L Houser

4004 Foxes Trail, Cramerton, NC 28032

704 824-4889 (rickhouser@gmail.com)

\$125,000.² The estimate also takes into consideration multiple of 2.5 times. In other words, the families relocated from the right of way will likely buy homes from families who, themselves, will relocate to another home.

The Garden Parkway will attract new businesses, facilitate existing business expansion, and create jobs for our citizens. Gaston County has limited crossings over the Catawba River which constrains travel between Gaston County and Charlotte. We believe greater integration with Charlotte will allow us the opportunity to transition our economy from its high reliance of Textiles, to specialized manufacturing, financial services and energy which will provide greater opportunity for our citizens and the overall business climate of the region.

I respectfully ask you to take every measure to ensure that the \$35,000,000 Gap Funding remains earmarked for the Garden Parkway Project. Given the timing of the project throughout the next budget year, I can understand a temporary reduction for the immediate term. However, I am afraid if the money is completely eliminated, then this project might be dead. Please do not allow this to happen.

Thanks for your leadership and for all you do for the state of North Carolina. Please feel free to contact me if you have any questions or comments. I remain,

Sincerely,



Rick L. Houser

² www.trulia.com/home_prices



GASTON ASSOCIATION OF REALTORS®, INC.

2923 AUDREY DRIVE GASTONIA, N. C. 28054

PHONE: 704-867-4826 FAX: 704-867-1499

EMAIL: info@gastonrealtors.com WEB SITE: www.gastonrealtors.com



March 31, 2011

Governor Beverly Perdue
Office of the Governor
20301 Mail Service Center
Raleigh, NC 27699-0301

Dear Governor Perdue:

The Gaston Association of REALTORS® strongly supports the North Carolina Turnpike authority's plans for the Garden Parkway in Gaston and Mecklenburg Counties. This project will drastically improve access between southern Gaston County and Mecklenburg County by providing a safe and reliable method of transportation.

Traffic studies indicate that there is a need for an alternative transportation route to I-85 and US 29/74. Currently, increased traffic diminishes the ability of I-85 to function as a Strategic Highway Corridor. In addition to improving traffic flow, the Garden Parkway will have a major economic impact to Gaston and Mecklenburg Counties and the State of North Carolina by providing direct access to Charlotte-Douglas International Airport.

Additionally, Economic and Residential Development remains a high priority of the Gaston Association of REALTORS®. We strongly believe that the Garden Parkway will support this growth by opening up access for development which will create jobs for our current citizens and attract new citizens to our region. Currently, this is difficult due to the fact that Gaston County has limited crossings over the Catawba River which constrains travel between Gaston County and Charlotte. Travel time to Charlotte from Gaston County could be reduced by as much as 30 minutes by traveling on the Parkway instead of current transportation routes. We believe greater accessibility to Charlotte will not only provide us with greater opportunities for our citizens, but will positively affect the development of the region.

While we are sensitive to the adverse affect(s) this project has on some property owners, our pledge of support is intended for the greater good of all citizens in Gaston County.

Thank you for your consideration regarding this matter.

Cordially yours,

A handwritten signature in cursive script that reads 'Krista Sands'.

Krista Sands
2011 President, Gaston Association of REALTORS®

APPENDIX C3

LOCAL GOVERNMENT RESOLUTIONS

Document Number	Agency/Organization	Date	Page Number
g001	Gaston County Board of Commissioners	02/03/11	C3-1
g002	Gaston Regional Chamber	02/10/11	C3-2
g003	Town of Cramerton	03/04/11	C3-3
g004	Montcross Area Chamber of Commerce	03/08/11	C3-4
g005	Montcross Area Chamber of Commerce	03/08/11	C3-5
g006	Montcross Area Chamber of Commerce	03/09/11	C3-6
g007	Charlotte Douglas International Airport	03/14/11	C3-7
g008	Gaston Regional Chamber	03/16/11	C3-8
g009	Gaston Urban Area Metropolitan Planning Organization – Transportation Planning	04/11/11	C3-9
g010	Gaston County Board of Commissioners	04/29/11	C3-11
g011	Gaston Together	04/19/11	C3-13

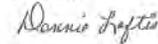
g001

Governor Bev Perdue
Office of the Governor
February 3, 2011
Page 2

support the Garden Parkway Project. We started this project as the first toll road in North Carolina with the belief that it could serve as a model to other counties for reducing the State cost of building major new roads. With all due respect, we implore you as Governor, the Gaston Legislative Delegation, and the Chairman of the N.C. Turnpike Authority/Secretary of the N.C. Department of Transportation to take every measure to ensure that the \$35M remains earmarked for the Garden Parkway Project in order for Gaston County to move forward to a more progressive future.

Thanking all of you in advance for your support, I invite any questions or comments you may have to my cell phone at 704-747-0340.

Sincerely,



Donnie Loftis, Chairman
Gaston County Board of Commissioners

cc: The Honorable Phil Berger, North Carolina GA Pro Tempore of the Senate
The Honorable Thom Tillis, North Carolina GA Speaker of the House
The Gaston Legislative Delegation
Mr. Eugene A. Conti, Jr., NCTA Chairman & Members and NCDOT Secretary & Members
Gaston County Board of Commissioners (via e-mail)
Mr. Jan Winters, County Manager (via e-mail)
Mr. John Kimbrell, Gaston Regional Chamber President/CEO

Gaston County
Board of Commissioners
www.co.gaston.nc.us



Donnie Loftis
Chair
Gastonia Township

Tracy L. Philbeck
Vice-Chair
Dallas Township

Chad Brown
Riverbend Township

Joe D. Carpenter
Crowders Mtn. Township

Allan R. Fraley
Cherryville Township

Tom Keigher
Gastonia Township

Mickey Price
South Point Township

Jan Winters
County Manager

Charles L. Moore
County Attorney

Martha M. Jordan
Clerk to the Board

Mission Statement
Gaston County seeks to be among the finest counties in North Carolina. It will provide effective, efficient and affordable services leading to a safe, secure and healthy community, an environment for economic growth, and promote a favorable quality of life.

GASTON COUNTY, NORTH CAROLINA

February 3, 2011

Governor Bev Perdue
Office of the Governor
20301 Mail Service Center
Raleigh, NC 27699-0301

Dear Governor Perdue:

It has been called to our attention this morning that there are possible rumblings in the Senate as to the need for the \$35M earmarked for the Garden Parkway in Gaston County. As you may recall, this has been a long, ongoing project and the first toll road to be proposed in North Carolina. The Parkway is a multilane freeway that will provide additional traffic-carrying capacity between Charlotte and Gastonia and points south. It will ease congestion of large numbers of trucks and cars traveling along the Interstate 85 corridor and provide an additional route in case of an emergency.

Most important, the Parkway will provide direct access to Charlotte-Douglas International Airport and the proposed Intermodal Offloading Facility which would lead to a major economic impact to Gaston and Mecklenburg Counties as well as the State of North Carolina. We are very concerned that without the Parkway the increased truck traffic from the intermodal terminal would turn parts of I-85 into a parking lot and widening I-85 south would actually be more expensive than the Parkway. Gaston County has identified the Garden Parkway project as a top priority that will provide a real solution to regional transportation needs and enable a quicker route to Charlotte-Douglas Airport.

Gaston's 2011 top priorities are economic development and education which go hand-in-hand. The Garden Parkway is vital to our economic future in that it will open up residential and commercial development, attract new businesses, facilitate existing business expansion, create jobs for our citizens and greatly help us in meeting the needs of our schools. Gaston County's economy, due to the impact of free trade agreements on textiles and the barrier of the Catawba River limiting our connection with Charlotte, has lagged behind other counties in the greater metro area. We believe greater integration with Charlotte will allow us to transition away from textiles and improve our high unemployment. And, at this particular time when the project is ready to turn dirt and with the leveraging from road tolls, no other investment in North Carolina could so quickly generate as many jobs – especially those jobs in the hard hit construction sector.

The Gaston County Commission is doing everything in its power to assist our economy including increasing funding for education while other counties are cutting theirs, developing a workforce development program to help our residents who lack the education to be competitive for new jobs, and building a 400-acre County owned industrial park with full infrastructure (we also own an office park and have already started on a second industrial park). We are doing things no other county in North Carolina is doing, but we can't succeed without better access into Charlotte.

The Gaston County Commission and the Gaston Regional Chamber continues to

128 West Main Avenue, PO Box 1578, Gastonia, NC 28053-1578
Phone: 704-866-3198 - Fax: 704-866-3482
E-mail: mjordan@co.gaston.nc.us

128 West Main Avenue, PO Box 1578, Gastonia, NC 28053-1578
Phone: 704-866-3198 - Fax: 704-866-3482
E-mail: mjordan@co.gaston.nc.us



February 10, 2011

Governor Beverly Perdue
Office of the Governor
20301 Mail Service Center
Raleigh, NC 27699-0301

Dear Governor Perdue:

On behalf of our 800 members the Gaston Regional Chamber of Commerce is continuing our strong support of the Garden Parkway Project. This project remains the number one transportation priority as identified by the Transportation Advisory Council and we respectfully ask of you to take every measure to ensure that the \$35M gap funding remain earmarked for the Garden Parkway Project.

The Garden Parkway will have a major economic impact to Gaston and Mecklenburg Counties and the State of North Carolina by providing direct access to Charlotte-Douglas International Airport and its proposed Intermodal Offloading Facility. The business community is concerned that without the Parkway access increased truck traffic from the intermodal terminal would overcrowd I-85 South which could cause frequent accidents and diminish the ability of I-85 to function as a Strategic Highway Corridor.

Economic Development remains a high priority of the Gaston Regional Chamber of Commerce and we believe that the Garden Parkway is vital to our economic future in that it will open up residential and commercial development, attract new businesses, facilitate existing business expansion, and creating jobs for our citizens. Gaston County has limited crossings over the Catawba River which constrains travel between Gaston County and Charlotte. We believe greater integration with Charlotte will allow us the opportunity to transition our economy which will provide greater opportunity for our citizens and the overall business climate of the region.

Thanks for your leadership and for all you do for the state of North Carolina.
Cordially yours,

Rusty Harris
2011 Chairman of the Board

John Kimbrell
President/CEO

- Cc: The Honorable Phil Berger, North Carolina GA Pro Tempore of the Senate
- The Honorable Thom Tillis, North Carolina GA Speaker of the House
- The Gaston County Legislative Delegation
- The Mecklenburg County Delegation
- Mr. Eugene A. Conti, Jr., NCTA Chairman
- Mr. Jerry Orr, Aviation Director
- Mr. David Iovner, Executive Director, NC Turnpike Authority
- Gaston County Board of Commissioners (via e-mail)
- Mr. Jan Winters, County Manager (via e-mail)
- Mr. Bob Morgan, President/CEO, Charlotte Chamber (via e-mail)



RESOLUTION OF CONTINUED SUPPORT FOR THE NORTH CAROLINA'S TURNPIKE AUTHORITY'S GARDEN PARKWAY

WHEREAS, the Gaston Chamber of Commerce (DBA Gaston Regional Chamber) and the Economic Development Division of the Chamber exists to serve our more than 800 business members by providing networking opportunities, serving as their pro-business advocacy voice, promoting education/workforce development and economic development opportunities for all of Gaston County;

WHEREAS, the Transportation Advisory Council has deemed the Garden Parkway to be the top priority roadway project for the Gaston Urban Area Metropolitan Planning Organization region; and

WHEREAS, limited crossings of the Catawba River are constraining travel between Gaston and Mecklenburg Counties and there are only four crossings of the river, with none of them located in the southern half of Gaston County; and

WHEREAS, a review of growth data indicates a 24 percent growth in residents from 2000 to 2008 and a doubling of regional population by 2030; and

WHEREAS, the projected growth in southern Gaston County and western Mecklenburg County will continue to increase demands for accessibility and connectivity between the two counties; and

WHEREAS, south of I-85 in Gaston County, a lack of connecting east-west roadways makes travel circuitous and limits mobility for travel in southern Gaston County; and

WHEREAS, continued viability of business and industry relies on efficient movement of people, goods, and services; and

WHEREAS, between 1990 and 2000, southeastern Gaston County was the fastest growing part of the county and planned growth in southern Gaston County will result in an increased need for east-west mobility; and

WHEREAS, congestion and frequent accidents on I-85 inhibit regional travel and diminish the ability of I-85 to function as a Strategic Highway Corridor; and

WHEREAS, our organization is sensitive to the adverse affect (s) this project has on some property owners, our pledge of support is intended for the greater good of all citizens in Gaston County;

NOW THEREFORE BE IT RESOLVED, that the Board of Directors of the Gaston Chamber of Commerce endorses the continued support of the North Carolina Turnpike Authority's plans for the Garden Parkway.

Rusty Harris, Chair of the Board

Adopted this 10th Day of February, 2011



March 4, 2011

Dear Mr. Hank Graham:

At the Town of Cramerton Board of Commissioners meeting on Tuesday, March 1, 2011, the Cramerton Board of Commissioners unanimously approved a Resolution Supporting the Proposed Gaston East-West Connector Project, otherwise known as the Garden Parkway.

The Board of Commissioners directed me to send the attached Resolution for your review. If you have any questions on this position or would like more information, please contact me at Town Hall, 704-824-4337.

Sincerely,

Michael C. Peoples
Town Manager

- CC: Honorable Town of Cramerton Mayor and Board of Commissioners
- Honorable Governor Beverly Perdue
- Honorable Senator Kathy Harrington
- Honorable Senator James Forrester
- Honorable Representative John Torbett
- Honorable Representative Kelly Hastings
- Mr. Donny Hicks, Gaston County Economic Development Commission
- Honorable Judge Robert A. Collier, Jr.
- Mr. Mike Holder, Division 12 Engineer, NCDOT
- Chairman Eugene Conti, NCDOT
- Mr. Bob Clay, NC Turnpike Authority
- Gaston County Commissioners
- Mr. Ted Hall, Montcross Chamber of Commerce
- Ms. Julie Roper, Gaston Chamber of Commerce
- Mr. Duane McAllister, Gaston County Economic Development Commission
- Mr. Rusty Harris, Gaston Regional Chamber
- Mr. Tim Gause, Gaston Regional Chamber
- Honorable City of Belmont Mayor and City Manager
- Honorable City of Bessemer City and City Manager
- Honorable City of Gastonia Jennie Stultz and City Manager
- Honorable Town of McAdenville and Town Manager
- Honorable City of Charlotte Mayor and City Manager

THE SECOND TOWN OF CRAMERTON RESOLUTION SUPPORTING THE PROPOSED GASTON EAST-WEST CONNECTOR "GARDEN PARKWAY"

WHEREAS, the Town of Cramerton Board of Commissioners unanimously voted on Thursday, August 21, 2008 to support the most Northern proposed route for the Gaston East-West Connector, otherwise known as the "Garden Parkway"; and

WHEREAS, the Town of Cramerton Board of Commissioners would like to again show support for the construction of the proposed route for the Gaston East-West Connector, otherwise known as the "Garden Parkway"; and

WHEREAS, the proposed Gaston East-West Connector or "Garden Parkway" will significantly impact the Town of Cramerton and Gaston County by reducing traffic on Interstate 85 and opening a third Catawba River crossing that will allow for expedient access to the Charlotte Metropolitan Area, especially the Charlotte-Douglas International Airport; and

WHEREAS, the Gaston East-West Connector or "Garden Parkway" intersection with South New Hope Road will create an economic development corridor unmatched for the Town of Cramerton due to the available developable property located in Cramerton's Sphere of Influence Area; and

WHEREAS, the Town of Cramerton has the ability to provide the necessary physical infrastructure to the South New Hope Road and Gaston East-West Connector or "Garden Parkway" intersection and the proposed route will dissect more vacant and available property through Cramerton's Sphere of Influence Area, thus reducing the negative effect to existing homeowners in the area; and

NOW THEREFORE, BE IT RESOLVED that the Town of Cramerton Board of Commissioners have recognized the benefits of the Gaston East-West Connector or "Garden Parkway" and wishes to restate their position of support to the Governor of North Carolina, the North Carolina General Assembly, the North Carolina Turnpike Authority, the North Carolina Department of Transportation, Gaston Urban Area Metropolitan Planning Organization, Gaston County, Gaston County Economic Development Commission, Montcross Area Chamber of Commerce, Gaston Regional Chamber of Commerce, Centralina Council of Governments, and surrounding municipalities, for this extremely important transportation project.

BE IT FURTHER RESOLVED, that the Board of Commissioners of the Town of Cramerton unanimously voted on Tuesday, March 1, 2011 to fully support the Gaston East-West Connector or "Garden Parkway".

Adopted this the 1st day of March 2011

Ronald E. Worley, Mayor

3-1-2011
(Date)

(SEAL)

ATTEST

Wilene L. Cunningham, Town Clerk

Montcross Area Chamber Board affirms support for Garden Parkway

The Board of Directors of the Montcross Area Chamber unanimously adopted its second resolution in support of the Gaston East-West Connector (Garden Parkway) at its meeting on March 8, 2011. The board previously adopted a resolution in April 2009 when the Environmental Impact Study on the highway was being prepared. The most recent resolution spelled out why the Chamber board thinks the Garden Parkway, linking southern Gaston County to Charlotte-Douglas International Airport and a vast intermodal shipping facility being built there, is essential to future economic development and job creation in Gaston County. Projected rapid growth in southeastern Gaston County was cited as another reason the highway is needed to provide better east-west connectivity between Gaston and Mecklenburg County. South Point Township and River Bend Township in eastern Gaston are growing at a rate far faster than the county as a whole. The Chamber's resolution was sent with a letter to North Carolina Governor Beverly Perdue, with copies going to members of the local legislative delegation and other key members of the General Assembly. The full text of the resolution is presented here.

RESOLUTION OF CONTINUED SUPPORT FOR THE GASTON EAST-WEST CONNECTOR (GARDEN PARKWAY)

WHEREAS, the Montcross Area Chamber exists to work for the success of its more than 300 business members, serving as their pro-business advocacy voice, promoting education/workforce development and economic development opportunities in the communities of the Montcross Area and throughout all of Gaston County; and

WHEREAS, the Transportation Advisory Council has deemed the Gaston East-West Connector (Garden Parkway) to be the top priority roadway project for the Gaston Urban Area Metropolitan Planning Organization region; and

WHEREAS, the Montcross Area Chamber Board of Directors on April 14, 2009, adopted a resolution endorsing the Environmental Impact Study for the Gaston East-West Connector (Garden Parkway); and

WHEREAS, limited crossings of the Catawba River are constraining travel between Gaston and Mecklenburg Counties, with only four crossings of the river and none of them located in the southern half of Gaston County; and

WHEREAS, south of I-85 in Gaston County, a lack of connecting east-west roadways makes travel circuitous and limits mobility for travel in southern Gaston County; and

WHEREAS, continued viability of business and industry relies on efficient movement of people, goods, and services; and

WHEREAS, a review of growth data indicates a 24 percent growth in residents from 2000 to 2010 and a doubling of regional population by 2030; and

WHEREAS, between 2000 and 2010, southeastern Gaston County was the fastest growing part of the county, and planned growth in southern Gaston County will result in an increased need for east-west mobility; and

WHEREAS, the projected growth in southern Gaston County and western Mecklenburg County will continue to increase demands for accessibility and connectivity between the two counties; and

WHEREAS, congestion and frequent accidents on I-85 inhibit regional travel and diminish the ability of I-85 to function as a Strategic Highway Corridor; and

WHEREAS, our organization is sensitive to the adverse affect(s) this project has on some property owners, our pledge of support is intended for the greater good of all citizens in Gaston County;

NOW THEREFORE BE IT RESOLVED, that the Board of Directors of the Montcross Area Chamber of Commerce affirms its continued support for construction of the Gaston East-West Connector (Garden Parkway).

Julie Roper

Julie Roper, Chair Montcross Area Chamber Board of Directors



**RESOLUTION OF CONTINUED SUPPORT
FOR THE GASTON EAST-WEST CONNECTOR (GARDEN PARKWAY)**

WHEREAS, the Montcross Area Chamber exists to work for the success of its more than 300 business members, serving as their pro-business advocacy voice, promoting education/workforce development and economic development opportunities in the communities of the Montcross Area and throughout all of Gaston County; and

WHEREAS, the Transportation Advisory Council has deemed the Gaston East-West Connector (Garden Parkway) to be the top priority roadway project for the Gaston Urban Area Metropolitan Planning Organization region; and

WHEREAS, the Montcross Area Chamber Board of Directors on April 14, 2009, adopted a resolution endorsing the Environmental Impact Study for the Gaston East-West Connector (Garden Parkway); and

WHEREAS, limited crossings of the Catawba River are constraining travel between Gaston and Mecklenburg Counties, with only four crossings of the river and none of them located in the southern half of Gaston County; and

WHEREAS, south of I-85 in Gaston County, a lack of connecting east-west roadways makes travel circuitous and limits mobility for travel in southern Gaston County; and

WHEREAS, continued viability of business and industry relies on efficient movement of people, goods, and services; and

WHEREAS, a review of growth data indicates a 24 percent growth in residents from 2000 to 2010 and a doubling of regional population by 2030; and

WHEREAS, between 2000 and 2010, southeastern Gaston County was the fastest growing part of the county, and planned growth in southern Gaston County will result in an increased need for east-west mobility; and

WHEREAS, the projected growth in southern Gaston County and western Mecklenburg County will continue to increase demands for accessibility and connectivity between the two counties; and

WHEREAS, congestion and frequent accidents on I-85 inhibit regional travel and diminish the ability of I-85 to function as a Strategic Highway Corridor; and

WHEREAS, our organization is sensitive to the adverse affect (s) this project has on some property owners, our pledge of support is intended for the greater good of all citizens in Gaston County;

NOW THEREFORE BE IT RESOLVED, that the Board of Directors of the Montcross Area Chamber of Commerce affirms its continued support for construction of the Gaston East-West Connector (Garden Parkway).

A handwritten signature in black ink, appearing to read "Julie Roper".

Julie Roper, Chair
Montcross Area Chamber Board of Directors

Adopted this 8th Day of March, 2011

g006



PO Box 368, Belmont, NC 28012

www.MontcrossAreaChamber.com

704-825-5307; Fax 704-825-5550

March 9, 2011

Governor Beverly Perdue
Office of the Governor
20301 Mall Service Center
Raleigh, NC 27699-0301

Dear Governor Perdue:

The Montcross Area Chamber of Commerce Board of Directors, representing more than 320 member businesses in eastern Gaston County, reaffirmed its wholehearted support for the Gaston East-West Connector (Garden Parkway) by unanimously adopting the enclosed resolution on March 8, 2011. This project remains the number one transportation priority as identified by the Transportation Advisory Council, and we respectfully ask you to take every measure to ensure that the \$35 million gap funding remains earmarked for the Garden Parkway Project.

The Garden Parkway will have a major economic impact on Gaston and Mecklenburg Counties and the State of North Carolina by providing direct access to Charlotte-Douglas International Airport and its proposed Intermodal Offloading Facility. The business community is concerned that without the Parkway access, increased truck traffic from the intermodal terminal would overcrowd I-85 South, which could cause frequent accidents and diminish the ability of I-85 to function as a Strategic Highway Corridor.

The Garden Parkway is vital to the economic future of Gaston County. It will open up residential and commercial development, attract new businesses, facilitate existing business expansion, and create jobs for our citizens. Gaston County has limited crossings over the Catawba River, which constrains travel between Gaston County and Charlotte. Greater integration with Charlotte will allow us to transition our economy, which will enhance opportunities for our citizens and the overall business climate of the region.

Thank you for your leadership and for all you do for the state of North Carolina.

Sincerely,

Handwritten signature of Julie Roper in black ink.

Julie Roper
2011 Chairman of the Board

Handwritten signature of Ted Hall in black ink.

Ted Hall
President

Cc: The Honorable Phil Berger, North Carolina GA Pro Tempore of the Senate
The Honorable Thorn Tillis, North Carolina GA Speaker of the House
The Gaston County Legislative Delegation
Mr. Eugene A. Conti, Jr., NCTA Chairman
Mr. Jerry Orr, Charlotte-Douglas International Airport
Mr. David Joyner, Executive Director, NC Turnpike Authority
Mayors of Belmont, Cramerton, Lowell, McAdenville, Mount Holly and Stanley (via e-mail)
Gaston County Board of Commissioners (via e-mail)
Mr. Jan Winters, Gaston County Manager (via e-mail)
Mr. Bob Morgan, President/CEO, Charlotte Chamber (via e-mail)



g007

Senator Phil Berger
President Pro Tempore, North Carolina Senate
16 West Jones Street, Room 2008
Raleigh, North Carolina 27601

Dear Senator Berger,

In light of recent news reports related to the proposed Garden Parkway, I want to offer the support of the Charlotte Douglas International Airport for the project. The Garden Parkway would provide a much needed vehicular corridor through southern Gaston County and would link two interstate highways to provide an alternative for travelers accessing I-85 from the south and west of the region.

This addition to our regional road network would be particularly advantageous for the Airport and the intermodal facility that will be built at the Airport. The entrance to the intermodal yard will be located on West Boulevard, which intersects the proposed route of the Garden Parkway at the I-485 interchange that is currently under construction. When operational, the intermodal facility will have the capacity to generate 250,000 lifts annually, which translates into 685 trucks a day accessing the facility. These trucks will be traveling on the interstate road network to and from locations throughout the region. Having the Garden Parkway as an option for trucks heading west to I-85 would provide a redundant route for points to the west. With the current traffic volumes on I-85, and the projected growth on that road, it will be very important to have an alternative route for the trucks accessing the facility.

It is our hope that the NC Turnpike Authority is successful in their quest to construct this road, as we see this project as an integral part of the transportation infrastructure for this region. The overall benefit to the community makes this a worthwhile endeavor. If the Airport can assist you in moving this project forward, please do not hesitate to ask.

Sincerely,



T.J. Orr
Aviation Director

cc: Jack Christine, A.A.E.

g008



RESOLUTION OF CONTINUED SUPPORT FOR THE NORTH CAROLINA'S TURNPIKE
AUTHORITY'S GARDEN PARKWAY

WHEREAS, the Gaston Chamber of Commerce (DBA Gaston Regional Chamber) and the Economic Development Division of the Chamber exists to serve our more than 800 business members by providing networking opportunities, serving as their pro-business advocacy voice, promoting education/workforce development and economic development opportunities for all of Gaston County;

WHEREAS, the Transportation Advisory Council has deemed the Garden Parkway to be the top priority roadway project for the Gaston Urban Area Metropolitan Planning Organization region; and

WHEREAS, limited crossings of the Catawba River are constraining travel between Gaston and Mecklenburg Counties and there are only four crossings of the river, with none of them located in the southern half of Gaston County; and

WHEREAS, a review of growth data indicates a 24 percent growth in residents from 2000 to 2008 and a doubling of regional population by 2030; and

WHEREAS, the projected growth in southern Gaston County and western Mecklenburg County will continue to increase demands for accessibility and connectivity between the two counties; and

WHEREAS, south of I-85 in Gaston County, a lack of connecting east-west roadways makes travel circuitous and limits mobility for travel in southern Gaston County; and

WHEREAS, continued viability of business and industry relies on efficient movement of people, goods, and services; and

WHEREAS, between 1990 and 2000, southeastern Gaston County was the fastest growing part of the county and planned growth in southern Gaston County will result in an increased need for east-west mobility; and

WHEREAS, congestion and frequent accidents on I-85 inhibit regional travel and diminish the ability of I-85 to function as a Strategic Highway Corridor; and

WHEREAS, our organization is sensitive to the adverse affect (s) this project has on some property owners, our pledge of support is intended for the greater good of all citizens in Gaston County;

NOW THEREFORE BE IT RESOLVED, that the Board of Directors of the Gaston Chamber of Commerce endorses the continued support of the North Carolina Turnpike Authority's plans for the Garden Parkway.

A handwritten signature in cursive script, appearing to read "Rusty Harris".

Rusty Harris, Chair of the Board

Adopted this 16th Day of March, 2011

52313 g009

Gaston Urban Area
Metropolitan Planning Organization
Transportation Planning

RECEIVED

APR 11 2011

N.C. DEPARTMENT OF TRANSPORTATION
OFFICE OF THE SECRETARY

Mailing Address:
PO Box 1748
Gastonia, North Carolina 28053

Physical Address:
150 South York Street
Gastonia, North Carolina 28052

Tel: (704) 866.6837
Fax: (704) 869.1960

www.gastonmpo.org

Secretary Eugene Conti
Secretary of Transportation, NCDOT
1501 Mail Service Center
Raleigh, NC 27699-1501

RE: Endorsement of the Final Environmental Impact Statement (FEIS) for the Garden Parkway

Dear Honorable Secretary Conti:

I am writing to inform you of the recent actions approved by the Transportation Advisory Committee (TAC) for the Gaston Urban Area MPO. At its March 22, 2011 meeting, the TAC endorsed a resolution (see attached) supporting the North Carolina Turnpike Authority (NCTA) Final Environmental Impact Statement.

The Garden Parkway has been ranked as the top priority project for the Gaston Urban Area for numerous reasons. Notwithstanding, Gaston County is designated an eight hour ozone non-attainment area and the Garden Parkway will not only improve air quality and emissions conditions, but relieve congestion as well.

Currently, Gaston County is lacking east-west connecting roadways, which limits mobility and travel in southern Gaston County. The Garden Parkway will be a major contributor to the Charlotte Intermodal Transportation Facility. This new freight facility to be located at the Charlotte Douglas International Airport will be an invaluable economic asset not only to the region, but to the entire State of North Carolina.

Your consideration and cooperation in this endeavor is greatly appreciated.

Sincerely,

Joe D. Carpenter
Transportation Advisory Committee, Chair

Cc: James H. Graham, Principal Transportation Planner
Jim Palenick, City Manager
Flip Bombardier, Assistant City Manager
Michelle Nance, Development Services Manager

Serving
Belmont
Bessemer City
Cramerton
Dallas
Gaston County
Gastonia
Lowell
McAdenville
Mount Holly
Reno
Spencer Mountain
Stanley

**RESOLUTION ENDORSING THE NORTH CAROLINA
TURNPIKE AUTHORITY'S FINAL ENVIRONMENTAL IMPACT
STATEMENT FOR THE GARDEN PARKWAY AS CONDUCTED
BY THE GASTON URBAN AREA MPO**

WHEREAS, the TAC has deemed the Garden Parkway to be the top priority roadway project for the Gaston Urban Area Metropolitan Planning Organization region; and

WHEREAS, in 2005, Gaston County was designated as a 8-hour ozone non-attainment area where this project will improve air quality modeling and emission conditions for the metropolitan region; and

WHEREAS, limited crossings of the Catawba River are constraining travel between Gaston and Mecklenburg Counties and there are only four crossings of the river, with none of them located in the southern half of Gaston County; and

WHEREAS, a review of the tax parcel data shows that from 2000 to 2008, the number of residences in southern Gaston County and western Mecklenburg County has increased approximately 24 percent; and

WHEREAS, the projected growth in southern Gaston County and western Mecklenburg County will continue to increase demands for accessibility and connectivity between the two counties; and

WHEREAS, south of I-85 in Gaston County, a lack of connecting east-west roadways makes travel circuitous and limits mobility for travel in southern Gaston County; and

WHEREAS, currently there are no continuous east-west routes in southern Gaston County; and

WHEREAS, between 1990 and 2000, southeastern Gaston County was the fastest growing part of the county and planned growth in southern Gaston County will result in an increased need for east-west mobility; and

WHEREAS, the Gaston Urban Area Metropolitan Planning Organization (GUAMPO) and the Mecklenburg-Union MPO (MUMPO) show in their plans a new location roadway running through southern Gaston County and connecting over the Catawba River to Mecklenburg County; and

WHEREAS, the Garden Parkway is a Strategic Highway Corridor (SHC); and

WHEREAS, the Garden Parkway is designated as a new freeway facility within the Strategic Highway Corridors Vision Plan; and

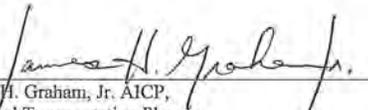
NOW THEREFORE BE IT RESOLVED, that the Transportation Advisory Committee of the Gaston Urban Area Metropolitan Planning Organization endorses the Final Environmental Impact Statement conducted by the North Carolina Turnpike Authority.

g009



Joe D. Carpenter, Chair
Transportation Advisory Committee
Gaston Urban Area Metropolitan Planning Organization

ATTESTED:



James H. Graham, Jr. AICP,
Principal Transportation Planner
Gaston Urban Area Metropolitan Planning Organization

Resolution adopted upon a motion of ^{Houston}~~Helms~~, seconded by ^{Peay}~~Toomey~~, by a vote of the majority of the Gaston Urban Area Transportation Advisory Committee.

North Carolina
Gaston County

I, **Cathleen L. Roberts**, a Notary Public for said County and State, do hereby certify that **Joe D. Carpenter** personally appeared before me on this the 22nd day of March, 2011, and acknowledge the due execution of the foregoing instrument.

Witness my hand and official seal, this the 22nd day of March, 2011.



Cathleen L. Roberts
Notary Public



1183415

g010



g010

Gaston County Board of Commissioners www.co.gaston.nc.us



- Donnie Loftis, Chairman, Gastonia Township
- Tracy L. Philbeck, Vice-Chair, Dallas Township
- Chad Brown, Riverbend Township
- Joe D. Carpenter, Crowders Mtn. Township
- Allen R. Fraley, Cherryville Township
- Tom Keigher, Gastonia Township
- Mickey Price, South Point Township
- Jan Winters, County Manager
- Charles L. Moore, County Attorney
- Martha M. Jordan, Clerk to the Board

Mission Statement: Gaston County seeks to be among the finest counties in North Carolina. It will provide effective, efficient and affordable services leading to a safe, secure and healthy community, an environment for economic growth, and promote a favorable quality of life.

GASTON COUNTY, NORTH CAROLINA

April 29, 2011

Governor Bev Perdue, Office of the Governor, 20301 Mail Service Center, Raleigh, NC 27699-0301

Dear Governor Perdue:

The Gaston County Board of Commissioners (BOC) adopted Resolution 2011-132, entitled 'In Support of the East-West Connector (Garden Parkway) Toll Road' at its April 27, 2011 Commission meeting.

The BOC is respectfully requesting your support of subject resolution. If you have any questions, please advise.

Sincerely, [Signature]

Martha M. Jordan, Clerk to the Board

- cc: Honorable Phil Berger, NC GA Pro Tempore of the Senate
- Honorable Thom Tillis, NC GA Speaker of the House
- Gaston LEG Delegates (via e-mail)
- NC Senate Transportation Committee Members (via e-mail)
- Senate Appropriations Committee Members (via e-mail)
- NC House Transportation Committee Members (via e-mail)
- House Appropriation Committee Members (via e-mail)
- House Appropriation Subcommittee Members (via e-mail)
- Mr. Eugene A. Conti, Jr., NCTA Chairman & Members (via e-mail)
- NC-DOT Secretary & Members (via e-mail)

128 West Main Avenue, PO Box 1578, Gastonia, NC 28053-1578 Phone: 704-866-3196 - Fax 704-866-3482 E-mail: mjordan@co.gaston.nc.us

RESOLUTION TITLE: GASTON COUNTY BOARD OF COMMISSIONERS - IN SUPPORT OF THE EAST-WEST CONNECTOR (GARDEN PARKWAY) TOLL ROAD

WHEREAS, the proposed East-West Connector (Garden Parkway) is a multilane limited access toll road that will provide additional traffic-carrying capacity between Charlotte and Gastonia and to points south. This has been a high priority project for many civic, private and public partnerships since the first resolution was passed by the Gaston County Board of Commissioners in 1996; and,

WHEREAS, the East-West Connector's Final Environmental Impact Study (EIS) was accepted in June of 2010 and a Record of Decision was issued in October 2010; and,

WHEREAS, the EIS found travel time from South Point and from South Gastonia to Charlotte-Douglas International Airport and uptown Charlotte would be reduced by 23 minutes and 21 minutes respectively, during peak traffic hours; and,

WHEREAS, an Economic Impact Report was prepared in April of 2011 by Dr. John Connaughton, Babson Capital Professor of Financial Economics at the Belk College of Business at UNC-Charlotte and Director of the UNC-Charlotte Economic Forecast for North Carolina. The report found:

- Over the last thirty years, while employment in Mecklenburg, Union and York counties grew by 135%, 155% and 130% - Gaston County's employment lost 3%
- Gaston County did not see growth that the other counties in the Metropolitan Statistical Area (MSA) experienced because of its geographical isolation, its separation or lack of connectivity into the MSA caused by the barrier of the Catawba River; and,

WHEREAS, the Economic Impact Report prepared in April of 2011 identified the following positive outcomes:

- The direct, indirect and induced effects of the four-year construction project for the \$870 million highway will generate 2,667 jobs per year for four years (or a total of 10,668 job-years)
- The construction sector has been the hardest hit by this recession with nearly 40% of all construction jobs being lost, and this project is truly shovel ready and will put people back to work
- It will also generate income of \$95.5 million per year that will be lost in the region if this highway is not built
- The overall economic output generated is forecasted at \$267 million per year for four years
- The long term or 25-year impact of the Garden Parkway is projected to cause 13,800 permanent jobs to be created compared to the no-build scenario if we just apply the State average for job growth in Gaston County; and,

DO NOT TYPE BELOW THIS LINE I, Martha M. Jordan, Clerk to the County Commission, do hereby certify that the above is a true and correct copy of action taken by the Board of Commissioners as follows:

NO.	DATE	M1	M2	M3	M4	M5	M6	M7	M8	M9	M10
2011-131	4/27/2011	TK	AF	AB							

DISTRIBUTION: Governor Beverly Perdue, Hon. Phil Berger, NC GA Pro Tempore of the Senate, Hon. Thom Tillis, NC GA Speaker of the House, Gaston LEG Delegates, NC Senate Transportation Committee Members, Senate Appropriations Committee Members, NC House Transportation Committee Members, House Appropriation Committee Members.

g010

RESOLUTION TITLE: GASTON COUNTY BOARD OF COMMISSIONERS - IN SUPPORT OF THE EAST-WEST CONNECTOR (GARDEN PARKWAY) TOLL ROAD
Page 2

- By applying the Charlotte MSA average, the Parkway would cause 17,828 permanent, new jobs to be created
- Both of these estimates were considered conservative because they did not include the impact of the new Intermodal Terminal or the fact that growth cannot continue in other counties in the region at the same rate as it did in the past because land suitable for development has already been taken except in Gaston County; and,

WHEREAS, the Gaston County Board of Commissioners hereby receives the economic report and commends Dr. John Connaughton and his staff for their efforts in providing additional information needed to make informed decisions by local elected leaders; and,

WHEREAS, the Economic, Employment and Tax Impact Study of the Intermodal Center at the Charlotte-Douglas International Airport prepared for the Charlotte Regional Partnership by Insight Research found an overall cumulative economic impact of \$7.6 billion over 20 years and 5,143 new jobs (or 125,153 new years of work); and,

WHEREAS, the East-West Connector (Garden Parkway) will provide access for the Intermodal Terminal and will provide a significant alternative for the projected 180,000 new truck movements per year to effectively operate during peak hours on I-85 as well as provide opportunities for new jobs in warehouse and distribution to occur within the State of North Carolina.

NOW, THEREFORE, BE IT RESOLVED that the Gaston County Board of Commissioners recognizes and supports previously passed resolutions addressing the future economic needs of Gaston County, the Charlotte region and the State of North Carolina by the construction of this critical connector route. The Gaston County Board of Commissioners also acknowledges their commitment to the East-West Connector (Garden Parkway) knowing that it is vital to the economic future of the County, the Charlotte region, and the State of North Carolina, and urges the State to continue GAP funding for this project

BE IT FURTHER RESOLVED that copies of this resolution are to be forwarded to Governor Beverly Perdue, The Honorable Phil Berger, NC GA Pro Tempore of the Senate; The Honorable Thom Tillis, NC GA Speaker of the House; Gaston LEG Delegates; NC Senate Transportation Committee Members; Senate Appropriations Committee Members; NC House Transportation Committee Members; House Appropriation Committee Members; House Appropriation Subcommittee Members; Mr. Eugene A. Conti, Jr., NCTA Chairman & Members and NC-DOT Secretary & Members.

**RESOLUTION OF CONTINUED SUPPORT FOR THE NORTH CAROLINA'S
TURNPIKE AUTHORITY'S GARDEN PARKWAY**

COUNCIL

David O'Connor
Chair

Dan Harrison
Chief Exec

Brian Hogle
Vice Chair
GCNC

Cathy Kenzig
Past Chair

Alex Hall
Treas

George Ratchford
Gaston Vision 2020

Rev. Darial Jackson
GC3

Deborah Ally
Jaggy Anand
Dr. Terry Brasler
Susan Briggs
Jesse Cole
Kenneth Davison, Jr.
John Kimbrell
Kerri Massey
Reeves McGlohon
Curtis Rosselle
Jason Shoemaker
Rev. Dickie Spargo
Robert Spencer
Terry Stroupe

EX-OFFICIO
Jennie Stultz

WHEREAS, Gaston Together was organized to bring the people and resources of Gaston County together to address unmet county/community needs achieved through the principles and best practices of collaboration, facilitation, promotion and the anticipation of possibilities; and

WHEREAS, the implementation of Gaston Vision 2020, our county's vision for economic development and quality of life growth in Gaston County is a pivotal function of Gaston Together; and

WHEREAS, the Transportation Advisory Council has deemed the Garden Parkway to be the top priority roadway project for the Gaston Urban Area Metropolitan Planning Organization region; and

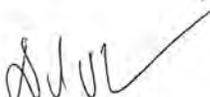
WHEREAS, limited crossing of the Catawba River are constraining travel between Gaston and Mecklenburg Counties and there are only four crossings of the river, none of them located in the southern half of Gaston County; and

WHEREAS, the projected growth in the southern Gaston County and western Mecklenburg County will continue to increase demands for accessibility and connectivity between the two counties; and

WHEREAS, the growing congestion in and around Gaston County could prohibit safe travel for residents in Gaston County;

WHEREAS, our organization is sensitive to the adverse affect (s) this projects has on some property owners, our pledge of support is intended for the greater good of all citizens in Gaston County;

NOW THEREFORE BE IT RESOLVED, that the Gaston Together Council endorses the continued support of the North Carolina Turnpike Authority's plans for the Garden Parkway.


David O'Connor, Chair
Gaston Together Council
April 19, 2011

APPENDIX C4
COMMENT FORMS RECEIVED AT GUAMPO PUBLIC
MEETING HELD FEBRUARY 7, 2011

Document Number	Name	Page Number
c001	Sue Rutledge	C4-1
c002	Rhonda Swafford	C4-2
c003	Lissa McEllington	C4-3
c004	Terry Tracey	C4-3
c005	Bill Toole	C4-4
c006	Kirsten D'Amore	C4-4
c007	David Kiser	C4-5
c008	Danielle Blackwell	C4-5
c009	Neil Booth	C4-6
c010	Glenn Ford	C4-6
c011	John Sly	C4-7
c012	Harriet Armstrong	C4-7
c013	Robert Crisp	C4-8
c014	Mark Painter	C4-8
c015	Paul McMahan	C4-9
c016	Dorothea Delano	C4-9
c017	Ellen Roberts	C4-10
c018	Audrey Fascella	C4-10
c019	Alan Albright	C4-11
c020	Nick Swafford	C4-11
c021	Ben Brackett	C4-12
c022	Robert Davis	C4-12
c023	Marion Beach	C4-13
c024	Jessie Beach	C4-13
c025	Unsigned	C4-14
c026	Frank Ellington	C4-14
c027	Don Harrison	C4-15
c028	Ann Gilreath	C4-15

Document Number	Name	Page Number
c029	Warren Ellington	C4-16
c030	Unsigned	C4-16
c031	Sherrie Ellington	C4-17
c032	Stephen Gilreath	C4-17
c033	Beth Davis	C4-18
c034	Andrew Howe	C4-18
c035	Justin Smith	C4-19
c036	Greg Harmon	C4-19
c037	Rhonda Harmon	C4-20
c038	Joanne Gohr	C4-20
c039	Thomas Taylor	C4-21
c040	Donnie Benfield	C4-21
c041	Deborah Clanton	C4-22
c042	Anthony Giacoffe	C4-22
c043	Melodie Schauer	C4-23
c044	Thomas Wilson	C4-23
c045	Hoyt Helms	C4-24
c046	Terry Knight	C4-24
c047	Joy Sparrow	C4-25
c048	Scott Gallant	C4-25
c049	Jane King	C4-26
c050	Barbara Murphy	C4-26
c051	Barry Joye	C4-27
c052	Woodrow Benfield	C4-27
c053	Thelma Hullett	C4-28
c054	LeeAnn MacMillan	C4-29

c001

DRAFT 2035 Long Range Transportation Plan (LRTP) &
 DRAFT 2011-2020 Statewide Transportation Improvement Plan
 DRAFT Metropolitan Transportation Improvement Plan
 Comment Form



- (f) I don't ever miss an opportunity to voice opposition to this waste of money.
- (g) Use any money dedicated to turnpike funding to maintain the roads we have than are getting in poorer & poorer condition from deferred maintenance. Thanks.
- (h) This project needs to be removed from the STIP.

Name: Sue Rutledge Project Number: Garden - Pinky

Comment

This is not a good use of the taxpayers money. The arguments ~~to~~ against the parkway have been presented many times and I agree with all of them -

- (a) bad numbers relating to payback off turnpike use/revenue generated
- (b) any state tax money should be used on other projects
 - I-85 widening at Belmont
 - 29-78 bridge at Gaston-Meck Co.
 - I-85 widening & I-40 widening throughout system
- (c) There is no significant traffic problem on I-85 except where it narrows at Belmont.
- (d) I drive to work from 2036 South Point Rd Belmont, NC to 531 Spratt St Charlotte in 25 minutes and drive home in 30 minutes during peak time. I have no need to pay to get on a turnpike. This road will not pay for itself as stated.
- (e) There is ample available funding for interstates (over)

DRAFT 2035 Long Range Transportation Plan (LRTP) &
DRAFT 2011-2020 Statewide Transportation Improvement Plan
DRAFT Metropolitan Transportation Improvement Plan
Comment Form

GASTON URBAN AREA



Metropolitan Planning Organization
Mail comments to: Attn: Bernie Yacobucci
James B. Garland Municipal Business Center
150 S. York Street
PO Box 1748
Gastonia, NC 28054

Name: RHONDA SWAFFORD Project Number: U-3321 Barbara Parkway

Comment

1 This road is not needed in Gaston County they
2 need to widen I-85 at the Belmont area to accommodate the
traffic. This highway has been a boondoggle for years.
Someone's "Pet project". No one is going to pay a toll to drive to
Charlotte when we already have roads to accommodate us. We need
to repair all of the bridges that are so under-per in our
state. You can take money for this from the allotted
money, as with the York River Bridge. I feel we just
see smoke-screens about this, we know what you all want
us to know & nothing more. How much opposition will
it take to get your attention? We do not want to
spend our tax dollars on the "Country Road to
nowhere". Now there are jobs being taken. At times
I feel the "little taxpayer" has little to say about what
we want to spend our money on we are adamantly against
3 this road and always will be!!!! I'm offended to think
my tax dollars will be squandered on this project. Please
try to accommodate the working people and have these gathering
(over)

3 when everyone can attend. You're not hearing from ^{c002}
a majority of the public that needs to be heard. It will
not go away, or give in to this waste of taxpayers precious,
hard-earned money! STOP THE TOLL ROAD!

4 What about our schools in jeopardy of losing
teachers and quality education --- put the money there!
It doesn't take a rocket scientist to see the reasoning
here. Seems like you all got the ball rolling & won't
stop at any expense. Please consider other alternatives!

5 STOP THE TOLL ROAD!

Period!

It will not go away without a
fight!

c003

DRAFT 2035 Long Range Transportation Plan (LRTP) &
DRAFT 2011-2020 Statewide Transportation Improvement Plan
DRAFT Metropolitan Transportation Improvement Plan
Comment Form

GASTON URBAN AREA



Metropolitan Planning Organization
Mail comments to: Attn: Bernie Yacobucci
James B. Garland Municipal Business Center
150 S. York Street
PO Box 1748
Gastonia, NC 28054

Name: Lissa Williams Project Number: U-3321

Comment

I am not in favor of a toll road that will become a burden to the taxpayers for years to come. We have more important issues to address.

c004

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James B. Garland Municipal Business Center
150 S. York Street
PO Box 1748
Gastonia, NC 28054

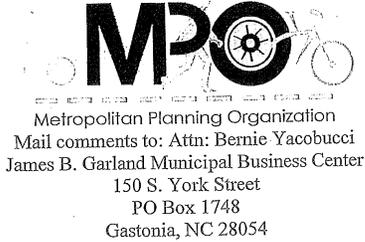
Name: TERRY B. TANCEY Project Number: U-3321

Comment

I THINK THIS PROJECT IS GREAT. THIS WILL HELP GASTONIA TO GROW, THE CITY OF GASTONIA. THIS WILL HELP PEOPLE TO GET TO CHURCHES A LOT FASTER.

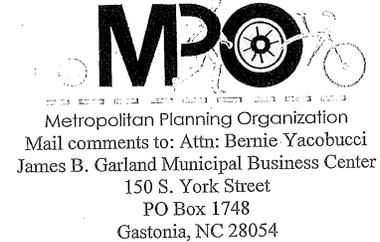
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Name: B. H Toole Project Number: _____

Comment

Take the Garden Park way off the thruway plan because it does not relieve ~~open~~ congestion, it will shift jobs away from the I-95 corridor and out of Gaston County, so it will not improve mobility.

Add widening I-95 at Belmont Abbey from 3 lanes to four lanes to relieve congestion at that bottleneck.

~~Make~~ Make the Wilkerson Bridges at the top of list - #1

Keep ~~Make~~ fixing the I 85 US221 interchange at #2.

Name: Kirsten D'Amore Project Number: _____

Comment

I have made comments in the past but am here to again voice my grave concern regarding this project. This road will be a pass through for truck drivers and those traveling through 485 -> 85 and vic versa. I do not think that this road will benefit Gaston County, as it will destroy beautiful land and bring development which will not lead to jobs. Gaston County has a beautiful rural character which will be lost. Residents are not in favor of this road - only business owner and those who will profit. You need to listen to the residents and stop this road. It is not wanted. Thank you.

c007

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c008

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Name: DAVID KISER Project Number: U-3321

Comment

A decision needs to be made by June 30, 2011 to either build or not build this Parkway. The NCTPA has put people's lives on hold long enough. I personally have (had) plans to build a business on land which is in the path. I cannot sell or build at this point I don't have the money to buy additional property. So, either build the damn road and buy my property or ABANDON the project so I can build.

I am not the only one in this situation. Many people young and old just want it over so they can get on with their lives.

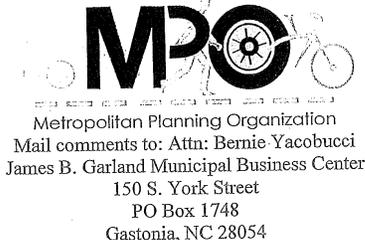
Name: Danelle W Blackwell Project Number: U-3321

Comment

I would like to voice my opposing opinion in regards to the Garden Parkway project. The Garden Parkway is not a good utilization of North Carolina tax payers money. In the summer of 2010, the NC legislature pulled \$15 million of the gap funding from the ~~project~~ \$35 million allocated to the Garden Parkway. This money was not to be touched for anything other than the G.P. With funds stripped from the overall amount money allocated, I do not see that additional funds won't be taken. I do not think that traffic and tolls taken off of the toll road will hit projected amounts and as a result, with gap funding, lower and toll road funds lower, the toll road will have to declare bankruptcy similar to the Greenville toll road. There are so many other road projects or school related issues (teacher salaries) that need our tax money!

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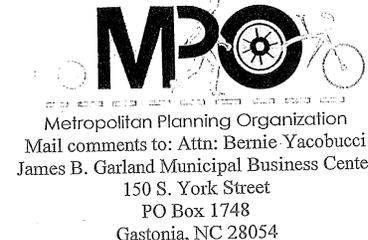
Name: Nail Booth Project Number: U3321

Comment

Hurry up and get it done

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Name: GLENN FORD Project Number: U3321
Garden Parkway

Comment

1 I do NOT support this toll road now + in the future
Gaston county has more pressing needs + this ^{toll road} money
would be better spent on other projects, schools, etc.
This road is not supported by the majority of Gaston
County citizens, It is apparent that our politicians
only support the business leaders in our community
and not the citizens of Gaston County.
2 The better alternative to the toll road is to widen
the I-85 corridor in Gaston County, but no one
wants to talk about this option.
3 I also do not support this road because Gaston
will lose jobs as stated by the Toll Road Authority
ANALYSIS.
I am disappointed that our elected official (Joe
Carpenter) chose not to attend this session. Another
clear example of representation in Gaston County,

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Name: JOHN SLY Project Number: V 3321
315 N. Main St
Belmont, NC Comment
28012

Name: Harriet H. Armstrong Project Number: U-3321
Comment

- ① This meeting was misrepresented. the MPO should have issued a retraction in the paper and restated the purpose.
- ② The #1 issue that was why over 150 people showed up was the Parkway and why our MPO is going against the public opinion. The last poll shows 63% strongly oppose. No one has looked at those that strongly prefer it. Very few — YOU ARE ON THE MPO TO SUPPORT!
- ③ The road was pushed through from a political agenda and from developers that will benefit.
- ④ This road was not needed twenty years ago and still isn't needed. The money ~~can~~ and should be re-applied to other GASTON projects.
- ⑤ MAKE A POLY ^{bridge} across Catawba from South Point Rd ~~to~~ that might support itself.

- ① Garden Parkway will not relieve congestion & it will take jobs to South Carolina.
- ② Wilkinson Bridges need to be replaced. No amount of money is worth the Parkway.
- ③ We need to widen I-85 at the Abbey exit.

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c013

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Name: Robert Crisp Project Number: _____

Comment

Toll Road is NOT Needed!
145 Grassy Ct Gastonia
Crispy123@BellSouth.net

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Name: Mark T. Fowler Project Number: Garden Hwy
U-3321

Comment

1
2
For over two years, the Transportation Commission, The Turnpike Auth and numerous business organizations have been telling us how much this Pkwy will improve our county from a growth and jobs standpoint. A lot of the major reasons that they have listed as positives have ~~later~~ later been retracted: Decreased congestion on I-85 (well, no, not really); New ~~jobs~~ industry (but no one can say what kind or how much); increased job opportunities (... new study shows that over 1000 jobs will move to S.C. or just go away); Turnpike will be two lanes from Hwy 321 to I-85 (... can you say "timely completion of I-485". I wonder what "problems" will arise prior to the start of that section). People are tired of rhetoric, non-answers and what appears to be deceit on the Authorities part. What we want is direct answers to direct questions. With so many "reasons" ~~being changed~~ turning out to be apparent conjecture, ~~either~~ the Turnpike Authority appears to be either inept in their studies or attempting to deceive the people of Gaston Cty. In either case, why should we have faith in anything you say.

c015

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Name: Paul McMahon Project Number: I-85/W 321

Comment

I like A4 2
and
Please build Garden Parkway

Comments for Public Meeting on NCDOT Draft for Gaston County Roads 2012 - 2018

• **East-West Connector**

I have e-mailed my comments about the E/W Connector to the County Commissioners, to Mr. Hank Graham of the GUAMPO, to the NCTA and to several members of the NC Legislature. Since I have written and expressed my opinions so many times, I hope they are not being deleted before being read.

The last e-mail regarded the consideration of rail freight expansion in Gaston County since Norfolk Southern and CDIA is expanding their facilities. I thank those who responded.

• **US 321/I-85 interchange**

There is a critical need to redesign this interchange. Tractor trailers should be allowed on US 321n. It would cut travel times, reduce fuel consumption and decrease the truck population on I-85 and I-77.

• **US 29/74 - Catawba River Bridge**

According to 2006 data, the average daily traffic of motorists using this bridge is 19,000 vpd (Gaston E/W Connector EIS April 2009 p.1-9). It undoubtedly is greater now. It needs widening due to increased traffic.

• **NC 273 South Point Road from Nixon Road to Lower Armstrong Road.**

I don't think this is funded. I believe it should be because of increased traffic in the Belmont Peninsular. Allow plans for bicyclists. This road is used frequently by them.

• **Freight Networks**

Improve and strengthen the freight networks - I-85, US 29/74, NC 273, NC 274, and NC 279. Movement of freight is the hand that feeds Gaston County.

• **Belmont I-85 Bottleneck**

Widen the Belmont/I-85 interchange. There are frequent accidents there.

Dorothea Delano
PO Box 1306
Belmont, NC

February 7, 2011

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Name: ELLEN ROBERTS Project Number: U-33.1

Comment

1 I think this entire project is ridiculous - It's a waste of money putting a road thru the country & this will bring more houses and traffic but no business - Save your money here and widen I-85 for a better flow of traffic.

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Name: Audrey Fascella Project Number: U-33.1

Comment

1 Question: Does the state of NC have the money to pay for the Garden Parkway? Will our taxes increase
Does the state (NC) plan a widening of I-85 in Belmont in the near future? I think that project should be a priority.

2 I do not see how this road through the country will bring business growth to Gaston Co. I see it opening property for new homes - which will increase the burden of school needs, munic. services etc at a time when we are laying off teachers + govt. workers.

This meeting is a sham! We were under the false impression that this would be a forum - Instead we were ushered into a too small area and offered a piece of people to ask questions.

A cowardly spectacle
I bet no one even reads this!

c019

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Name: Alan Albright Project Number: Langholden

Comment

FR IS NOT NECESSARY --
ITY IBS

c020

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Name: Nick Swafford Project Number: 4331

Comment

IT SEEMS TO ME THAT THE MONEY YOU ARE PLANNING
TO SPEND ON THE GARDEN PARKWAY WOULD BE BETTER USED
REPAIRING THE 39-74 BRIDGE OVER THE CATAWBA RIVER OR
MAINTAINING OR IMPROVING CURRENT ROADS.
SCHOOLS ARE CLOSING AND CHILDREN ARE BEING
DENIED A PROPER EDUCATION SO THIS ROAD CAN BE
BUILT. NOBODY WANTS OR WILL USE THIS ROAD.
THERE SHOULD BE A LIMIT TO SPECIAL INTEREST
SPENDING

c021

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Name: Ben Brackett Project Number: U3321

Comment

Widen I-85 - you are wasting money that is
not to be printed up the people will vote 2012.
Better idea widen this area planned out so 759 acres
for the entire planning dept. Don square all students
instant savings

Name: Robert W. Davis Project Number: U3322

Comment

I am a small business owner who is struggling
along with many of my neighbors. I am strongly opposed
to the Garden Parkway. This project should be way down
the totem pole of things that need to happen in Gaston (N.C.).
Our schools are overcrowded, layoffs are plentiful, and
many people are living paycheck to paycheck. The state
of NC is broke and is struggling to pay unemployment
benefits & state tax returns on time. Citizens do not want this
useless project / toll road. Add to the fact that many people
property who have lived at residences for many yrs. will
be taken for a useless toll road at this time has people
angry. I wish this was the 1800's where citizens
could make their point with rhetoric first and
then begin arms to defend what's right. I urge all the
politicians (even the ones who will profit greatly on this proj
(Pittenger/Hayle) to listen to the constituents and do the
right thing for the people by the people. This is not
the right time in this economy and cannot be justifi-
Sincerely, Robert W. Davis

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Name: Marion Beach Project Number: U3321

Comment

I believe that this toll road project is economically unwise! It will fail to produce enough revenue to pay for the bonds if bonds are saleable at a reasonable rate which is highly unlikely. Without the revenue coming the toll road will become bankrupt as has happened in Greenville, SC. and the state of NC, who will have backed the bonds, will have to pay the debt from tax revenues, pushing the state of NC further in the red.
North Carolina cannot afford this
BOONDOGGLE!!

Name: Jessie Beach Project Number: U3321

Comment

This boondoggle will take jobs from Gaston County and move them to South Carolina. It will destroy neighborhoods, family continuity, and households.
It will only become a financial liability

Who Wants the Parkway? (I know most of you sitting out here don't want it) show of hands?

Bill Toole and the Stop the Road to Nowhere folks, who I stand with, have been very polite and have done a great job of bringing neighbors together for this cause. They have done so with out playing the name game or slinging mud. He won't say it but the Charlotte Observer said it.

Who wants the Garden Parkway?

1. The politicians want it. According to the Charlotte Observer in Sept. 7th 2008 article.
2. Democratic Senator David Hoyle and the 4 Star Group stand to make millions from developing the 327 acres that happen to be in close proximity to the proposed parkway. His group wants to build high-end homes and one of the county's largest retail centers. After buying the property in 2006, Hoyle cast at least three votes in the General Assembly to advance the parkway's construction. He is widely credited as the driving force behind the 1.25 billion expressway.
3. Republican Lieutenant Governor Candidate, Robert Pittenger, who was elected to the Senate in 2002 has invested in more property along Garden Parkway routes than State Senator David Hoyle. Mr. Pittenger has a stake in some 2000 acres in the four of the proposed exits. Mr. Pittenger began investing in his current Gaston Holdings in 2002, according to property records. He bought most of the Gaston land from 2004 to 2007 when the parkway was gaining momentum in the legislature. The Robert Pittenger Company owns undeveloped land in light industrial areas near I 85 and Us 321 near proposed parkway exits. The company also owns a large tract in Belmont, along the South Fork of the Catawba River and 220 acres along Union New Hope Road, near property owned by Hoyle's 4-star Investors. State Rep.
4. William Current, a Gaston Republican, also invested in some of Pittenger's Gastonia land. But recently sold the interests to his son.
5. Stowe Botanical Garden Wants it. Increase traffic flow will increase visitors to the Gardens.
6. The land developers want it!
7. Who doesn't want it.....
8. The 37 businesses and two churches that would be taken don't want it. I would venture to say that most of the 348 homeowners who's homes will be bulldozed or otherwise negatively impacted by the road to nowhere don't want it. I'm in this group. My home is right in harms way. That's one reason I don't want it. I don't want the increase tax burden the the 35 million a year will put on all of our backs. In closing let me say that I for one will not go down without a fight!

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Name: Frank Ellington Project Number: Garden Parkway

Comment

1. ① This road is not needed - politicians say we don't know what we are talking about and our numbers are wrong. We have 7,500+ plus signatures that are against this road.
2. ② Use this state money on other roads that are needed. Toll roads do not pay - example Greenville, SC.
3. ③ Take this off the STIP.

Frank Ellington
 416 Breezewood Dr
 Belmont NC 28012

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Name: Dow Harrison Project Number: _____

Comment

① Garden Parkway should be dropped. It
will take jobs away from Gaston.

Name: Ann Gilreath Project Number: U3321

Comment

I am opposed to the Toll Road. With
the struggling economy and unemployment
at a high rate - the average person will seek
out alternative routes to avoid paying
unnecessary tolls. We have much more
important needs to update roads currently
in desperate states. The argument of the money
being ear-marked for the toll road not being
able to be used for these "repairs" concerns me.
First of all ... the (any) money already in
place CAN be moved with votes. But more so,
why continue directing funds to the Toll road
instead of fixing what we have?
Aside from the displacement of homes
that have been in place for many years, those
who remain will have homes with almost 0 value.
(along the route)

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Name: Warren Ellington Project Number: 433.21

Comment

I am opposed to toll road, 70 miles away in Greenville SC there is a bankrupt project just like this one. 35 to 40 million dollars per year for 40 years total 1 billion dollars for a state that is 3.7 billion deficit, laying off thousands of teachers releasing convicted felons, cutting mental health & ignoring legitimate transportation needs: widen I-85 @ Belmont, re-designing 85-321 Interchange, & repairing Highway 75 bridge.

This is a glaring special interest project against the expressed overwhelming majority of the residents of Gaston Co.

Name: _____ Project Number: E3321

Comment

Please Stop the Road,
It does not seem fair to take
some one's house that has been
in your family's ownership for 70 years
without proper compensation and
how can you replace huge oak trees
fruit from, etc



c031

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U3321

Name: Shervie Ellinger Project Number: Garden Park

Comment

This is the most ludicrous idea that we can ever consider! I am a teacher who has not had a raise in 2-3 years. Positions are being eliminated constantly. What are you thinking!! This is not necessary. It is a ~~not~~ thought out. It is outrageous that it is still be considered. The NC STATE is BROKE!
We are not idiots!!!

No one is going to pay to travel this "Toll Road"



c032

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Name: Stephen Gilreath Project Number: U3321

Comment

Please do not allow the GARDEN PARKWAY become a reality. First off there is no real need for it. The money could be used better elsewhere. I do not want to lose my home or part of my property. I have retired and I know I will never be reimbursed enough to keep me in my present condition in life

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Name: Beth Davis Project Number: 113321

Comment

I oppose Garden Parkway. Re-tell road will fly in this area! Remove from STIP if existing roads need to be fixed, widened, repaired! Taking money for this is just wasting everyone's money! We have signed petitions, other petitions and you still ask for more input you are not listening to the people of this county! You are listening to developers who want to make more money for themselves by opening up the southern end of Gaston County!

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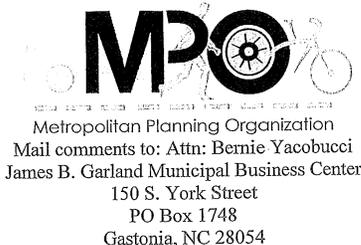
Name: Andrew Howe Project Number: 113321

Comment

Please do not build the "Garden Parkway". We do not want or need it!

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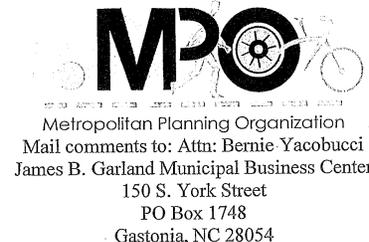
Name: Justin Smith Project Number: _____

Comment

1 So wanting to figure out when they start doing this what way is going to be first. There saying that its going to go from the south to north. When will the house start to be brought and how long will it be before we will move since we all do want to move and don't want it at all. 2 They know that its going to be a waste of money like the one they built in the Raleigh area that nobody uses. They should just make I-85 to 6 lanes all the way down and not make this toll-road go out down the 3 In the final with this planning and everything. The way this is going is jobs going to be moved and people are going to have to frog and find somewhere to live and nobody wants to leave the house and land that they have lived on for so many yrs and that seeing all of it a waste of money and time to make this.

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Name: Greg Harmon Project Number: U3321

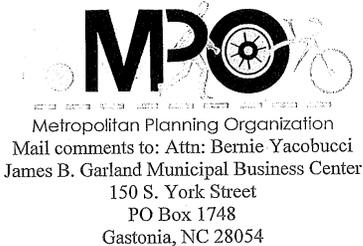
Comment

1 I am opposed to the Garden Parkway. I feel it is a colossal waste of time and resources. In an era in which we can barely keep the doors open to our schools and keeping teachers employed, we can ill afford this 1.5 Billion dollar boondoggle. This was originally sold as traffic relief but now that that has been shown to be a fallacy, the turnpike authority has now said this is for development of Gaston County. I believe it is neither. Put this money to their improvement/widening of I-85 or the I-85/321 exchange.



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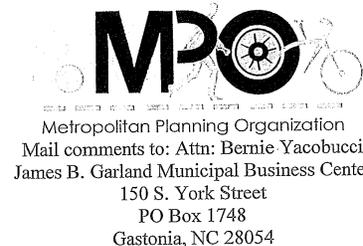
Name: Rhonda B. Harmon Project Number: U33.21 Garden Parkway

Comment

1 I oppose this Parkway. It doesn't
meet the requirements for the estimated
growth that is supposed to come. This
road has been climbed-down to push it thru.
2 It will cost the tax payers more money than
it will produce. The tax papers do not need
to waste this much money. We need to
improve 29/74 (Wilkinson Blvd.) and I-85.
3 The dissecting of communities is unnecessarily
disruptive. Our money should be used to
help our schools. The economy will be
helped by widening I-85 between Belmont
& Bessemer City. You are spending our money
recklessly. This road is not necessary and
should be stopped.

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Name: Joanne Gohr Project Number: U33.21

Comment

1 I am opposed to the Garden Parkway.
It is a waste of tax payer money
not ~~no~~ only for today, but also for
the future generation. Loss of jobs
is something this county does not
need. I can't express it enough on
how wasteful and unnecessary this is.
I plan on never paying a dime ~~to~~ to
driving on this toll road.

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Metropolitan Planning Organization
Mail comments to: Attn: Bernie Yacobucci
James B. Garland Municipal Business Center
150 S. York Street
PO Box 1748
Gastonia, NC 28054

Name: Thomas Taylor Project Number: 43321 Graded Highway

Comment

The proposed project is a perfect waste of tax payer dollars. Many other local road project demand attention. Kubin River bridge and overpass at I-85 in Belmont.

The project is strictly for the politicians which we the people elected.

The real estate investors are the only ones lining their pockets.

This road will lead to an exit of jobs from a county that desperately needs them.

Thomas Taylor

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PO Box 1748
Gastonia, NC 28054

Name: DANNIE BENFIELD Project Number: 203321

Comment

PLEASE-PLEASE-PL-EA-S-E-S-TOP the TOLL ROAD AND USE THE FUNDS ON WIDENING AND REPLACING 74 BRIDGE ALSO RT/RAMP AT I-85. I THINK WE IN GASTON HAVE MADE IT CLEAR- WE THE PEOPLE DON'T WANT IT!!!

READ ABOUT THE TURPIKE AUTHORITY IN DEC-2010 ISSUE WHERE THEY WASTED 43 MILLION YET THEY ARE RAISING TOLL FEES-

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PO Box 1748
Gastonia, NC 28054

Name: Deborah Clanton Project Number: 43321 Tollroad

Comment

This road will take my home at 2765
Linwood Rd. Gastonia. Seven neighbors will lose
their homes. This is WRONG. The money
to build and keep up this road is coming from
taxpayer money and taken from places that
need it more. I will fight with my votes and
time until the last yard of this very
unnecessary road is built.

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Gastonia, NC 28054

Name: Anthony L. Giacobbe Project Number: Toll Rd

Comment

In the light of a 4 Billion dollar
short fall statewide, this project should
stop. Also, its location ignores
South Carolina development as much
as, if not more than North Carolina.
When we will have teacher lay-offs,
police + state workers lay-offs and
no money to fix the roads we have,
this project seems a joke.
I strongly oppose the Toll Rd.

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Name: Melodie Schauer Project Number: Garden Parkway
Belmont, NC Comment

1 I live near the proposed 273 interchange
on for the proposed Garden Parkway +
this is only a 2-lane road w/ several
schools, including a HS, so there is bumper-
to-bumper traffic on 273 now. There are no
plans to widen 273, so this will be a
disaster from a traffic perspective. There
is no way 273 can handle more traffic.

2 I also don't think people are going to
pay a toll to travel such a short distance.

There must be better ways to spend
so many millions.

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PO Box 1748
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Name: Thomas Wilson Project Number: Garden Parkway
503 Brookforest Dr. Comment
Belmont, NC 28012

1 Why do we need a toll road? Nobody has
every answer this question - We do not need
A toll road coming thru South Point community.
This ~~is~~ road will cause the crime rate to
go up in the community. Nobody will use
the road, it will become like 185 in S.C.

Thomas F. Wilson

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150 S. York Street
PO Box 1748
Gastonia, NC 28054

Name: Hayden Project Number: Parkway

Comment

We are not interested in trying to
stop the Parkway

1 We just want to know when it
will start & when we need to move
we can't sell our home due to the
uncertainty we are just fed up with
not knowing. This has been going
on for years

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PO Box 1748
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Name: TERRY KNIGHT Project Number: 43321

Comment

The Expense does not afford this project
The loss of jobs & home will hurt Gaston
County more than help it.

1 The Environmental Study advised against this
project.

We need Road work in other areas rather
than this waste of Tax payer money.

2 We need to consider this negative impact
on our wild life as well.

Terry Knight

c047

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c048

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Mail comments to: Attn: Bernie Yacobucci
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PO Box 1748
Gastonia, NC 28054

Name: Joy Sparrow Project Number: U3321
Comment

This toll road is not needed as we are in a severe economic crisis! The money should go to our schools and law enforcement agencies. Please do not waste our money on this unneeded road!

Name: SCOTT GALLANT Project Number: U3321
Comment

AGAINST GARDEN PARKWAY. SPEND TAXPAYERS MONEY ELSEWHERE.

c049

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PO Box 1748
Gastonia, NC 28054

Name: Jane King Project Number: _____

Comment

The money for the toll road would
be beneficial to build a six lane
bridge across the Catawaba before
the present bridge falls in.
We don't want the parkway.

c050

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Name: Barbara A. Murphy Project Number: 43221

Comment



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2-8-2011

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Metropolitan Planning Organization
Mail comments to: Attn: Bernie Yacobucci
James B. Garland Municipal Business Center
150 S. York Street
PO Box 1748
Gastonia, NC 28054

Name: BARRY JOYE - Project Number: GARDEN PARKWAY

Comment

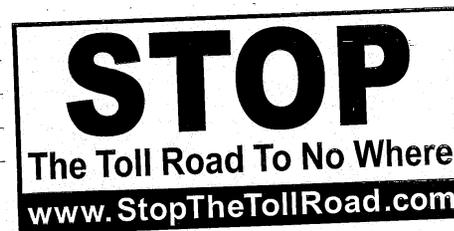
I AM TOTALLY AGAINST THIS PROJECT - FOR SEVERAL REASONS. FIRST THIS ROAD WILL DESTROY THE FIBER OF THE SOUTHERN GASTON Co COMMUNITIES AND IT IS TOO COSTLY AT THIS TIME OF FINANCIAL RECESSION. THIS TOLL ROAD WILL CORRECT TRAFFIC PROBLEMS THAT IS SAID DUE TO TWO PARALLEL HIGHWAYS ACROSS THE COUNTY THAT ARE FREE AND AS TIME COSTLY AS THIS PROJECT - NO BIG TIME SAVOR FOR THE COST OF THE COMMUTED AND PROPERTY OWNERS WHO'S LIVES ARE BEING DESTROYED OR CHANGED. THE ROADS THAT WE HAVE CAN BE IMPROVED AT A LOWER COST AND ACCOMPLISH THE SAME TRAFFIC MOVEMENT WITH OUT DESTROYING GASTON COUNTY. OPEN YOUR EYES FOR ONCE AND DO SOMETHING FOR THE PEOPLE AND NOT JUST THE DEVELOPERS.

THANKS

Name: Wendy W. Raloff Project Number: U3321

Comment

This project should have been stopped years ago - this is being built for politicians not the people of Gaston County. The people won't support a toll road - please listen to the people.



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Mail comments to: Attn: Bernie Yacobucci
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150 S. York Street
PO Box 1748
Gastonia, NC 28054

Name: Thelma Hullett Project Number: U3321

Comment

1 | my concerns for the Gardner Parkway Road.
 | The way the economy is now, it is not the
 | time to build this road. Who is going to pay
 | to use a road when taxes and gas is high
 | and getting higher all the time. People can
 | not afford it. We are struggling to pay for the
 | necessities.

2 | We do not need an interchange at Bud Wilson and
 | Union Road. There is nothing there to get off
 | for.
 | Also, seniors & widows do not need
 | these homes ~~being~~ taken away
 | from them.

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Metropolitan Planning Organization
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PO Box 1748
Gastonia, NC 28054

Name: Lee Ann MacMillan Project Number: 433.21

Comment

*Please see attached —
Also - I find it very convenient for you & suspicious
to us - you would schedule this @ such an inconvenient
time.*

Over the last couple of years there have been numerous reports, studies, forums such as this, ALL indicating the folly of this road...and still you charge ahead disregarding those who will be adversely affected by it, in favor of the developers and speculators and others who will benefit from it, including some who are on the Board.

1 The petition with literally thousands of names on it-the environmental impact study, the HUGE cost-money we don't have-and now the loss of Much needed jobs...are you aware NC is facing an almost \$4 BILLION Shortfall this year? And oh, by the way...you can't decide the impact study is incorrect referencing the loss of jobs, but agree with the parts of it you like.

Folks, there is NO question Gaston County needs to alleviate the congestion On I-85 at the 321 interchange & where it goes from 4 lanes to 3 at the Belmont Abbey exit, but this road you are determined to construct is not, I repeat NOT going to accomplish this and the Turnpike Authority has conceded that fact.

Anyone who has actually looked at the history of Toll Roads, WITH AN OPEN MIND!, has seen they are generally financially unsuccessful. They usually require a bailout with TAXPAYER dollars and we're ALREADY COMMITTED to 35 Million over the next 40 years! By the time the Toll Road is completed, these tolls are considerably higher than originally quoted and not affordable to daily commuters or truckers AND you have already conceded THIS road won't do what you stated was it's purpose several years ago.

This Toll Road is a colossal waste of taxpayers dollars-you are not obligated to spend those dollars here-but you are making a deliberate attempt to undermine and disregard the will of the MAJORITY of Gaston County—YOUR ACTIONS remind me of the way the Healthcare Bill was shoved down our throats @ the Federal Level. This is the kind of arrogance WE THE VOTERS have had enough of—There is a reason the General Assembly, and GASTON specifically, was changed in such a dramatic way—The VOTERS spoke LOUD & CLEAR!

2 To close, I'll just remind you we've been told the PURPOSE of this road is to relieve congestion on I-85, but you have ADMITTED this GARDEN PARKWAY won't accomplish this.

Appendix C4 – GUAMPO Comment Forms

Table C4-1: Public Comment Form Comments

Documents: c001 – c054

DOC. NO.	COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
C004, c009, c015,			Expressed opinions in support of the Garden Parkway and/or the Recommended Alternative.	No detailed responses needed.
C003, c011, c013, c019, c021, c022, c025, c027, c029, c034, c040, c041, c047, c048, c050, c052,			Expressed opinions opposing the Garden Parkway and/or the Recommended Alternative.	No detailed responses needed.
			Blank forms or information requests.	Requests were fulfilled separately. No additional detailed responses needed.
c001	1	Alternatives Considered	The arguments against the parkway have been presented many times and I agree with all of them – a. Bad numbers relating to pay back of turnpike use/revenue generated. B. Any state tax money should be used on other projects....I-85 widening at Belmont, 29-74 bridge at Gaston-Mecklenburg County, and I-85 widening & I-40 widening throughout system.	A detailed Traffic and Revenue Study will be prepared and made available for review prior to the sale of any revenue bonds. The Gaston Urban Area Metropolitan Planning Organization (GUAMPO) determines the local priorities for transportation tax dollars. The Gaston East-West Connector is currently the top priority in the GUAMPO 2035 Long Range Transportation Plan.
c001	2	Traffic and Travel Demand Modeling	There is no significant traffic problem on I-85 except where it narrows at Belmont.	Traffic levels of service along I-85 are discussed in Draft Environmental Impact Statement (Draft EIS) Section 1.6.2.3. Existing (2006) traffic volumes and peak hour levels of service are graphically depicted in Draft EIS Figure 1-4. Future traffic volumes and peak hour levels of service without the proposed project are graphically depicted in Draft EIS Figure 1-5. As shown in Figure 1-4, existing levels of service (LOS) along I-85 in the project study area vary from LOS D to LOS F. LOS D typically is considered acceptable in urban areas and LOS F represents the most congested conditions. In 2030, peak hour levels of service along I-85 are projected to be LOS F throughout the project study area.
c002	1	Purpose and Need for Action	This road is <u>not</u> needed in Gaston County, they need to widen I-85 at the Belmont area to accommodate the traffic.	The purpose of the project, as described in Draft EIS Section 1.3, is to “improve east-west transportation mobility in the area around the City of Gastonia, between Gastonia and the Charlotte metropolitan area, and particularly to establish direct access between the rapidly growing area of southeast Gaston County and western Mecklenburg County.” A variety of Improve Existing Roadways Alternatives were evaluated for the proposed project, as discussed in Draft EIS Section 2.2.6. They were eliminated from detailed study for this project based on the reasons described in Draft EIS Section 2.2.6.5. As discussed in Appendix C of the Draft EIS, it is demonstrated that the Improve Existing Roadways Alternatives that include widening I-85 and/or US 29-74 cannot widen existing roadways enough to provide an acceptable mainline level of service for travel between Gaston County and Mecklenburg County.

Appendix C4 – GUAMPO Comment Forms

Table C4-1: Public Comment Form Comments

Documents: c001 – c054

DOC. NO.	COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
c002	2	Land Use and Transportation Planning	No one is going to pay a toll to drive to Charlotte when we already have roads to accommodate us.	The North Carolina Turnpike Authority (NCTA) prepares studies and makes decisions based on the best information and forecasts available to date. Based on available information, including the <i>Proposed Gaston East-West Connector Preliminary Traffic and Revenue Study</i> (available on the NCTA Web site), and the project’s financial plan, NCTA has determined that the project will be financially feasible. An Investment Grade Traffic and Revenue Study, which includes more in-depth analysis, including a market analysis of potential toll rates, will be conducted prior to selling the bonds that will comprise a portion of the project funding. If this report determines that the project is not financially feasible, bonds will not be sold for the project and alternative forms of financing will be explored.
c002	3	Land Use and Transportation Planning	I’m offended to think my tax dollars will be squandered on this project. Please try to accommodate the working people and have these gatherings when everyone can attend. You’re not hearing from a majority of the public that needs to be heard.	See response to Comment 2 in this letter (letter c002). As described in Section 1.4.1 of the Final EIS, a comprehensive public involvement program has been conducted for this project providing many opportunities for the public to review or comment on the project. The gathering referred to in the comment was a meeting sponsored by GUAMPO to review the Draft 2035 LRTP and was not a meeting specific to the Gaston East-West Connector.
C002	4	Purpose and Need for Action	What about our schools in jeopardy of losing teachers and quality education—put the money there!	Funds identified and allocated for educational purposes are done so by elected officials and also by non-transportation related public agencies at the local, state and federal level. Funding sources identified and allocated for transportation purposes typically cannot be used for education or other non-transportation purposes and vice versa.
C002	5	Alternatives Considered	Please consider other alternatives! Stop the toll road!	In accordance with Council on Environmental Quality (CEQ) regulations (40 CFR 1502.14) and Federal Highway Administration (FHWA) guidance and regulations (FHWA Technical Advisory T6640.8A, 1987 and 23 CFR 771.123(c)), a range of reasonable alternatives, including non-toll alternatives, were rigorously explored and objectively evaluated, as summarized in Chapter 2 of the Draft EIS.
c005	1	Purpose and Need for Action	Take the Garden Parkway off the thoroughfare plan because it does not relieve congestion, it will shift jobs away from the I-85 corridor and out of Gaston County, and it will not improve mobility.	The GUAMPO determines the local priorities for transportation tax dollars. The Gaston East-West Connector is currently the top priority in the GUAMPO 2035 Long Range Transportation Plan.

Appendix C4 – GUAMPO Comment Forms

Table C4-1: Public Comment Form Comments

Documents: c001 – c054

DOC. NO.	COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
c006	1	Indirect and Cumulative Effects	I do not think that this road will benefit Gaston County as it will destroy beautiful land and bring development which will not lead to jobs. Gaston County has a beautiful rural character which will be lost.	Environmental studies for the project discuss both the positive and negative direct and potential indirect effects of constructing the Gaston East-West Connector. All impacts have been minimized to the extent practicable. Land use and zoning restrictions to allow for different types of development are the decision of local governments.
c007	1	Right-of-Way Acquisition and Relocations	I personally have (had) plans to build a business on land which is in the path. I cannot sell or build at this point. I don't have the money to buy additional property. So, either build the <u>dam</u> road and buy my property or ABANDON the project so I can build.	Although minimized to the extent practicable, the project will require relocation of homes and businesses. The NCTA cannot begin the right-of-way acquisition process until after the Record of Decision (ROD) is issued by FHWA. During the right-of-acquisition process, NCTA will follow the right-of-way acquisition and relocation policies of the NCDOT. Upon completion of the ROD, the NCTA will develop a project schedule for final design, right-of-way acquisition, and construction.
c008	1	Land Use and Transportation Planning	I do not think that traffic and tolls taken off of the toll road will hit projected amounts and as a result, with gap funding lower and toll road funds lower, the toll road will have to declare bankruptcy similar to the Greenville toll road.	See response to Comment 2 in comment form c002.
c010	1	Land Use and Transportation Planning	I do not support this toll road now and in the future. Gaston County has more pressing needs and this toll road money would be better spent on other projects, schools, etc.	Funds identified and allocated for educational purposes are done so by elected officials and non-transportation related public agencies at both the state and federal level. Funding sources identified and allocated for transportation purposes cannot be used for education or other purposes and vice versa.
c010	2	Alternatives Considered	The better alternative to the toll road is to widen the I-85 corridor in Gaston County, but no one wants to talk about this option.	See response to Comment 1 in comment form c002.

Appendix C4 – GUAMPO Comment Forms

Table C4-1: Public Comment Form Comments

Documents: c001 – c054

DOC. NO.	COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
c010	3	Indirect and Cumulative Effects	I also do not support this road because Gaston will lose jobs...as stated by the Toll Road Authority analysis.	<p>The results of the Quantitative Indirect and Cumulative Effects Assessment (ICE), summarized in ROD Section 3.5, estimate that the ICE Study Area could grow by 300 fewer jobs with the proposed project in place compared to the No-Build Scenario. In both scenarios, employment is estimated to grow by 32,800-33,100 jobs between 2005 and 2035.</p> <p>Final EIS Section 2.5.5.4 describes the gravity model methodology used in the ICE assessment. The gravity model formulation assumes that areas where accessibility increases as a result of a transportation project will be relatively more attractive for development than if the project had not been built. The gravity model provides an indication of the potential effects of just the proposed project. However, other factors can influence the likelihood of regional development shifts and include land availability and price, state of the regional economy, infrastructure, location attractiveness and amenities, local political/regulatory conditions, and land use controls. Some of these other factors can be influenced by local government actions.</p>
c012	1	Indirect and Cumulative Effects	Garden Parkway will not relieve congestion and it will take jobs to South Carolina.	<p>See response to Comment 3 in comment form c010.</p> <p>The New Location Toll Alternative would reduce traffic volumes on I-85 primarily from NC 279 eastward compared to the No-Build Alternative, although levels of service would remain at LOS E or F in 2030. Similar to the Improve Existing Roadways Alternatives, there is not a large reduction in traffic volumes predicted to occur on I-85 because with the project in place, trips that are diverted to the Gaston East-West Connector from I-85 are replaced with different trips on I-85 that would like to use I-85 but had not in the past due to congestion. Overall, however, there is less congested vehicle hours and miles traveled with the New Location Toll Alternative in place, reducing the amount of congestion in the network.</p>
c014	1	Purpose and Need for Action, Indirect and Cumulative Effects	A lot of the major reasons that they have listed as positives have later been retracted: decreased congestion on I-85 (well, no, not really); new industry (but no one can say what kind or how much); increased job opportunities (new study shows that over 1,000 jobs will move to S.C. or just go away).	See responses to Comment 3 in comment form c010 and Comment 1 in comment form c012.

Appendix C4 – GUAMPO Comment Forms

Table C4-1: Public Comment Form Comments

Documents: c001 – c054

DOC. NO.	COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
c014	2	Land Use and Transportation Planning	With so many “reasons” turning out to be apparent conjecture, the Turnpike Authority appears to be either inept in their studies or attempting to deceive the people of Gaston County. In either case, why should we have faith in anything you say?	All studies prepared for the project meet the requirements of the National Environmental Policy Act (NEPA) and have been reviewed and approved by State and Federal officials. Most documents are also posted for public review/download on the project website at www.ncdot.org/projects/gardenparkway , with the remainder available upon request.
c016	1	Comment Noted	I have e-mailed my comments about the E/W Connector to the County Commissioners, to Mr. Hank Graham of the GUAMPO, to the NCTA and to several members of the NC legislature. Since I have written and expressed my opinions so many times, I hope they are not being deleted before being read.	All comment forms and letters included in this ROD have been reviewed and considered. Responses are provided to substantive comments.
c017	1	Alternatives Considered	It’s a waste of money putting a road thru the county. This will bring more houses and traffic but no business. Save your money here and widen I-85 for a better flow of traffic.	See response to Comment 1 in comment form c002.
c018	1	Land Use and Transportation Planning	Question: Does the state of NC have the money to pay for the Garden Parkway? Will our taxes increase? Does the state (NC) plan a widening of I-85 in Belmont in the near future?	See response to Comment 2 in comment form c002. There are currently no plans to widen I-85 in Gaston County. Drivers who use the Garden Parkway will be charged a toll. The project would not increase general taxes paid by the public.
c018	2	Indirect and Cumulative Effects	I do not see how this road through the county will bring business growth to Gaston Co. I see it opening property for new homes – which will increase the burden of school needs, municipal services, etc. at a time when we are laying off teachers and government workers.	An evaluation of potential indirect effects of the project on land use was completed as part of the environmental studies. The results of this evaluation are summarized in the Final EIS Section 2.5.5, and are updated as described in Section 3.5 of the ROD. However, land use and zoning to allow for different types of development are the decision of local governments.
c020	1	Alternatives Considered	It seems to me that this money you are planning to spend on the Garden Parkway would be better used repairing the 29-74 bridge over the Catawba River or maintaining or improving current roads.	The GUAMPO determines the local priorities for transportation tax dollars. The Gaston East-West Connector is currently the top priority in the GUAMPO 2035 Long Range Transportation Plan (LRTP). The LRTP also includes the widening (from four to six lanes) of the US 29-74 bridge over the Catawba River as a project to be built by 2025.
c023	1	Land Use and Transportation Planning	I believe that this toll road project is economically unwise! It will fail to produce enough revenue to pay for the bonds if bonds are salable at a reasonable rate which is highly unlikely.	See response to Comment 2 in comment form c002
c024	1	Indirect and Cumulative Effects	This boondoggle will take jobs from Gaston County and move them to South Carolina. It will destroy neighborhoods, family continuity, and households.	See responses to Comment 3 in comment form c010 and Comment 1 in comment form c012.

Appendix C4 – GUAMPO Comment Forms

Table C4-1: Public Comment Form Comments

Documents: c001 – c054

DOC. NO.	COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
c026	1	Purpose and Need for Action	This road is not needed. Politicians say we don't know what we are talking about and our numbers are wrong. We have 7,500 plus signatures that are against this road.	The referenced petitions were reviewed and considered, and are discussed in Section 3.3.1 of the Final EIS. The project remains a top priority of the GUAMPO in their 2035 Long Range Transportation Plan.
c026	2	Alternatives Considered	Use this state money on other roads that are needed. Toll roads do not pay – example : Greenville, SC.	See response to Comment 2 in comment form c002.
c028	1	Land Use and Transportation Planning	We have much more important needs to update roads currently in desperate states. The argument of the money being earmarked for the toll road not being able to be used for these "repairs" concerns me.	See response to Comment 1 in comment form c020.
c030	1	Right-of-Way Acquisition and Relocation	It does not seem fair to take someone's house that has been in your family's ownership for 70 years without proper compensation.	As discussed in Draft EIS Section 3.2.3.2 and Final EIS Section 2.5.1.2, the NCTA follows the relocation policies of the NC Department of Transportation (NCDOT), which include providing fair market value compensation for property. Information about these policies is available on the project web site at: www.ncdot.org/projects/gardenparkway .
c031	1	Comment Noted	No one is going to pay to travel this "Toll Road".	See response to Comment 2 in comment form c002.
c032	1	Purpose and Need for Action	First off there is no real need for it. The money could be used better elsewhere.	See response to Comment 1 in comment form c020.
c032	2	Right-of-Way Acquisition and Relocation	I have retired and I know I will never be reimbursed enough to keep me in my present condition in life.	See response to Comment 1 in comment form c030.
c033	1	Right-of-Way Acquisition and Relocation	Taking homes for this is just wasting everyone's money! We have signed petition after petition and you still ask for more input. You are not listening to the people of this county. You are listening to the developers who want to make more money for themselves by opening up the southern end of Gaston County.	See response to Comment 1 in comment form c026. The National Environmental Policy Act and FHWA and NCDOT regulations and guidance require agencies to provide multiple opportunities for public input and participation throughout the process. Governmental agencies and MPOs have had the opportunity to review public input provided on this project and their positions that this project is a top priority have not changed. The project remains a top priority in the GUAMPO 2035 Long Range Transportation Plan. Responses to comments received have been included in the Final EIS Appendix B and the appendices of this Record of Decision.

Appendix C4 – GUAMPO Comment Forms

Table C4-1: Public Comment Form Comments

Documents: c001 – c054

DOC. NO.	COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
c035	1	Right-of-Way Acquisition and Relocation	So wanting to figure out when they will start doing this. What way is going to be first. The[y']re saying that it's going to go from the south to north. When will the houses start to be brought and how long will it be before we will [k]now since we all do want to move and don't want it at all.	A detailed project schedule for construction activities will not be developed until all required financing has been secured and a contractor has been selected to build the roadway.
c035	2	Land Use and Transportation Planning	They know that it is going to be a waste of money like the one they built in the Raleigh area that nobody uses.	The Western Wake (Triangle Expressway) is under construction in the Raleigh area. The first section (Triangle Parkway) opened to traffic in December 2011, with toll collection beginning January 3, 2012.
c035	3	Alternatives Considered	They should just make I-85 to 6 lanes all the way down and not make this toll road go but down there in the trash with this planning and everything.	See response to Comment 1 in comment form c002.
c036	1	Purpose and Need for Action	This was originally sold as traffic relief but now that that has been shown to be a fallacy, the Turnpike Authority has now said this is for development of Gaston County.	See response to Comment 1 in comment form c002.
c037	1	Purpose and Need for Action	I oppose this Parkway. It doesn't meet the requirements for the estimated growth that is supposed to come.	See response to Comment 1 and 2 in comment form c002 .
c037	2	Purpose and Need for Action	It will cost the tax payers more money than it will produce.	See response to Comment 2 in comment form c002.
c037	3	Community Characteristics and Resources	The dissecting of communities is unnecessarily disruptive.	The Recommended Alternative and Preferred Alternative were identified based on a balance of cost and design considerations, impacts to the human and natural environments, and input received from agencies and the public, as described in the Draft EIS (Recommended Alternative), Final EIS (Preferred Alternative), and ROD (Selected Alternative). Impacts to community resources are summarized in the ROD. During final design, efforts will continue to be made to avoid and minimize impacts where practicable.
c038	1	Indirect and Cumulative Effects	Loss of jobs is something this county does not need either. I can't express it enough on how wasteful and unnecessary this is.	See response to Comment 3 in letter c010.
c039	1	Indirect and Cumulative Effects	This road will lead to an exit of jobs from a county that desperately needs them.	See response to Comment 3 in comment form c010.

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Table C4-1: Public Comment Form Comments

Documents: c001 – c054

DOC. NO.	COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
c042	1	Purpose and Need for Action	This project should stop. Also, its location favors South Carolina development as much as, if not more than, North Carolina.	See response to Comment 3 in comment form c010.
c043	1	Land Use and Transportation Planning	There are no plans to widen 273, so this will be a disaster from a traffic perspective. There is no way 273 can handle more traffic.	The GUAMPO determines the local priorities for transportation tax dollars. The Gaston East-West Connector is currently the top priority in the GUAMPO 2035 Long Range Transportation Plan (LRTP). The LRTP also includes the widening (from two to four lanes) of NC 273 as an unfunded project.
c043	2	Comment Noted	I also don't think people are going to pay a toll to travel such a short distance.	See response to Comment 2 in comment form c002.
c044	1	Land Use and Transportation Planning	Why do we need a toll road? Nobody has ever answered this question. We do not need a toll road coming thru South Point community.	See response to Comment 1 in comment form c002. A need to improve east-west mobility and for a southern bypass was first identified by the GUAMPO in 1989. In 2001, the environmental analysis, or NEPA study, was begun under the direction of the NCDOT. The project was identified as a candidate toll facility in 2005. Because of anticipated project costs, in 2007 NCDOT determined that it was unlikely to implement this project as a non-toll facility and only toll alternatives should be evaluated. The project, as a toll facility, continues to be a top priority in the latest GUAMPO 2035 Long Range Transportation Plan.
c045	1	Right-of-Way Acquisition and Relocation	We just want to know when it will start and when we need to move so we can sell our house due to the uncertainty we are just fed up with not knowing.	See response to Comment 1 in comment form c007.
c046	1	Indirect and Cumulative Effects	The Environmental Study advised against this project.	The environmental studies completed for the project evaluate and report the potential impacts of the project. The Final EIS identified Detailed Study Alternative 9 as the Preferred Alternative and this Record of Decision identifies Detailed Study Alternative 9 as the Selected Alternative. This alternative balances impacts and meets the need for the project.
c046	2	Protected Species and Wildlife	We need to consider the negative impact on our wildlife as well.	Final EIS Sections 2.5.4.3 and 2.5.5.8 address the Preferred Alternative's impacts on wildlife.
c049	1	Alternatives Considered	The money for the toll road would be beneficial to build a six lane bridge across the Catawba before the present bridge falls in.	See response to Comment 1 in comment form c020.

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Table C4-1: Public Comment Form Comments

Documents: c001 – c054

DOC. NO.	COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
c051	1	Community Characteristics and Resources	I am totally against this project – for several reasons. First this road will destroy the fiber of the southern Gaston County communities and it is too costly at this time of financial stress.	See response to Comment 3 in letter c037.
c053	1	Comment Noted	Who is going to pay to use a road when taxes and gas is high and getting higher all the time?	See response to Comment 2 in comment form c002.
c053	2	Alternatives Considered	We do not need an interchange at Bud Wilson & Union Road. There is nothing there to get off for.	The interchange at Bud Wilson Road was eliminated from the Preferred Alternative. Union Road (NC 274) is a major roadway in southern Gaston County. The interchange at Union Road would provide access to the central portion of southern Gaston County via this NC route. The identification of interchange locations is coordinated closely with the local Metropolitan Planning Organization (MPO) and the inclusion or removal of any interchange must be consistent with their Long Range Transportation Plan. All interchanges currently included in this project are included in the GUAMPO's 2035 LRTP.
c054	1	Indirect and Cumulative Effects	The petition with literally thousands of names on it – the environmental impact study, the HUGE cost – money we don't have – and now the loss of Much needed jobs...are you aware NC is facing an almost \$4 BILLION Shortfall this year? And oh, by the way...you can't decide the impact study is incorrect referencing the loss of jobs, but agree with the parts of it you like.	Regarding the petition, see response to Comment 1 in Comment Form c026 and response to Comment 1 in Comment Form c033. Regarding cost, see response to Comment 2 in Comment Form c002. Regarding jobs. see response to Comment 3 in Comment Form c010:
c054	2	Purpose and Need for Action	To close, I'll just remind you we've been told the PURPOSE of this road is to relieve congestion on I-85, but you have ADMITTED this GARDEN PARKWAY won't accomplish this.	The purpose of the project, as described in Final EIS Section 1.1.3 is to "improve east-west transportation mobility in the area around the City of Gastonia, between Gastonia and the Charlotte metropolitan area, and particularly to establish direct access between the rapidly growing area of southeast Gaston County and western Mecklenburg County." Improving I-85 and US 29-74 are not specific performance measures used to evaluate alternatives. Rather, the less narrow performance measure used is to provide a transportation facility with a mainline that would operate at acceptable levels of service. The project purpose, along with other information, was included in handouts distributed at the Citizens Informational Workshops in 2003, 2006, and 2008. The slideshow presented at the Pre-Hearing Open Houses in June 2009 also described the project purpose.