

## **APPENDIX B2**

### **LOCAL GOVERNMENT COMMENTS AND RESPONSES**

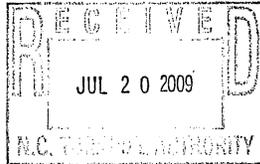
<b>Document Number</b>	<b>Agency/Organization</b>	<b>Date</b>	<b>Page Number</b>
g001	City of Belmont	07/17/09	B2-1
g002	Gaston County Commissioners	07/16/09	B2-3
g003	Gaston Urban Area Metropolitan Planning Organization	06/03/09	B2-5
g004	Gaston Urban Area Metropolitan Planning Organization	07/27/09	B2-8
g005	Mecklenburg County Park and Recreation Department	07/27/09	B2-11
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City of Belmont

115 N. MAIN STREET  
POST OFFICE BOX 431  
BELMONT, N.C. 28012  
PHONE (704) 825-5586



July 17, 2009

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

Dear Ms. Harris:

On behalf of the City of Belmont, I am forwarding a "Resolution of the City of Belmont Regarding the Draft Environmental Impact Study for the Garden Parkway." This resolution was adopted during the City Council's meeting of Monday, July 13, 2009.

Please accept this document as the formal comment of the City of Belmont on the Draft EIS as presented at the most recent series of open houses and public meetings conducted in June 2009 in both Gaston and Mecklenburg County.

Sincerely,

Barry L. Webb  
City Manager

Enclosure



City of Belmont

115 N. MAIN STREET  
POST OFFICE BOX 431  
BELMONT, N.C. 28012  
PHONE (704) 825-5586

**RESOLUTION OF THE CITY OF BELMONT  
REGARDING THE DRAFT ENVIRONMENTAL IMPACT STUDY  
FOR THE GARDEN PARKWAY**

WHEREAS, the NC Turnpike Authority has now issued the Draft Environmental Impact Statement (EIS) for the Gaston East-West Connector, also referred to as the Garden Parkway; and

WHEREAS, the NC Turnpike Authority has, as noted in the Draft EIS, selected Alternative 9, or northern alignment, as the preferred alignment for the Garden Parkway; and

WHEREAS, the City Council of the City of Belmont has on two prior occasions (February 1, 1999 and December 1, 2008) adopted resolutions endorsing the selection of what had been previously referred to as the Middle Alignment (K1D):

NOW, THEREFORE, BE IT RESOLVED, that the City Council of the City of Belmont, North Carolina hereby reaffirms its position requesting that the NC Turnpike Authority reconsider its abandonment of the former Middle Alignment (K1D) by further researching a route that, while necessarily avoiding new improvements to Duke Energy's Plant Allen Steam Station, would more closely adhere to the route formally proposed by the original Gaston County Citizens Bypass Committee, preferably paralleling the northern bank of the Plant Allen canal as closely as possible.

BE IT, THEREFORE, FURTHER RESOLVED, that the City Council of the City of Belmont, North Carolina also affirms its support of another bridge crossing of the Catawba River on the South Point peninsula to alleviate future traffic in this area.

Adopted this the 13<sup>th</sup> day of July, 2009.

Richard N. Boyce, Mayor

ATTEST:

Noelle Rufford  
City Clerk

**Appendix B2 – Local Government Comments**

**Table B2-1: City of Belmont**

**Document: g001 letter dated July 17, 2009**

COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
1	Alternatives Considered	<p>WHEREAS, the City Council of the City of Belmont has on two prior occasions (February 1, 1999 and December 1, 2008) adopted resolutions endorsing the selection of what had been previously referred to as the Middle Alignment (KID):</p> <p>NOW, THEREFORE, BE IT RESOLVED, that the City Council of the City of Belmont, North Carolina hereby reaffirms its position requesting that the NC Turnpike Authority reconsider its abandonment of the former Middle Alignment (KID) by further researching a route that, while necessarily avoiding new improvements to Duke Energy's Plant Allen Steam Station, would more closely adhere to the route formally proposed by the original Gaston County Citizens Bypass Committee, preferably paralleling the northern bank of the Plant Allen canal as closely as possible.</p> <p>BE IT, THEREFORE, FURTHER RESOLVED, that the City Council of the City of Belmont, North Carolina also affirms its support of another bridge crossing of the Catawba River on the South Point peninsula to alleviate future traffic in this area.</p>	Resolution acknowledged. The reasons why Corridor Segment K1D was eliminated from further consideration are explained in 2.3.4.2 of the Draft EIS (pages 2-40 to 2-41).

Gaston County  
Board of Commissioners  
www.co.gaston.nc.us



Mickey Price  
Chair  
South Point Township

Allen R. Fraley  
Vice-Chair  
Cherryville Township

Joe D. Carpenter  
Crowders Mtn. Township

Tom Keigher  
Gastonia Township

Donnie Loftis  
Gastonia Township

Tracy L. Philbeck  
Dallas Township

John A. Torbett  
Riverbend 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

July 16, 2009

Secretary Eugene A. Conti  
North Carolina Department of Transportation  
1501 Mail Service Center  
Raleigh, NC 27699-1507

Dear Secretary Conti:

I am writing this letter to express my concerns about recent articles that we are seeing in area newspapers indicating that the Garden Parkway will not relieve traffic on I-85 and will terminate at US321.

It is my opinion that the Parkway needs to run from I-485 to I-85 near Edgewood Road and **NOT** terminate at US321 South of Gastonia. Termination of the Garden Parkway at 321 South of Gastonia will increase traffic on I-85 rather than decrease it. It also could impact toll road use and therefore reduce toll fee intake which is proposed for Garden Parkway road payments. As you already know, I-85 is a very heavily traveled road consisting of great numbers of trucks and automobiles.

1

The Garden Parkway was intended to be the major backbone of Gaston County's highway network to enable quicker access to Charlotte Douglas Airport, relieve congestion on the current US29/74 Bypass, and perform a similar role for I-85 upon its completion

2

Thank you for taking my comments under consideration.

Sincerely,

Mickey Price  
Gaston County Commissioner

cc: Mr. Mike Holder - NC-DOT Division Engineer

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

**Appendix B2 – Local Government Comments**

**Table B2-2: Gaston County Commissioners**  
**Document: g002 letter dated July 16, 2009**

COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
1	Land Use and Transportation Planning	It is my opinion that the Parkway needs to run from I-485 to I-85 near Edgewood Road and NOT terminate at US 321 south of Gastonia. Termination of the Garden Parkway at 321 south of Gastonia will increase traffic on I85 rather than decrease it. It also could impact toll road use and therefore reduce toll fee intake which is proposed for Garden Parkway road payments.	The ultimate project would extend from I-85 west of Gastonia to I-485 in Mecklenburg County, as described and evaluated in the Draft EIS. However, construction of large transportation projects such as the Gaston East-West Connector, I-485 in Charlotte, I-540 in Raleigh, etc., are typically constructed in phases as funding becomes available. Construction phases are determined after the environmental planning phase is completed based on availability of funding. The intent is to build as much of the project in the first phase as possible, with the remainder constructed as soon as possible after that. At this time, based on available information, NCTA is planning on initially constructing the entire length of the project, with four lanes from I-485 to US 321 and two lanes from US 321 to I-85. The section from US 321 to I-85 would be upgraded to four lanes by 2035.
2	Land Use and Transportation Planning	The Garden Parkway was intended to be the major backbone of Gaston county's highway network to enable quicker access to Charlotte Douglas Airport, relieve congestion on the current US29/74 Bypass, and perform a similar role for I-85 upon its completion.	Comment acknowledged.

Gaston Urban Area  
Metropolitan Planning Organization  
Transportation Planning

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

June 3, 2009

Governor Beverly Perdue  
Office of the Governor  
20301 Mail Service Center  
Raleigh, NC 27699-0301

Dear Governor Perdue:

Enclosed, please find the Resolution Endorsing the North Carolina Turnpike Authority's Draft Environmental Impact Statement for the Garden Parkway as conducted by the Gaston Urban Area Metropolitan Planning Organization. At its May 26, 2009 meeting, the Gaston Urban Area MPO's Technical Advisory Committee (TAC) voted to approve this resolution of support.

1 The TAC has deemed the Garden Parkway to be the top priority roadway project for the Gaston Urban Area MPO region as the number of residences in southern Gaston County and western Mecklenburg County has increased by 24% over the last eight years and the limited number of crossings of the Catawba River constrains travel between the two counties.

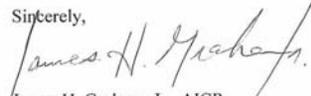
2 There is a lack of connecting east-west roadways in southern Gaston County, despite the extant and predicted high rates of growth in this area. This rapid growth, coupled with the already crowded Interstate 85, necessitates a new roadway to help ameliorate traffic congestion and improve regional mobility.

The Garden Parkway is a Strategic Highway Corridor and is designated as a new freeway facility within the Strategic Highway Corridors Vision Plan.

3 Additionally, the Garden Parkway project will improve air quality monitoring and emission conditions for the Charlotte Metropolitan region, of which the Gaston Urban Area MPO is a part. This is particularly necessary as this region was designated an 8-hour ozone non-attainment area in 2005, meaning that any road projects that can lessen congestion are extremely important.

If there are any questions regarding this resolution, please contact the MPO staff.

Sincerely,



James H. Graham, Jr., AICP  
Principal Transportation Planner  
Gaston Urban Area MPO

cc: David W. Joyner, Executive Director, NCTA  
Eugene A. Conti, Secretary, NCDOT  
Shannon Ransom, Gaston MPO Coordinator  
Jennifer Harris, P.E., NCTA

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Dallas  
Gaston County  
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Spencer Mountain  
Stanley

**RESOLUTION ENDORSING THE NORTH CAROLINA  
TURNPIKE AUTHORITY'S DRAFT 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

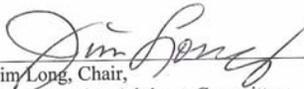
WHEREAS, the Gaston Urban Area Metropolitan Planning Organization (GUAMPO) and the Mecklenburg-Union MPO (MUMPO) show in their plans a new location roadway running through southern Gaston County and connecting over the Catawba River to Mecklenburg County; and

WHEREAS, the Garden Parkway is a Strategic Highway Corridor (SHC); and

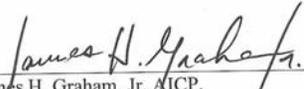
WHEREAS, the Garden Parkway is designated as a new freeway facility within the Strategic Highway Corridors Vision Plan; and

WHEREAS, congestion and frequent incidents on I-85 inhibit regional travel and diminish the ability of I-85 to function as a Strategic Highway Corridor,

4 NOW THEREFORE BE IT RESOLVED, that the Transportation Advisory Committee of the Gaston Urban Area Metropolitan Planning Organization endorses the Draft Environmental Impact Statement conducted by the North Carolina Turnpike Authority.

  
\_\_\_\_\_  
Jim Long, 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 Mr. Carpenter, seconded by Mr. Murphy,  
by a yote 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  
**Jim Long** personally appeared before me on this the 26th day of May, 2009, and  
acknowledge the due execution of the foregoing instrument.

Witness my hand and official seal, this the 26th day of May, 2009.

  
\_\_\_\_\_  
Cathleen L. Roberts  
Notary Public

My Commission Expires 7/8/2010



Appendix B2 – Local Government Comments

**Table B2-3: Gaston Urban Area Metropolitan Planning Organization**

**Document: g003 letter dated July 16, 2009**

COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
1	Land Use and Transportation Planning	The TAC has deemed the Garden Parkway to be the top priority roadway project for the Gaston Urban Area MPO region as the number of residences in southern Gaston County and western Mecklenburg County has increased by 24% over the last eight years and the limited number of crossings of the Catawba River constrains travel between the two counties.	Comment acknowledged.
2	Land Use and Transportation Planning	There is a lack of connecting east-west roadways in southern Gaston County, despite the extant and predicted high rates of growth in this area. This rapid growth, coupled with the already crowded Interstate 85, necessitates a new roadway to help ameliorate traffic congestion and improve regional mobility. The Garden Parkway is a Strategic Highway Corridor and is designated as a new freeway facility within the Strategic Highway Corridors Vision Plan.	Comment acknowledged.
3	Air Quality	Additionally, the Garden Parkway project will improve air quality monitoring and emission conditions for the Charlotte Metropolitan region, of which the Gaston Urban Area MPO is a part. This is particularly necessary as this region was designated an 8-hour ozone non-attainment area in 2005, meaning that any road projects that can lessen congestion are extremely important.	USDOT made a conformity determination on the MUMPO and GUAMPO 2035 LRTPs and TIPs on May 3, 2010.  As discussed in <b>Section 2.5.2.2</b> , 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 <i>2035 LRTP</i> and <i>2009-2015 TIP</i> 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 <i>2035 LRTP</i> and <i>2009-2015 TIP</i> 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 <b>Appendix K</b> of this Final EIS.
4	Alternatives Considered	NOW THEREFORE BE IT RESOLVED, that the Transportation Advisory Committee of the Gaston Urban Area Metropolitan Planning Organization endorses the Draft Environmental Impact Statement conducted by the North Carolina Turnpike Authority.	Resolution acknowledged.

Gaston Urban Area  
Metropolitan Planning Organization  
Transportation Planning

Mailing Address:  
PO Box 1748  
Gastonia, North Carolina 28053

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150 South York Street  
Gastonia, North Carolina 28052

Tel: (704) 866.6837  
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www.gastonmpo.org

July 27, 2009

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

Subject: Gaston East-West Connector (Garden Parkway) Comments

Dear Ms. Harris:

Enclosed, please find comments provided by the Gaston Urban Area Metropolitan Planning Organization (MPO) with regard to the Draft Environmental Impact Statement for the Gaston East-West Connector (Garden Parkway).

Comments/Concerns:

- 1) Eliminate construction or move interchange #7 Bud Wilson Road to Beaty Road  
Rationale:
  - a) Beaty Rd. will serve new residential and commercial developments (Springhaven & Pressley).
  - b) Projected traffic counts between Bud Wilson and Union Rd. is ~28,000. There are current plans to straighten Union Rd. to lessen the traffic through residential areas and the current Bud Wilson interchange would actually increase traffic.
  - c) Extending and relocating the interchange to Beaty Road would be more feasible from a cost effective and functional standpoint. (See attached functional design for Union/Beaty Rd.)
- 2) Leave both the Edgewood Road/I-85 and Gastonia/Bessemer City HWY I-85 interchanges open.
- 3) Provide a more detailed explanation of why projected traffic counts along I-85 continues to remain high even in light of Garden Parkway construction. The project's purpose and need statement, states that the Garden Parkway is to provide an alternative Catawba River crossing between Gaston County and Mecklenburg County.
- 4) Please adjust alignment as to not detrimentally impact the Belmont Optimist Athletic Park.

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- 5) The current Gaston MPO thoroughfare plan includes the proposed Belmont/Mt. Holly loop which intersects the Garden Parkway. Please incorporate a grade separated crossing (over or underpass) for this functional design segment.
- 6) The Gaston MPO strongly supports the new intersection location of Hudson Blvd and the Garden Parkway.

Please take these comments into consideration while preparing a Final Environmental Impact Statement. If you have any questions, please feel free to contact me or other MPO staff members.

Sincerely,

*James H. Graham, Jr.*  
James H. Graham, Jr., AICP  
Principal Transportation Planner  
Gaston Urban Area MPO

- c: Jim Long, TAC Chair  
Kevin Krouse, TCC Chair  
Jim Palenick, City Manager  
Jack Kiser, AICP, Planning Director

Appendix B2 – Local Government Comments

Table B2-4: Gaston Urban Area Metropolitan Planning Organization

Document: g004 letter dated July 27, 2009

COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
1	Land Use and Transportation Planning	Eliminate construction or move interchange #7 Bud Wilson Road to Beaty Road. Rationale: a) Beaty Rd. will serve new residential and commercial developments (Springhaven & Pressley). b) Projected traffic counts between Bud Wilson and Union Rd. is ~28,000. There are current plans to straighten Union Rd. to lessen the traffic through residential areas and the current Bud Wilson interchange would actually increase traffic. c) Extending and relocating the interchange to Beaty Road would be more feasible from a cost effective and functional standpoint. (See attached functional design for Union/Beaty Rd.)	As discussed in <b>Section 2.3.1.5</b> , the interchange at Bud Wilson Road was eliminated as part of the refined preliminary design for the Preferred Alternative.
2	Land Use and Transportation Planning	Leave both the Edgewood Road/I-85 and the Gastonia/Bessemer City Hwy/I-85 interchanges open.	The refined preliminary design for the Preferred Alternative (DSA 9) maintains access to I-85 from Edgewood Road and NC 274 (Bessemer City Road).
3	Land Use and Transportation Planning	Provide a more detailed explanation of why projected traffic counts along 1-85 continue to remain high even in light of Garden Parkway construction. The project's purpose and need statement, states that the Garden Parkway is to provide an alternative Catawba River crossing between Gaston County and Mecklenburg County.	Discussions of travel demand model results are included in the Draft EIS. In Section 2.2.7.2 of the Draft EIS, the first bullet states: "Based on the 2030 Metrolina travel demand model, some diversion of traffic off of I-85 and US 29-74 is projected to occur in 2030 if a New Location Alternative (Toll or Non Toll Scenario) is built. Due to the latent demand for travel between Gaston and Mecklenburg counties, the diversion of some traffic off of I-85 would be partially offset because some trips that currently use other facilities would be attracted to I-85 as it becomes less congested. "  In other words, 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 hadn't in the past due to congestion.  Additional detailed discussions of the travel demand model are included in Section C.1.2 of Appendix C.
4	Community Characteristics and Resources	Please adjust alignment as to not detrimentally impact the Belmont Optimist Athletic Park.	The NCTA has modified the preliminary design of the Preferred Alternative to avoid direct encroachment on the expanded recreational fields, as discussed in <b>Section 2.3.1</b> of the Final EIS. These modified designs also avoided two electric transmission towers. A letter dated June 18, 2009 was sent from NCTA to Mr. Kelvin Reagan, Optimist Club President, describing the design changes. These modifications, and potential access roads, have been included in the Final EIS.

**Appendix B2 – Local Government Comments**

**Table B2-4: Gaston Urban Area Metropolitan Planning Organization**

**Document: g004 letter dated July 27, 2009**

COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
5	Land Use and Transportation Planning	The current Gaston MPO thoroughfare plan includes the proposed Belmont/Mt. Holly loop which intersects the Garden Parkway. Please incorporate a grade separated crossing (over or underpass) for this functional design segment.	The proposed Belmont/Mt. Holly loop is a long range project listed as an unfunded project in the Gaston Urban Area MPO 2035 Long Range Transportation Plan. The Belmont-Mount Holly Loop is a future project independent of the Gaston East-West Connector and not under the purview of the NCTA. Its exact location is not known at this time. However, if another entity decides to pursue constructing the Belmont-Mount Holly Loop in the Gaston East-West Connector area, NCTA will provide project information to that entity to enable them to complete their separate studies and designs.
6	Land Use and Transportation Planning	The Gaston MPO strongly supports the new intersection location of Hudson Blvd and the Garden Parkway.	Comment acknowledged.



MECKLENBURG COUNTY  
Park and Recreation Department

July 27, 2009

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

Subject: Proposed Gaston E-W Connector (STIP Project U-3321) Draft Environmental Impact Statement

Dear Ms. Harris:

Mecklenburg County Park and Recreation has reviewed the Draft Environmental Impact Statement for the Gaston East-West Connector (STIP Project U-3321) and is submitting the following comments in response.

As stated in the report, Mecklenburg County Park and Recreation (MCPR) recognizes the necessity the Turnpike Authority pursuing minor right-of-way acquisition along the edges of publicly-owned property designated as future Berewick Park. MCPR requests only continued diligence in minimizing this impact to public property. Additionally, for the sake of consistency in public documents, please note that the future park has been reclassified and should henceforth be referred to as Berewick Regional Park.

In chapter 3, Table 3-9 lists the parks and recreational facilities impacts. The column titled "Acres" lists the acreage of the public land and a percentage of that land that will need to be taken. The percentages of land to be taken associated with Berewick Regional Park are incorrect and should read as follows: for segment K3C, 0.81%; for segment K4A, 1.6%.

MCPR also recognizes the Turnpike Authority's possible pursuit of a finding of de minimis effect with regard to Berewick Regional Park, as stated in Chapter 5 (Cultural Resources). MCPR concurs that the identified impacts stemming from the various detailed study alternatives will not adversely affect the use, function, or development of the property as intended.

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In conclusion, MCPR appreciates the cooperation and coordination that Turnpike Authority has extended during this process. We encourage the Turnpike Authority to continue to work toward minimizing impacts to all cultural resources and, as such, notes preference for Detailed Study Alternative #9. If you have any questions or need additional information please feel free to contact me at (704) 336-8466.

Sincerely,  
  
W. Lee Jones, ALA  
Capital Planning Services Division Director

Copy to: James R. Garges, CRPR, Park and Recreation Director  
Blaine Gregory, Senior Park Planner  
David Nelson, South Region Park Planner  
Nancy Brunnemer, Real Estate Manager  
Patricia Poteat, West Region General Manager  
Mike Raible, CMS Director of Facilities Planning

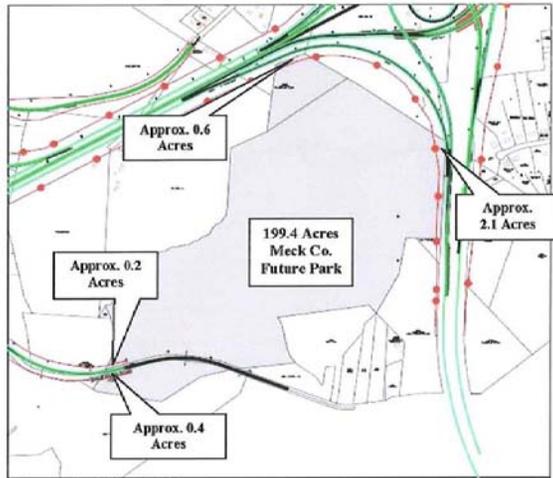
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g005

Gaston East-West Connector (STIP Project U-3321)  
Corridor Segment K4A  
Preliminary Engineering Designs  
April 28, 2008



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Appendix B2 – Local Government Comments

**Table B2-5: Mecklenburg County Park and Recreation Department**

**Document: g005 letter dated July 27, 2009**

COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
1	Comment Noted	As stated in the report, Mecklenburg County Park and Recreation (MCPR) recognizes the necessity the Turnpike Authority pursuing minor right-of-way acquisition along the edges of publicly-owned property designated as future Berewick Park. MCPR requests only continued diligence in minimizing this impact to public property. Additionally, for the sake of consistency in public documents, please note that the future park has been reclassified and should henceforth be referred to as Berewick Regional Park.	The refined preliminary design for the Preferred Alternative resulted in no direct impacts to Berewick Regional Park. NCTA acknowledges the reclassification of Berewick Park as a Regional Park and references to the park in the Final EIS refer to it as "Berewick Regional Park."
2	Community Characteristics and Resources	In chapter 3, Table 3-9 lists the parks and recreational facilities impacts. The column titled "Acres" lists the acreage of the public land and a percentage of that land that will need to be taken. The percentages of land to be taken associated with Berewick Regional Park are incorrect and should read as follows: for segment K3C, 0.81%; for segment K4A, 1.6%.	The percentages for Segment K3C (DSAs 4, 9, 22, 27, 58, 68, 76, and 81) and Segment K4A (DSAs 5, 23, 64, and 77) were inadvertently switched. This error is noted and corrected in the errata section of the Final EIS.
3	Comment Noted	MCPR also recognizes the Turnpike Authority's possible pursuit of a finding of de minimis effect with regard to Berewick Regional Park, as stated in Chapter 5 ( Cultural Resources). MCPR concurs that the identified impacts stemming from the various detailed study alternatives will not adversely affect the use, function, or development of the property as intended.	Comment acknowledged. As discussed in <b>Section 2.5.3.3</b> of the Final EIS, the refined preliminary design for the Preferred Alternative no longer directly impacts Berewick Regional Park and no further action under Section 4(f) is required.
4	Comment Noted	We encourage the Turnpike Authority to continue to work toward minimizing impacts to <u>all</u> cultural resources and, as such, notes preference for Detailed Study Alternative #9.	DSA 9 was selected as the Preferred Alternative, as described in <b>Section 2.2</b> of the Final EIS.



MECKLENBURG - UNION  
METROPOLITAN PLANNING ORGANIZATION

600 East Fourth Street  
Charlotte, North Carolina 28202-2853  
704-336-2205  
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MECKLENBURG COUNTY  
MINT HILL  
MONROE  
NCDOT  
PINEVILLE  
STALLINGS  
UNION COUNTY  
WAXHAW  
WEDDINGTON  
WESLEY CHAPEL  
WINGATE

TO: Jennifer Harris, PE  
North Carolina Turnpike Authority

FROM: Robert W. Cook, AICP  
MUMPO Secretary

DATE: July 20, 2009

SUBJECT: **MUMPO Technical Coordinating Committee  
Comments on the Draft Environmental Impact  
Statement for the Gaston East-West Connector**

**MEMORANDUM**

The following comments on the subject project were prepared in consultation with the Mecklenburg-Union Metropolitan Planning Organization's (MUMPO) Technical Coordinating Committee (TCC). NOTE: These comments are exclusively regarding the portion of the project in Mecklenburg County.

1. Page S-16, Section S.9, 4th bullet: The sentence should read: Local LRTPs should be developed to ensure consistency of design concept and scope with the Preferred Alternative (if the preferred alternative is a toll facility).
2. Page 1-5, Sec. 1.4.2.1: Add the following notations:
  - 2005: The MUMPO 2030 LRTP financial assumptions note that Urban Loop funds will be made available for construction of the Garden Parkway.
  - 2009: Financial assumptions for the 2035 LRTP state that the project will be built as a toll facility.
3. Page 1-7, Sec. 1.5.1.1: I-85 begins in Petersburg, Virginia, not Richmond, Virginia. I-485 now extends beyond NC 16 to NC 115 in northeast Mecklenburg County.
4. Page 1-8, Sec. 1.5.1.1: There is a proposed diamond interchange for I-485 at the West Boulevard Ext. for which the ramps have been graded.
5. Page 1-9, Section 1.5.1.3: The 2nd paragraph notes 19,000 vpd on US 29-74 in 2006 at the Catawba River while Table 1-3 notes the same location with 45,100 vpd.
6. Page 1-10, Section 1.5.2.1: There is no CSX line within the study area.

MPO TCC Comments  
Gaston East-West Connector DEIS  
July 20, 2009

g006

7. Page 1-21, Section 1.8.2.1: The alignment for the Gaston East-West Connector referred to in Figure 1-9 is also misaligned in Figure 1-10. The intent is for the alignments to match. There may be an error in one of the MPO GIS files that caused this mismatch. If this alignment is corrected on figures 1-9 and 1-10, please remove the sentence referencing the mismatch.
8. Page 1-23, Section 1.8.2.4: Project U-3411 was not ranked in the 2030 LRTP because it was funded and considered as an Existing & Committed (Funded) project. Delete the sentence about the project not being ranked.
9. Figure 1-1: The map should show I-485 being complete north of I-85 to just east of I-77.
10. Figures 1-9 and 1-10: Both maps show the Connector being offset at the Catawba River (See comments above referencing Page 1-21).
11. Page 2-35, Section 2.3.2.2, Exhibit 2-1: Include a larger, color version of the Future Airport Layout map, either as a Figure in Chapter 2 or in the Appendices.
12. Figures 2-9 gg, 2-9hh: Charlotte-Durham Int'l Airport should be Charlotte-Douglas International Airport.
13. Figures 2-9 gg, 2-9hh, 2-9ii: Show the interchange with I-485 for each alternative on separate maps.
14. Figures 2-9ii: The note by the West Boulevard Realignment should either be removed or state "Construction by Others" instead of "Construction by Airport."
15. A relocation of Garrison Road, a north-south, minor thoroughfare, is shown on the MUMPO Thoroughfare Plan. The Connector's design should not preclude a future grade separation between it and Garrison Road.
16. The document should include updated maps of new roadways in the vicinity of the Charlotte-Douglas International Airport, including the Wallace Neel Road Relocation.
17. How will traffic from the relocated Wallace Neel Road get to Steele Creek Road once the East-West Connector is open to traffic?
18. Access will need to be provided to the Charlotte-Douglas International Airport's intermodal facility which will have its primary entrance near the current intersection of Steele Creek Road and Byrum Dr.
19. Consult Charlotte-Douglas International Airport staff to determine if there are conflicts between the proposed design of the Connector east of the I-485 interchange toward Steele Creek Road.

- 17 20. There should be accommodations for bicycle lanes and sidewalks on Dixie River Road and the relocated Garrison Road where they cross the Connector.
- 18 21. Were the runway approaches from Charlotte Douglas International Airport taken into consideration with the I-485/Gaston East –West Connector interchange design?
- 19 22. Will there be provisions for pedestrians and/or bicyclists on the bridge over the Catawba River?
- 20 23. The Charlotte-Douglas International Airport will be paving the ramps for the West Boulevard Extension interchange with I-485. This interchange will have a simple diamond configuration. The Gaston-East-West Connector should utilize this interchange as much as possible to preserve the existing infrastructure to maximize construction cost savings.
- 21 24. Page S-11, Section S.8.3.2, 2nd paragraph: It is important to note that this project is part of a conforming transportation plan. However, compliance with the ozone and/or CO NAAQS is not demonstrated if the project is included in a conforming transportation plan. Conformity is not equivalent to meeting the NAAQS.
- 22 25. Page 4-16 & 4-17, Section 4.2.2: Starting in the 6th paragraph on page 4-16, an “interim emissions test” in a moderate nonattainment area requires a finding that emissions will be less with the proposed improvements in the LRTP/TIP than they would be without the improvements.
- 23 26. Page 4-18, Section 4.2.2: In the 1st paragraph, an “interim emissions test” in a moderate nonattainment area requires a finding that emissions will be less with the proposed improvements in the LRTP/TIP than they would be without the improvements. In marginal nonattainment areas, the interim emissions test is a “no greater than” test.
- 24 27. Page 4-22, Section 4.2.5.1: In the top paragraph, the sentence beginning with “Therefore, compliance of a project with the ozone NAAQS...” is not correct. Compliance with the ozone NAAQS is not demonstrated if the project is included in a conforming plan. In marginal nonattainment areas, the interim emissions test is a “no greater than” test.
- 25 28. Page 4-24, Section 4.2.5.3: Air quality impacts due to construction can be reduced significantly by following the recommendations in the EPA document, *Cleaner Diesels: Low Cost Ways to Reduce Emissions from Construction Equipment* (March, 2007). Construction equipment using diesel or gasoline fuel should be no earlier than the 2007 model year, or if older, should be retrofitted with pollution control devices to be equivalent to a 2007 model year. This can result in a 90 percent reduction in NOx and PM emissions.

- 26 29. The report does not include an air quality assessment of the Connector. There is no estimate of daily NOx emissions for any of the alternatives for any project completion year. There is also no estimate of what the daily NOx emissions for the no-build scenario. The VMT projections provided in Appendix H do show a difference between building the bypass, and not building the bypass. While the emissions of NOx do not directly indicate how much ozone may be formed, NOx is essential to the formation of ozone.

cc: Wayne Herron, AICP, TCC Chairman  
Bill Cox, TCC Vice-Chairman

## Appendix B2 – Local Government Comments

**Table B2-6: Mecklenburg-Union Metropolitan Planning Organization**

**Document: g006 letter dated July 20, 2009**

COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
1	Land Use and Transportation Planning	Page S-16, Section S.9, 4th bullet: The sentence should read: Local LRTPs should be developed to ensure consistency of design concept and scope with the Preferred Alternative (if the preferred alternative is a toll facility).	<p>As described in the Draft EIS Sections 1.8.2.2, 1.8.2.4, and 4.2.2, the project is addressed in both the GUAMPO and MUMPO LRTPs; however, these Plans were developed before the project was fully defined through the NEPA process. Table PC-1 - Special Commitments and Coordination Required After the DEIS - included a commitment that NCTA would work with the GUAMPO and the MUMPO to ensure the air quality conformity determination for the region includes the project's design concept and scope consistent with the Preferred Alternative.</p> <p>As discussed in <b>Section 2.5.2.2</b>, 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 <i>2035 LRTP</i> and <i>2009-2015 TIP</i> 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 <i>2035 LRTP</i> and <i>2009-2015 TIP</i> 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 <b>Appendix K</b> of this Final EIS.</p>
2	Land Use and Transportation Planning	Page 1-5, Sec. 1.4.2.1: Add the following notations: •2005: The MUMPO 2030 LRTP financial assumptions note that Urban Loop funds will be made available for construction of the Garden Parkway. •2009: Financial assumptions for the 2035 LRTP state that the project will be built as a toll facility.	The Draft EIS is not required to address historic funding options for the project.
3	Editorial	Page 1-7, Sec. 1.5.1.1: I-85 begins in Petersburg, Virginia, not Richmond, Virginia. I-485 now extends beyond NC 16 to NC 115 in northeast Mecklenburg County.	Correction noted in <b>Appendix A - Errata</b> .
4	Land Use and Transportation Planning	Page 1-8, Sec. 1.5.1.1: There is a proposed diamond interchange for I-485 at the West Boulevard Ext. for which the ramps have been graded.	The ramps at the West Boulevard Extension/Garrison Road grade separation of I-485 were not paved and not open to traffic at the time the Draft EIS was published.

## Appendix B2 – Local Government Comments

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COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
5	Land Use and Transportation Planning	Page 1-9, Section 1.5.1.3: The 2nd paragraph notes 19,000 vpd on US 29-74 in 2006 at the Catawba River while Table 1-3 notes the same location with 45,100 vpd.	<p>The volume reported on page 1-9 was an actual 2006 traffic count. The volumes reported in Table 1-3 are interpolated 2006 values from the Metrolina Regional Travel Demand Model.</p> <p>At the time traffic forecast efforts began, NCTA’s consultants obtained the approved Metrolina Travel Demand Model for the 13-county region surrounding Charlotte which was used to develop the traffic forecasts for the project. Traffic forecasting methodologies and results are documented in the <i>Traffic Forecasting for Toll Alternatives</i> (August 2008). The version of the model used to perform the project forecasts was calibrated based on known traffic volumes for the base year 2000, with the model providing forecasts for years 2010, 2020, and 2030. Volumes for the project’s base year of 2006 were obtained by interpolating between the calibrated base year 2000 and the forecast year 2010.</p> <p>Since the travel demand model was calibrated to year 2000 traffic volumes, it can be expected that actual counts for any given subsequent year could vary at some locations. A comparison of the model’s 2006 results (Existing Conditions scenario) with actual 2006 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 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 has actually occurred up to 2006, resulting in lower actual traffic counts for that particular year compared to forecasted values.</p>
6	Land Use and Transportation Planning	Page 1-10, Section 1.5.2.1: There is no CSX line within the study area.	The rail line is a Norfolk-Southern line, not a Norfolk-Southern and CSX rail line, as stated in Section 1.5.2.1. This error is noted and corrected in the errata section of the Final EIS. This error does not change the analyses or conclusions reached in the Draft EIS.

## Appendix B2 – Local Government Comments

**Table B2-6: Mecklenburg-Union Metropolitan Planning Organization**

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COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
7	Land Use and Transportation Planning	Page 1-21, Section 1.8.2.1: The alignment for the Gaston East-West Connector referred to in Figure 1-9 is also misaligned in Figure 1-10. The intent is for the alignments to match. There may be an error in one of the MPO GIS files that caused this mismatch. If this alignment is corrected on figures 1-9 and 1-10, please remove the sentence referencing the mismatch.	As noted, the proposed project does not line up at the Gaston County/Mecklenburg County line on Figure 1-9 of the Draft EIS. The GIS files provided by Gaston County and Mecklenburg County showing their MPO's alignments for the Gaston East-West Connector are shown as they were provided. This mismatch is likely associated with map scaling. The 2035 LRTPs for GUAMPO and MUMPO areas show the proposed project properly aligning across the county line.
8	Land Use and Transportation Planning	Page 1-23, Section 1.8.2.4: Project U-3411 was not ranked in the 2030 LRTP because it was funded and considered as an Existing & Committed (Funded) project. Delete the sentence about the project not being ranked.	This error is noted and corrected in the errata section of the Final EIS. This error does not change the analyses or conclusions reached in the Draft EIS.
9	Editorial	Figure 1-1: The map should show I-485 being complete north of I-85 to just east of I-77.	Correction noted. However, the correction does not change the analysis or conclusions reached in the Draft EIS.
10	Land Use and Transportation Planning	Figures 1-9 and 1-10: Both maps show the Connector being offset at the Catawba River (See comments above referencing Page 1-21).	See response to Comment 7 in MUMPO's letter (Document g006).
11	Editorial	Page 2-35, Section 2.3.2.2, Exhibit 2-1: Include a larger, color version of the Future Airport Layout map, either as a Figure in Chapter 2 or in the Appendices.	Request noted. However, inclusion of the requested map does not provide any additional information that would change the analyses or conclusions reached in the Draft EIS.
12	Editorial	Figures 2-9 gg, 2-9hh: Charlotte-Durham Int'l Airport should be Charlotte-Douglas International Airport.	Figures 2-9gg and 2-9ii (not 2-9hh) of the Draft EIS had incorrect names identified for the Charlotte-Douglas International Airport. This error is noted and corrected in the errata section of the Final EIS. This error does not change the analyses or conclusions reached in the Draft EIS.
13	Editorial	Figures 2-9 gg, 2-9hh, 2-9ii: Show the interchange with I-485 for each alternative on separate maps.	Figures 2-9a through ii show one to two interchanges per figure. Preparing one figure per interchange would result in a substantial increase in the number of figures in Chapter 2 of the Draft EIS. The Public Hearing Maps, available for download on the NCTA Web site ( <a href="http://www.ncturnpike.org/projects/gaston/documents.asp">http://www.ncturnpike.org/projects/gaston/documents.asp</a> ) show each corridor, and the interchanges, individually. Since the existing figures sufficiently illustrate each interchange the requested revisions have not been implemented in the Final EIS. The Final EIS does include a similar figure, <b>Figure 2-3a-r</b> , for the Preferred Alternative, which shows the revised preliminary engineering designs only for the Preferred Alternative.

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COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
14	Editorial	Figures 2-9ii: The note by the West Boulevard Realignment should either be removed or state "Construction by Others" instead of "Construction by Airport."	Comment acknowledged. However, the requested revision does not change the analyses or conclusions reached in the Draft EIS. <b>Figure 2-3a-r</b> which shows the refined preliminary design for the Preferred Alternative, includes the revised note.
15	Land Use and Transportation Planning	A relocation of Garrison Road, a north-south, minor thoroughfare, is shown on the MUMPO Thoroughfare Plan. The Connector's design should not preclude a future grade separation between it and Garrison Road.	An extension of Garrison Road, which includes a grade separation with the Gaston East-West Connector, is a long range project shown on the MUMPO Thoroughfare Plan. An extension of Garrison Road is a future project independent of the Gaston East-West Connector and not under the purview of the NCTA. Its exact location and timeframe for implementation is not known at this time. However, if another entity decides to pursue an extension of Garrison Road either north/south to the west of I-485 or east/west over I-485, NCTA will provide project information to that entity to enable them to complete their separate studies and designs.
16	Land Use and Transportation Planning	The document should include updated maps of new roadways in the vicinity of the Charlotte-Douglas International Airport, including the Wallace Neel Road Relocation.  How will traffic from the relocated Wallace Neel Road get to Steele Creek Road once the East-West Connector is open to traffic?  Access will need to be provided to the Charlotte-Douglas International Airport's intermodal facility which will have its primary entrance near the current intersection of Steele Creek Road and Byrum Dr.  Consult Charlotte-Douglas International Airport staff to determine if there are conflicts between the proposed design of the Connector east of the I-485 interchange toward Steele Creek Road.	The NCTA will work with the Charlotte-Douglas International Airport, Charlotte DOT, and MUMPO to determine if there are any design conflicts with these agencies' plans for improving and modifying the local roads serving the airport. Coordination meetings with these agencies and the NCDOT were held on November 4, 2009, and January 19, 2010. These meetings, and other coordination, resulted in design changes to the Preferred Alternative in the area of the I-485 interchange. These changes are described in detail in <b>Section 2.5.1</b> of the Final EIS.
17	Land Use and Transportation Planning	There should be accommodations for bicycle lanes and sidewalks on Dixie River Road and the relocated Garrison Road where they cross the Connector.	During final design, the NCTA will work with local jurisdictions to provide sidewalks and other crossings where appropriate and can be funded.
18	Land Use and Transportation Planning	Were the runway approaches from Charlotte Douglas International Airport taken into consideration with the I-485/Gaston East –West Connector interchange design?	The vertical clearances for the runways were provided by the Charlotte-Douglas International Airport and considered in the design of the Gaston East-West Connector interchange at I-485. Coordination with Charlotte Douglas International Airport officials is ongoing. Please also see response to comment 16 in MUMPO's letter (Document g006).
19	Land Use and Transportation Planning	Will there be provisions for pedestrians and/or bicyclists on the bridge over the Catawba River?	The bridge over the Catawba River will be designed so as not to preclude the future accommodation of a bicycle/pedestrian facility to be funded separately by other entities such as local jurisdictions.

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COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
20	Land Use and Transportation Planning	The Charlotte-Douglas International Airport will be paving the ramps for the West Boulevard Extension interchange with I-485. This interchange will have a simple diamond configuration. The Gaston-East-West Connector should utilize this interchange as much as possible to preserve the existing infrastructure to maximize construction cost savings.	Comment acknowledged. The design of the freeway-to-freeway interchange of the Gaston East-West Connector and I-485 does not accommodate the use of the simple diamond interchange at Garrison Road and I-485. Please also see response to Comment 16 in MUMPO's letter (Document g006).
21	Air Quality	Page 5-11, Section 5.8.3.2, 2nd paragraph: It is important to note that this project is part of a conforming transportation plan. However, compliance with the ozone and/or CO NAAQS is not demonstrated if the project is included in a conforming transportation plan. Conformity is not equivalent to meeting the NAAQS.	Comment acknowledged. The air quality sections of the Final EIS do not describe conformity as compliance with specific NAAQS.
22	Air Quality	Page 4-16 & 4-17, Section 4.2.2: Starting in the 6th paragraph on page 4-16, an "interim emissions test" in a moderate nonattainment area requires a finding that emissions will be less with the proposed improvements in the LRTP/TIP than they would be without the improvements.	This error is noted and corrected in the errata section of the Final EIS. This error does not change the analyses or conclusions reached in the Draft EIS.
23	Air Quality	Page 4-18, Section 4.2.2: In the 1st paragraph, an "interim emissions test" in a moderate nonattainment area requires a finding that emissions will be less with the proposed improvements in the LRTP/TIP than they would be without the improvements. In marginal nonattainment areas, the interim emissions test is a "no greater than" test.	This error is noted and corrected in the errata section of the Final EIS. This error does not change the analyses or conclusions reached in the Draft EIS.
24	Air Quality	Page 4-22, Section 4.2.5.1: In the top paragraph, the sentence beginning with "Therefore, compliance of a project with the ozone NAAQS..." is not correct. Compliance with the ozone NAAQS is not demonstrated if the project is included in a conforming plan. In marginal nonattainment areas, the interim emissions test is a "no greater than" test.	See response to Comments 21 and 22 in MUMPO's letter (Document g006).
25	Air Quality	Page 4-24, Section 4.2.5.3: Air quality impacts due to construction can be reduced significantly by following the recommendations in the EPA document, Cleaner Diesels: Low Cost Ways to Reduce Emissions from Construction Equipment (March, 2007). Construction equipment using diesel or gasoline fuel should be no earlier than the 2007 model year, or if older, should be retrofitted with pollution control devices to be equivalent to a 2007 model year. This can result in a 90 percent reduction in NOx and PM emissions.	The NCTA will comply with all applicable federal, state, and local air quality regulations in effect at the time of construction.

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COMMENT NO.	PRIMARY TOPIC	COMMENT	RESPONSE
26	Air Quality	The report does not include an air quality assessment of the Connector. There is no estimate of daily NOx emissions for any of the alternatives for any project completion year. There is also no estimate of what the daily NOx emissions for the no-build scenario. The VMT projections provided in Appendix H do show a difference between building the bypass, and not building the bypass. While the emissions of NOx do not directly indicate how much ozone may be formed, NOx is essential to the formation of ozone.	The Draft EIS includes an air quality assessment in accordance with FHWA guidance and procedures. As discussed in Section 4.2.5.1 in the Draft EIS, ozone is a regional problem. Since ozone takes several hours to form from hydrocarbons and nitrogen oxide, urban areas as a whole are regarded as sources of ozone precursors, not traffic on individual streets and highways. The GUAMPO and MUMPO 2035 LRTPs include the Gaston East-West Connector as a toll facility, and the USDOT made a conformity determination on the MUMPO and GUAMPO 2035 LRTPs and TIPs on May 3, 2010 and on October 5, 2010., as discussed in <b>Section 2.5.5.2</b>