

BLUE RIDGE ENVIRONMENTAL DEFENSE LEAGUE

1828 Brandon Ave. SW
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August 23, 2019

Scott Smizik, Project Manager
VDOT Environmental Division
1401 East Broad Street
Richmond, VA 23219
Email: Martinsville220@vdot.virginia.gov

Dear Mr. Smizik:

COMMENTS TO VDOT RE: Martinsville Southern Connector Study PH Comments

I am writing to provide comments on behalf of the Blue Ridge Environmental Defense League (BREDL) regarding the Martinsville Southern Connector Study Public Hearing Comments – Henry County.

BREDL is a regional, community-based, non-profit environmental organization founded in March 1984. Our founding principles are earth stewardship, environmental democracy, social justice, and community empowerment. BREDL has chapters and members throughout the Southeast, including Henry County.

Alternatives

On January 11, 2001 BREDL submitted comments to VDOT for the I-73 Draft Environmental Impact Statement. In our comments, we stressed that several alternatives should have been studied during the I-73 DEIS. We mentioned that a study of improving U.S. 220 along its existing route including techniques such as Access Management was not properly studied during the I-73 environmental process. Unfortunately, we have the same concern with the Martinsville Southern Connector (MSC). Had a proper study of U.S. 220 improvements been completed decades ago, we may be enjoying the benefits of an improved U.S. 220 today instead of proposing yet another destructive, unfunded and unnecessary new terrain highway.

We concur that this stretch of U.S. 220 needs improvements for safety and mobility issues. We strongly believe that these can be accomplished through Access Management and other arterial preservation techniques as part of an upgraded U.S. 220 alternative. This will provide improvements to mobility and safety for local and regional use while being beneficial to economic and environmental concerns. Businesses along the current U.S. 220 route will suffer if traffic is routed away from them. U.S. 220 improvements will be much cheaper and happen much faster than constructing a new terrain freeway.

The July & August 2018 VDOT newsletters on this project stated, “Should any future transportation improvements from the Martinsville Southern Connector Study be implemented along the U.S. Route 220 corridor, they could be considered for incorporation into the overall I-73 corridor. However, this would require a separate evaluation and analysis of I-73.”

In essence, this could be considered an attempt to construct a new terrain highway (MSC) that pretty much has the same purpose and need of another on the books highway (I-73) that has been on hold for decades because there is no funding and a “Least Environmentally Damaging Practicable Alternative” (LEDPA) study, as requested by the Army Corps of Engineers, has never been completed. That LEDPA study could very well indicate that neither MSC nor I-73 as currently proposed are needed because the upgrade U.S. 220 alternative has never been properly considered. We are hard pressed to believe how building two new terrain highways both adjacent to the current U.S. 220 alignment can possibly be conceived as being the Least Environmentally Damaging Practicable Alternative of accommodating local and regional traffic.

The MSC project would remove the upgrading of U.S. 220 as a viable option on I-73, which has still not been ruled out as the LEDPA for I-73. Despite the hurried process of One Federal Decision, it does not supersede NEPA or Clean Water Act requirements.

Eastern and Western Corridors

While our position continues to be the “no-build on new terrain, fix U.S. 220” on its current location, we are puzzled about the ongoing proposed and shifting alignments along this stretch of U.S. 220. We would like the DEIS to go into detail and fully explore this. We reference I-73 as well as MSC since similar alternatives have been proposed for both projects and MSC could be incorporated into I-73.

In May 2001, the Commonwealth Transportation Board (CTB) chose a west of U.S. 220 route for I-73 along the U.S. 220 section being studied for the MSC. Then the next month, the CTB adjusted that route to avoid wetlands in Henry County/southern Franklin County. This June 2001 change shifted the alignment to the east of U.S. 220 along this MSC stretch.

A few years later in November of 2007, the Henry County Board of Supervisors passed a resolution requesting the CTB shift the alignment in Henry County. In June 2008, the CTB passed a resolution to evaluate the Henry County Alternative. In December 2009, the CTB directed VDOT to work with FHWA to complete the necessary steps to shift the Henry County alignment. In June 2011, the CTB passed a resolution to pursue shifting the alignment of I-73 to the Henry County Alternative. This shift moved the proposed route closer to Martinsville and closer to the current U.S. 220 alignment.

The MSC Study initially included alternatives east of U.S. 220 – closely resembling proposed I-73 alignments. According to the VDOT presentation, the eastern alternatives were dismissed because they would not meet the local and regional traffic needs. However, based on VDOT purpose and need and current approved alignment, the eastern route for I-73 apparently does meet these traffic needs.

Purpose and Need

The February 2011 EA for the I-73 Henry County Alternative (State Project: 0073-962-F01, PE-101; UPC No. 16596; Federal Project: NH-962-2 (004)) identified 5 components for the purpose and need of that project. Those included:

3. Improve operations, access, and capacity for vehicular and freight movement in the study area and to other locations between Michigan and South Carolina;
4. Enhance general mobility and transportation linkage in the study area and through the broader Michigan to South Carolina travel shed; ...

The Martinsville Southern Connector identified the following purpose and need as:

- Accommodate Regional Traffic
- Accommodate Local Traffic
- Address Geometric Deficiencies and Inconsistencies

So, roughly estimating, you now have proposals to construct a new terrain four-lane highway within .5 to 2 miles on the west side of the current U.S. 220 (MSC project) and on the east side of U.S. 220 (I-73 project). This makes no financial or environmental sense. Eight years ago it was concluded that an eastern route would satisfy local and regional traffic needs, but now an eastern route will not. Yet, the eastern route is still on the books for I-73.

Access Control

The Reconstruct/Fix U.S. 220 option was dismissed and not continued to the alternative phase, resulting in a situation where only fully access-controlled freeways on new alignment are being considered. According to the August 2019 VDOT video presentation, the level of access control will be evaluated and could change once the preferred alternative advances to the final design stage.

The exclusive focus on fully access-controlled freeways on new alignment at this stage of the study prejudices other alternatives, including that of fixing the existing U.S. 220 alignment using techniques being studied through VDOT's Arterial Preservation Program (**APP**).

The following information about **APP** was presented to the public at VDOT's July 19, 2018 Route 220 Preservation and Improvement Plan, Franklin County Input Meeting:

--U.S. 220 is part of the Corridors of Statewide Significance and the Arterial Preservation Network

--**APP** is an alternative to widening the U.S. 220 corridor that considers promoting the use of innovative transportation solutions, minimizing delays for through traffic, improving safety, and incorporating local economic development goals.

--**APP's** goal is to ensure that: (a) mainline through traffic is served with priority, and (b) safety is improved.

--**APP's** implementation strategies include: (a) integrating program priorities with local economic development goals; (b) improving access management; (c) eliminating unwarranted traffic signals; and (d) implementing innovative intersection configurations.

--**APP** offers improved safety, decreased travel time, and economic benefits in an environmentally responsible way.

--**APP's** geometric/operational improvements include improvements to geometry, control type, turn lanes, movement restrictions, signing, and marking at intersections and interchanges.

--Among the techniques used in **APP** is access management, which involves the location, spacing, and design of driveways, medians, median openings, traffic signals, and interchanges. Access management results in improved traffic flow, reduced congestion, and improved air quality.

--**APP's** safety improvement techniques include rumble strips, guardrails, paved shoulders, delineators, beacons, markings, and vegetation removal. These techniques improve sight distance, improve driver awareness, guide drivers more effectively, reduce conflict points, and improve driver compliance with traffic control devices and traffic laws.

We strongly urge VDOT to include among the alternatives being considered for the Martinsville Southern Connector an upgrade of U.S. 220 using the techniques being studied through APP. This alternative should be included to ensure that the Martinsville Southern Connector project is fully compliant with the U.S. Army Corps of Engineers' requirement for consideration of Least Environmentally Damaging Practicable Alternative (LEDPA).

Completion of Martinsville Southern Connector Should Prompt I-73 Dissolution by CTB

Ongoing and Planned improvements along U.S. 220 coupled with the MSC should prompt the CTB to officially abandon the I-73 build new-terrain alternative that has been financially dead from the get-go. After decades of residents living in limbo, VDOT and the CTB need to move on and remove this threat to property that has been hanging over people's heads. This will allow people and their property values to rebound.

It dissatisfies us to think that here we go again - albeit on a smaller scale – a much ballyhooed road project is presented yet there is no funding available. To think of another group of local citizens being left in VDOT limbo concerns us.

We strongly urge that the DEIS fully examine the cumulative impacts of proposed projects that are still on the books (I-73) along with the MSC. Any incorporation of MSC into the I-73 project needs to be considered and studied now, not years later.

Thank you for this opportunity to comment.

Respectfully submitted,

A handwritten signature in cursive script that reads "Mark E. Barker".

Mark E. Barker
Executive Assistant, BREDL

Cc:

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