



Charlottesville-Albemarle Metropolitan Planning Organization

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February 17, 2012

Chris Collins, Project Manager
Virginia Department of Transportation
Environmental Division
1401 East Broad Street
Richmond, VA 23219

Re: Route 29 Bypass, Agency Scoping

Dear Mr. Collins:

On January 27th 2012 the Charlottesville-Albemarle Metropolitan Planning Organization (MPO) received your letter requesting that our agency submit any comments and suggestions regarding important factors to be considered in the upcoming reevaluation of environmental studies of the proposed Route 29 Bypass Project (State Project No: 0029-002-844, P101; UPC No. 102419). We appreciate the opportunity to provide input on the scope for the proposed Environmental Assessment. During the process of adding the US29 Project to the MPO Constrained Long Range Transportation Plan and the Transportation Improvement Program the MPO conducted two public hearings. Over 160 people attended and spoke at those public hearings. In addition, we received over 500 comments, letters and emails during the public review period. We have reviewed the comments received from that input process and based on those comments would like to provide the following input for the scope of the environmental assessment.

- 1) Alternatives – Much of the input we received noted the large changes in the project area since the completion of the FEIS in 1993 and the SEIS in 2003 and called for consideration of alternatives. We recognize that many of the alternatives that were requested are beyond the scope of an environmental assessment. At a minimum, we request that a No-Build alternative and an Alternative that includes proposals from the joint VDOT/Albemarle County Places29 Transportation plan, should be studied.
- 2) Traffic – Many commenters during our input process noted the extensive changes in local traffic since the FEIS and SEIS were completed. It was also noted that the travel demand modeling used for the FEIS and SEIS assumed that interchanges would be included in the project at intermediate points and that the modeling had not been updated since the mid-1990's. Many of those providing input also noted that the original project concept called for a direct connection to the north end of North Free State Road/Meadow Creek Parkway extended. We believe that the traffic analysis should be completely updated including an analysis of the alternatives proposed above. We have supplied the most up to date version of the MPO travel demand model to be used in the traffic analysis. When the modeling is complete, prior to the release of the EA, we request that all input and output files for the travel demand model be provided to us for our review and validation.
- 3) Socioeconomic Conditions – Much of the input provided to the MPO concerned changes to land uses in the area surrounding the proposed project in the period since the FEIS and SEIS were completed. We believe this necessitates a complete update of the Socioeconomic Conditions section of the original FEIS, and complete update to the analysis of the Socioeconomic Impacts including relocation of residences and businesses, loss of Albemarle County tax revenue, and impact on community character and cohesion. In addition, an

environmental justice analysis should be conducted based on the recent guidance issued by the Federal Highway Administration.

- 4) Community Facilities – The proposed project will pass very near to several Albemarle County schools at the Albemarle County School Complex as well as the Agnor-Hurt Elementary School and the St. Anne-Belfield School. Many of those providing input to the MPO requested that an analysis be conducted of the impact of the expected traffic on the children at the schools based on the method developed by the Center for Disease Control. In addition, the project also passes near the Colonnades, a senior living center. The MPO received many comments requesting that the impact of the project on the residents of the Colonnades be assessed. Also, input to the MPO noted the presence of at least one church and possibly more that did not exist in 1993 and that may be within the area designated for project right of way. We request that the survey of community facilities and analysis of impacts to community facilities be completely updated for the Build Alternative.
- 5) Cultural Resources
 - a. Architectural Resources – The FEIS notes that the architectural evaluations were conducted in 1990, 1991 and 1992. Since 20 years have passed since the former evaluations, it is possible that structures are now eligible for the National Register of Historic Properties that were not eligible in the early 1990's. We request that the architectural evaluation be completely updated within ½ mile on either side of the build alternative in cooperation with the Virginia Department of Historic Resources.
 - b. Archeological Resources – We understand that Virginia Department of Transportation is considering altering the design for both the north and south end interchanges that were evaluated in the SEIS. If these changes will result in the disturbance of any additional land we request that appropriate survey's of archeological resources be conducted as part of the EA.
- 6) Air Quality – The air quality analysis based on the updated travel demand modeling for the proposed project and all alternatives should be conducted for ground level ozone, NO_x, CO and particulate matter. In addition, many of those providing input to the MPO requested that a greenhouse gas analysis also be conducted for the project.
- 7) Noise – The noise analysis for the proposed project should be completely updated. At a minimum this noise analysis should be based on the new travel demand forecasts and should include an up to date identification of sensitive noise receptors.
- 8) Water – Many of those providing input to the MPO were concerned about the impacts from the project to water resources and the water distribution system. Among the concerns expressed were the following:
 - a. South Fork Rivanna River Reservoir Watershed – The impacts on the South Fork Rivanna River Reservoir and its watershed should be updated from the analysis contained in the SEIS.
 - b. Water Distribution System – The impact of the project on the water distribution system should be assessed. In addition, it is our understanding that current plans call for a pipeline to connect the South Fork Rivanna River Reservoir and the Ragged Mountain Reservoir within or parallel to the US29 Bypass right of way. The analysis should also update the provisions in the SEIS for preventing the release of hazardous materials into the water distribution system from the proposed project.
 - c. Wetlands – Wetlands mapping has been considerably improved since the date of the previous FEIS. The wetlands analysis should be updated using the most recent available data sets from local, regional, state or federal sources.
 - d. Stormwater – The project stormwater analysis should also be updated based on the most recent stormwater requirements. This should include an identification of the stormwater facilities that will be necessary to fully mitigate expected stormwater from the project and associated impervious surfaces.
- 9) Hazardous Materials – Many people commented during the MPO process on the impact of potential spills of hazardous materials associated with the proposed project and particularly

the impact of hazardous materials on the South Fork Rivanna Reservoir and the water distribution system.

- 10) Bicycle and Pedestrian Considerations – Neither the original FEIS nor the SEIS identified bicycle and pedestrian accommodations that would be included in the proposed project. A number of commenters asked for bicycle and pedestrian accommodations as a part of the final project. It is our understanding that under current guidance the project sponsor must either provide appropriate bicycle and pedestrian accommodations in the project corridor or provide funding for bicycle and pedestrian accommodations on parallel alignments if it is not possible to provide such in the project corridor.
- 11) Indirect and Cumulative Effects – Members of the public as well as members of the MPO Policy Board have requested an analysis of induced growth that will result from development of the proposed project.

Thank you for giving TJPDC the opportunity to provide input on the scoping for the environmental assessment. Please feel free to contact me if you have any questions regarding our input.

Sincerely,



Stephen Williams
Executive Director, Thomas Jefferson Planning District Commission

Cc: MPO Policy Board
Irene Rico, FHWA Virginia Division Administrator
Ivan Rucker, FHWA Virginia Division Metropolitan Planner