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***PRESS RELEASE***

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**EPA has Environmental Objections with I-73 DEIS**

**Agency recommends a supplement to VDOT document**

Citing major concerns that were not addressed by the Interstate 73 Draft Environmental Impact Statement (DEIS), the U.S. Environmental Protection Agency has recommended a supplement to the DEIS be prepared to address significant issues.

In a letter to the Federal Highway Administration, the EPA expressed objections with the limited alternatives studied; the project's purpose and need; traffic projections; primary, secondary and cumulative environmental impacts; and air quality impacts in the Roanoke area.

The EPA says the I-73 DEIS failed to study an upgrade to the existing U.S. 220 and did not contain sufficient information to make an assessment which would justify the need to construct a new highway.

David Hurt of Virginians for Appropriate Roads said, ""The EPA's comments reinforce what's been obvious all along - I-73 is a sprawl developer's dream road that carries enormous fiscal, social, and environmental costs with little benefit for the public. The EPA's comments also expose VDOT's shameless bias towards a new-terrain highway by pointing out the complete lack of attention to 220 upgrades."

Gerry Slotnick of Friends of Franklin County stated, "TSM information wasn't even available at the public hearings, although detailed maps and glossy artist's conceptions were unveiled for every new-terrain option." Slotnick continued, "In short, the EPA is telling VDOT that I-73's negative impacts are clear and substantial, its benefits are questionable, and other options need to be examined."

The EPA assigned the I-73 DEIS a rating of “Environmental Objections (EO) Insufficient Information (2).” EPA rates each Environmental Impact Statement on the adequacy of the document to include sufficient information to make informed decisions.

The EO rating means the “EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative.) EPA intends to work with the lead agency to reduce these impacts.”

The Category 2 designation means “the draft EIS does not contain sufficient information for the EPA to fully assess the environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action.”

“The benefit of improved future traffic conditions does not appear to outweigh its environmental impacts,” commented EPA in the Jan. 12 letter. Regarding the VDOT Level of Service (LOS) projections for the year 2020, EPA said “this is a marginal improvement over the no-build condition. Moreover, since an upgrade of the existing Rt. 220 was not studied, the benefits of this type of facility improvement on LOS are not known.”

EPA further commented that the cumulative and secondary impacts from a new terrain I-73 have the “potential to be very significant” since between “61 percent and 76 percent of the land within one mile of each proposed new interchange is currently not planned for commercial or residential development.”

“In addition, this proposal will increase vehicle miles traveled in the study area by as much as 58 percent. This will result in additional pollutant loadings to the Roanoke Valley,” the letter stated.

Mark Barker of the Blue Ridge Environmental Defense League said, “We are pleased that EPA has recommended VDOT complete an emission analysis to assure the protection of Roanoke’s air quality and the visibility in the James River Face Wilderness Area. VDOT may not be concerned about Roanoke’s air quality, but we are.”

EPA also pointed out that the I-73 DEIS failed to study an upgrade to the existing Rt. 220 which “limits the range of alternatives considered and leaves many questions unanswered...”

If VDOT decides to ignore these recommendations, they will meet with the CTB to choose a preferred corridor for I-73 as early as May 17.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
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JAN 12 2001

Roberto **Fonseca-Martinez**  
Federal Highway **Administration**  
Virginia Division Office  
P.O. Box 10249  
**Richmond**, Virginia 23240-0249

Re: **Draft** Environmental Impact Statement (**DEIS**) for the proposed I-73 project; Franklin, Henry and Roanoke **Counties and the** City of Roanoke; southwest Virginia.

**Dear** Mr. Martinez:

In accordance with **the** National Environmental Policy Act (**NEPA**), and **Section** 309 of the Clean Air Act, the Environmental protection Agency (EPA) offers the following comments regarding the subject **DEIS**. **The** portion of I-73 covered by the **DEIS** is between 69 and 79 miles long and will cost between \$1.1 **and** \$1.3 billion. It is one segment of a **Congressionally-**designated National Highway **from** **Sault** Ste. Marie, Michigan to Charleston, **South** Carolina

EPA assigns this **project** and **document** a rating of Environmental Objections (**EO**)-**Insufficient** Information (2). **This** ED-2 rating is based on the potential **high** levels of environmental impact and the lack of an adequate range of alternatives **presented** in the document. A copy of EPA's rating system is enclosed for your information. The following major **concerns** capture the issues **that** resulted in this rating. These issues should be addressed as supplement to the **DEIS**.

The benefit **of** improved future **traffic** conditions does not appear to outweigh its environmental impacts. For example, the **best** performing Build Option, Option 2, shows **improvement** in the Level of Service (LOS) in the year 2025 for only six of the 28 locations studied and stabilizes **the** LOS at 17 of the 28 locations studied. This is compared to **an** improvement in LOS at **three** locations studied and stabilization of LOS of 17 locations by the year 2025 **with** the no-build. **This** is a marginal improvement over the no-build condition. Moreover, since an upgrade of the existing **Rt. 220** was not studied, the benefits of this type of facility improvement on LOS are not known.

The environmental impacts of this proposal are very large, ranging **from** 340 to 707 residential displacements, 22 to 147 business **displacements**, 2,063 to 4,391 **acres** of forest land **loss**, 1,203 to 2,241 acres of **farm** land loss, and 11.84 to 35.61 acres **of wetlands** loss. In addition, an increase in stormwater pollutant loadings (12% to 37%) over **the base condition** will

loss, 1,203 to 2,241 acres of farm land loss, and 11.84 to 35.61 acres of wetlands loss. In addition, an increase in stormwater pollutant loadings (12% to 37%) over the base condition will result. The proposed new facility is located in mountainous terrain and will necessitate a new crossing of the Blue Ridge Parkway, which is a National Park and is eligible for inclusion in the National Register of Historic places.

In addition, this proposal will increase vehicle miles traveled in the study area by as much as 58%. This will result in additional pollutant loadings to the Roanoke valley. Even though the proposed 8 Hour Ozone National Ambient Air Quality Standard (NAAQS) is currently not enforceable and the official attainment status designation for the Roanoke area is still to be made, we recommend performing an emission analysis to determine the impact of I-73's changes on this NAAQS. We also recommend an analysis be performed to assure that there are no violations of the 1 Hour Ozone, Particulate, and Nitrogen Dioxide (NAAQS) created by the changes to I-73 and an analysis to determine if visibility is impacted in the Class 1 protected James River Face Wilderness area.

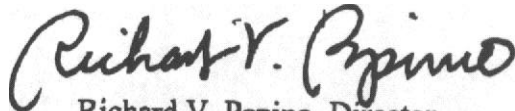
Cumulative and secondary impacts from this proposal have the potential to be very significant. Between 61% and 76% of the land within one mile of each proposed new interchange is currently not planned for commercial or residential development. With the introduction of this facility, these areas may be subject to increased development pressure, leading to the loss of additional natural resources in these areas. The effects of this induced growth on natural resources, water and air quality need to be assessed in a supplemental DEIS.

The purpose and need includes elements of safety, mobility, Congressional intent and economic development. This document does not convincingly demonstrate that a new interstate-style facility is the only alternative that will satisfy the purpose and need. The new interstate facility, known in the DEIS as a limited access freeway design, was selected as the preferred alternative partially on the basis of Congressional intent. This decision does not appear to be based on hard data that would demonstrate this is the only alternative that would meet the other elements of the purpose and need. Indeed, West Virginia chose the less-damaging controlled access design for their segment of I-73. Moreover, an upgrade of Rt. 220 was not studied in the DEIS. An upgrade of the existing Rt. 220 would fall in the scope of design and environmental impacts between TSM and new limited access freeway. The lack of an upgrade to the existing Rt. 220 limits the range of alternatives considered and leaves many questions unanswered regarding the functionality of such a road and its environmental impacts, which would presumably be less than that of a new facility at a new location.

In summary, the I-73 proposal has the potential to cause a large degree of environmental impact throughout the study area and its benefits on mobility do not appear to be commensurate with its capital and environmental costs. A potentially less damaging upgrade of Rt. 220 or a lesser design standard roadway was not studied. Given this finding, the EPA recommends a supplement be prepared to the DEIS that includes an upgrade to the existing facility and addresses the issues given above.

Thank you for the opportunity to comment on this document. Should you have any questions regarding our comments, please do not hesitate to **call** Peter Stokely at (703) 648-4292.

Sincerely,

A handwritten signature in dark ink, reading "Richard V. Pepino". The signature is fluid and cursive, with the first name "Richard" and last name "Pepino" clearly legible.

Richard V. Pepino, Director  
Office of Environmental Programs

## I-73 DEIS Supporting Comments:

### Purpose and Need

Page 1-1: The new statement found in this section that was included in the **pre-draft EIS** regarding the clear congressional **intention** that this may be an interstate design standard needs to be cited. Exactly what legislation and amendments are being referred to? An excerpt from it would be helpful.

Page 1-10: The **trend in the loss of jobs** is clear but what is not clear is the reasons **why** these jobs **were** lost and if the lack of transportation contributed to this and if new road construction would help. **This** issue needs further clarification. This confusion is added to by the fact that several businesses have **either indicated they** would expand or locate in the study area. **Were** these decisions based on the **expectation of a new I-73**?

### Alternatives

Page 2-6: The discussion **regarding the differences between controlled** and limited access design should include the point that both controlled and limited access highways can and do receive new intersections which can degrade **their** performance. A recent example of this is **the** 234 by-pass intersection with I-66 in Prince William County, this interchange has severely degraded the performance of I-66 during peak hours. Similarly the limited access design would also require frontage roads where it is on **the** location of existing Rt 200.

Also on this page is a statement **that the limited access** design was **chosen** in accordance **with** the documented purpose and need and congressional intent. The purpose and need section, **with the** exception of the congressional intent portion, does not indicate that a limited access design standard is needed to meet the various other aspects of the purpose and need.

2-9: The discussion on this page regarding **the** 1994 VEC study states this study illustrated the ability of Interstate type improvements to generate expansion in the service industry. Yet when this report is discussed on pages 1-7 and **1-8** no mention of the style of road that was used to **make** these assumptions is given. It **is** implied this is a corridor study and the interchanges could be controlled access as well **as** limited access.

What **were** the findings, if any, of the Economic Impacts of I-73 on the City of Roanoke, February 2000 ? The study is mentioned in the text but no conclusions if there are any, were **presented** in the document.

Page 2-10: Table 2.3-1 :

These travel times seem to over estimate the benefit of the proposed I-73.. For **example** the trip from VA to Charleston SC using the 60 mph assumption in this study indicates the distance between these cities to be 292 miles. The current distance is 340 miles, to make the 340 mile trip in 4.86 hours the average speed would have to be 70 miles per hour. Likewise **to** travel the current distance from Flint **MI** to Roanoke VA in the **projected** 9.01 hours would require an average speed of 67.7 mph. Furthermore, the travel times from Ohio and Michigan assume and interstate facility the entire distance, an inaccurate assumptions because **WVA** is not building their section to interstate standards. These figures should be reexamined or further explained.

#### Build Alternative:

Page 2-29: No alternative falling in scope between the TSM and **freeway** style alternative was developed. This lack of a range of alternatives will limit the public and others ability to make informed decisions that balance cost, environmental impacts and economic development potential. For example the TSM alternative, although it includes dozens of items, is not a full upgrade of the existing Rt. 220 to an access controlled facility. Such an upgrade of the existing Rt. 220 which may provide the safety and mobility aspects outlined in the purpose and need at **far** less cost and impact. The justification for not including this type of alternative is found on page 2-47, but is not backed up with any factual data or by the **purpose** and need. Therefore it remains unclear **how** much of the purpose and need could be **addressed** by an upgrade of the existing Rt 220 to less than **freeway** standards. This type of alternative may have less environmental impact than a new interstate. A Rt 220 upgrade alternative should be developed in a supplement to the DEIS so the public and others can make a **fully** informed decision regarding the RT 220 corridor.

#### Affected Environment

##### Air Quality

The DEIS mentions mesoscale analysis appropriate type study for hydrocarbons and ozone precursors yet this type of analysis was not performed. Although 40 CFR Part 93.

"Transportation Conformity Rule Amendments: Flexibility and Streamlining; Final Rule," does not mandate the following recommendations we believe that it would be prudent to:

- Perform an **analysis** to assure that there are no violations of **the** 1 Hour Ozone, Particulate, and **Nitrogen** Dioxide National Ambient Air Quality Standard (**NAAQS**) created by the changes to I-73.
- Perform an analysis to determine if visibility is impacted in the Class 1 protected James River Face Wilderness area.

Finally, even though the proposed 8 Hour **Ozone NAAQS** is currently not enforceable and the **official attainment** status designation for the Roanoke area is still to be made, we recommend **performing an emission analysis to determine the impact of I-73's changes on this NAAQS.**

#### Environmental Consequences

The purpose and need includes elements of **safety**, mobility, congressional intent and economic development. While **each** on of these is relatively easy to understand, no where does this document prove that a new **interstate style** facility is the only **alternative** that will satisfy any portion of the purpose and need **other than** congressional **intent** for a now interstate facility.

#### Traffic

Page 4.1-2 : The text references **existing traffic** conditions but there is no Table included in this section that shows existing **traffic** conditions.

Table 4.1.1 indicates that, with **the** exception of Options **2,3,4** in the northern portion of Rt 220, that overall the Options do **little** relieve the **modest** levels of **traffic** Rt 220, and till significantly increase **traffic** on RT 81 and 581 over **the** no-build.

Table 4.1.3 shows a, similar finding, and **additionally** shows that the no-build improves or stabilizes **traffic** conditions at 20 of **the** 28 locations studied over **the** 1997 levels. Where the **no-build** fails to improve or stabilize those conditions, the Build Options only show improvement for a maximum of 4 of **the** 28 locations studied. The **best performing** build alternative, Option 2, stabilizes or improves 23 of **the** 28 locations studied, compared to 20 **with** the no-build.

From examination \$2020 Level of **Service** data contained in Table 4.1.3 and 4.1.4 it can be **seen** in **the northern portion** of **the** study **area there** are two critically **failing** areas of roadway after the no-build is implemented, I 581 between Rt's 11 and 460, **Rt 220 from** Rt 24 to Wonju St. **None** of **the** Build Options show **any** improvement to the Rt 220 section over **the no-build** and **even** with Build Options the I 581 sections **is** still failing.

In the **Southern portion of the** study **area US** Rt 221, Rt's 121, Rt 57 and Rt 40 show deteriorating conditions **with the** no-build. None of the Options improve **the** Rt 221 or the Rt 57 west of Rt 220 problem and only two areas of improvement can be found in the other problem areas with any of the Options.

Table 4.1. I2 Vehicle Miles Traveled, shows that each of the build stleniatives **increase** VMT from 28% to 58% in the study area

Table 4.1.15: Accident Data shows that significant reductions in the accidents along Rt 220 are likely with **the** build options. Two points need to be made regarding this important finding. First it is not clear if these **numbers** include forecasted accidents on the Options themselves and two, since an upgrade of existing RT 220 was not included there is now way to know **what** improvements to **the accident** rate this would achieve.

#### Air Quality:

A big question with this project is the effect of increasing VMT in the study area. Each of the Options increase VMT in **the** study area over the no-build alternative. The range of increase is **from** 28% to **58%**, depending on **the** Option chosen. This increase is not evaluated in the air quality portion of this chapter. It is not clear what this **increase** will mean regarding the current



National Ambient Air **Quality Standards** (NAAQS). In addition, new standards for **ozone** have **been** established by EPA (1997 new **8-hour** standard for ozone). Based on existing monitoring data, portions of this study area **will** not currently pass this new **standard**. With an increase of 12% to 37% more **VMT** each day what will be effect be on both the old standard and the new **standard**?

#### Secondary and Cumulative Impacts:

Page 4.12-1: Please include the existing and future **land** use maps in **the** FEIS. And explain how this magnitude of growth can be supported at these locations without I-73. This should be explained for each interchange where this growth is expected to **occur**.

Page 4.12-3: It is stated in the **DEIS** that between 24% **and** 39% of the land within one mile of the proposed interchanges is **already** planned for **growth**. This raises several questions that need to **be addressed** in the FEIS. Which **interchanges** make up **this** total and what is the break down at each interchange or existing and **future** development? **The** remainder of the land between 6 1% and 76% of the area is not already **planned** for **development** then **this** is the area that needs to be focused on for secondary development potential. A break down of the existing land **use/land** cover types and the **impacts** within one mile of these interchanges should be **given**. **The** potential non-point and point source **pollutant** loadings from the expected or predicted growth scenarios should be determined.

Define the acronym **BRP**.