



December 16, 2015

Mr. Drew Joyner, PE
Human Environment Section
NCDOT Project Development & Environmental Analysis
1598 Mail Service Center
Raleigh, North Carolina 27699-1598

Dear Mr. Joyner:

Enclosed, for your review and consideration, are the staff comments regarding the I-26 Connector Project DEIS that was released on October 16, 2015. The staff comments are divided into four sections; specifically, general comments, section A comments, section B comments, and section C comments.

Although all of staff's comments are important and worthy of serious consideration, I would like to highlight some of them as follows:

- The City of Asheville strongly encourages the NCDOT to implement complete streets elements along all of the -Y- lines including the bridges that cross the -L- line throughout the entire project length for all sections (General Comments).
- The City of Asheville strongly encourages the NCDOT to make all efforts to minimize the overall footprint throughout the entire project length for all sections with the use of additional retaining walls and additional urban design strategies to make sure that all of the on/off ramps are placed as close to the -L- line as possible (General Comments).
- The City of Asheville strongly suggests that NCDOT create a collaborative working group that would meet regularly starting in early 2016 and throughout the design phase to ensure adequate consideration of the City's concerns. (General Comments).
- The City of Asheville strongly encourages the NCDOT to redesign Amboy Road (-Y4-) to be consistent with the City's ongoing project with a design speed no greater than 40 mph (Section A Comments).
- The City of Asheville strongly encourages the NCDOT to minimize as much traffic on the Jeff Bowen Bridges as possible in order to extend the life of the two existing bridges (Section B Comments).

City Council approved resolution # 15-232 on December 8, 2015 (see enclosed copy) regarding the need to reduce the overall size and impact of the project and to improve community connectivity through inclusion of complete streets elements, analyzing the travel demand model and capacity analyses for a

six-lane alternative, creating a collaborative working group to include City appointees and NCDOT design professionals, endorsing Alternatives 4 and 4B for Section B, and endorsing Alternative F1 for Section C.

Please let me know if additional information is needed.

Respectfully,

A handwritten signature in black ink, appearing to read "Ken Putnam", written in a cursive style.

Ken Putnam, PE
Transportation Department Director

KJP/

Enclosures

cc. Mr. Gary Jackson

I-26 CONNECTOR DEIS REVIEW

General Comments

- The City of Asheville's City Council approved a resolution adopting a complete streets policy on June 26, 2012 (Resolution # 12-154). NCDOT adopted a similar policy during July 2009. In order to be consistent with these policies, the City of Asheville strongly encourages the NCDOT to implement complete streets elements consistent with design guidelines published by the National Association of City Transportation Officials (NACTO) along all of the -Y- lines including the bridges that cross the -L- line throughout the entire project length for all sections. As the -Y- lines are streets that are generally local in nature, the City of Asheville strongly encourages collaborative planning throughout the design and construction phases.
- The City of Asheville has committed \$2,000,000 of co-funding to the I-26 Connector project in order to ensure that local needs are met.
- The City and County approved a joint resolution regarding the I-26 Connector on March 18, 2014 (Resolution # 14-54 and # 14-03-12). The resolution included the following quote, "...in preparation of the draft Environmental Impact Statement for the project, NCDOT clearly include elements that will address community needs for sound barriers and bicycle, pedestrian and neighborhood connections, including location, design, and the funding methodology of associated infrastructure elements." The City of Asheville strongly encourages NCDOT to fully address these elements in the Final EIS document.
- Now that the City of Asheville (and other cities throughout North Carolina) is limited in the ability to annex, the City's geographical area has now become finite and as a result, land is more valuable to the City's tax base and is necessary for downtown infill redevelopment especially along Patton Avenue east of the Jeff Bowen Bridges. Therefore, the City of Asheville strongly encourages the NCDOT to make all efforts to minimize the overall footprint throughout the entire project length for all sections with the use of additional retaining walls and additional urban design strategies to make sure that all of the on/off ramps are placed as close to the -L- line as possible. Design exceptions should be considered in cases where greater land preservation would result. The City of Asheville would like to be involved in discussing these suggestions during the design phase.
- Summary, Page xi, it states that "NCDOT policies prescribe that certain pedestrian improvements require partial funding by and formal requests from the local governments; therefore, until a preferred alternative is selected, it cannot be definitively determined what elements will be included in the final design of the project." The City of Asheville is very interested in assuring the best possible pedestrian and bicycle improvements and would like to be actively involved in the design phase of the project regarding the pedestrian elements after a preferred alternative has been selected. This involvement is critical in order for the City of Asheville to conduct its own transportation and financial planning.
- The City of Asheville's preferred sidewalk cross-section includes a 5-foot sidewalk and a 5-foot utility strip (buffer area) with a 10-foot overall width. The City of Asheville strongly

encourages this cross-section at all sidewalk locations throughout the entire project length for all sections. If the preferred sidewalk cross-section cannot be provided in specific areas, a reduced-width utility strip should be considered, and if that is not possible, then a 6-foot back of curb sidewalk should be used.

- The City of Asheville strongly encourages the NCDOT to consider wider (6') minimum bicycle lane widths along roads with traffic volumes greater than 10,000 vpd and/or operating speeds greater than 35 mph to be consistent with the City of Asheville Standard Specifications and Details Manual, City of Asheville Comprehensive Bicycle Plan, and NACTO recommendations. In addition, The NC Bicycle Facilities Planning and Design Guidelines (1994), calls for a preferred bicycle lane width of 5' or greater. It recommends additional width "where substantial truck traffic is present, where prevailing winds are a factor, on grades, or where motor vehicle speeds exceed 35 mph. (p 31)" As do other guides, the NC Bicycle Facilities Planning and Design Guidelines shows bicycle lane width measured exclusive of gutter, and shows a minimum 2' gutter area in Figure 5-2 (p 32).
- The City of Asheville strongly encourages the NCDOT to consider multi-use paths to measure 14-16 feet wide with an absolute minimum width of 12 feet.
- The City of Asheville would like to be actively involved in the Aesthetics Advisory Committee (AAC) in order to help integrate aesthetics features into the proposed design after a preferred alternative has been selected and final design begins. Retaining walls should include aesthetics standards consistent with the City of Asheville Standard Specifications and Details Manual.
- The City of Asheville strongly encourages reasonable mitigation strategies, including funding, for transit, pedestrian, and bicycle routing during the construction phase.
- The City of Asheville strongly encourages the NCDOT to include bus stops along all of the transit routes within the project limits. These bus stops must be designed and constructed to meet ADA requirements.
- The City of Asheville would like for the NCDOT to consider "bus on shoulder system" to be authorized within the project limits.
- The City of Asheville strongly suggests that NCDOT create a collaborative working group that would meet regularly starting in early 2016 and throughout the design phase to ensure adequate consideration of the concerns listed above. This group could also examine the travel demand model, capacity analysis, and the methodology of calculating Level of Service in an effort to gain consensus.
- The City of Asheville is pleased that NCDOT will be using the new local travels demand model to re-examine travel demand and to conduct a new capacity analysis with a 6-lane alternative in Section A.
- Maps included in the DEIS do not seem to indicate the placement of sound walls as were indicated in earlier versions. The City of Asheville would like more information about the placement and sufficiency of sound walls, and assurance that sound walls will be fully included in the Final EIS.

- The City of Asheville strongly encourages NCDOT to update all of the base maps in the final EIS in order to reflect construction activities (new homes and businesses) that have occurred during the past several years.

I-26 CONNECTOR DEIS REVIEW

Section A Comments

- The City of Asheville strongly encourages that an updated Travel Demand Model for the project be developed as quickly as possible to assess a scenario for six lanes through Section A, that the analysis in the six-lane scenarios carefully avoid assuming induced-demand levels associated with an eight-lane design, that the analysis include the resulting impact of six lanes on Section B and Section C, and that final design of the project include the fewest number of lanes and smallest footprint possible through the A, B, and C Sections of the project.
- The Haywood Road bridge (-Y6-) and associated intersections do not seem to include complete streets elements as indicated by the public hearing corridor maps. The City of Asheville strongly encourages the NCDOT to include complete streets elements consistent with NACTO guidelines on the subject bridge and through the intersections and to make all efforts to make the bridge and intersections as pedestrian and bicycle friendly as possible especially since a proposed greenway (multi-use transportation path) will be located in the northeast quadrant. These elements should include a minimum sidewalk width of 6 feet measured back of curb, bicycle lanes, reduced lane width and intersection dimensions, and reduced radii at the on/off ramps.
- The City of Asheville would like to explore (with the NCDOT) the possibilities of constructing buildings on the Haywood Road bridge in an effort to maintain connectivity as a business corridor through West Asheville.
- Amboy Road (-Y4-) is indicated as a four-lane facility. The City of Asheville strongly prefers that Amboy Road be designed as a two-lane facility, possibly with wider intersections for turn lanes, in order to reduce the footprint of the entire project and the taking of property, to make it more compatible with adjoining neighborhoods, to make Amboy Road more bicycle and pedestrian-friendly, and to reduce project cost, even if it means achieving level-of-service E for that section of Amboy Road.
- Amboy Road (-Y4-) is not pedestrian and bicycle friendly with the proposed 4-lane cross-section which is recommended simply to match the proposed design for project # U-4739. The City of Asheville is currently designing a project identified as RADTIP which is a complete streets project along Lyman Street/Riverside Drive from Amboy Road (near the French Broad River) to Hill Street. Construction will begin during Calendar Year 2017. The proposed cross-section along the southern section of the project includes two travel lanes, sidewalks, a greenway (multi-use transportation path), and a protected two-way bikeway (1 bicycle lane in each direction). In addition, the 2040 Metropolitan Transportation Plan (MTP) no longer recommends major widening for project # U-4739 but instead recommends spot widening, roadway modernization and access management with complete streets elements. The City of Asheville strongly encourages the NCDOT to redesign Amboy Road (-Y4-) to be consistent with the City's ongoing project with a design speed no greater than 40 mph.
- The typical cross-section for Amboy Road (-Y4-) between NC 191 (Brevard Road) and I-26 does not provide enough width for the City's preferred sidewalk cross-section. The

City of Asheville strongly encourages the NCDOT to design and construct the preferred sidewalk cross-section.

- The City of Asheville greatly appreciates the inclusion of the West Asheville Greenway from Haywood Road across the Jeff Bowen Bridges, and to Clingman Avenue. The City of Asheville anticipates that this facility will be very heavily used by bicycle commuters, recreationists, pedestrians, and visitors. Given the anticipated high usage levels, the City strongly encourages that this Greenway, as with all greenways reflected in the DEIS, should reflect the AASHTO and National Association of City Transportation Officials (NACTO) design standards, which would result in a greenway that is roughly 14-16 feet wide to safely accommodate bikes, and would also include appropriate shy-distance from any barriers, consistent with AASHTO guidelines and NACTO guidelines. Additionally, the path should be marked with 2-way bicycle and pedestrian lanes.
- The proposed closing of Hanover Street at its intersection with Haywood Road adversely impacts transit routes W1 and W2 regarding its service to the Pisgah View Apartments (a public housing complex).
- The City of Asheville strongly encourages the NCDOT to include bicycle/pedestrian infra-structure at the beginning/end of the Hominy Creek Greenway at Hominy Creek Road.
- The City of Asheville is concerned about the impact to the French Broad River Greenway during the construction of the proposed retaining wall.
- The City of Asheville would like the opportunity to collaborate with NCDOT on the design for the new interchanges at Brevard Road and Amboy Road in order to identify opportunities for urban design strategies and the possible use of roundabouts.

I-26 CONNECTOR DEIS REVIEW

Section B Comments

- The City of Asheville greatly appreciates the inclusion of the West Asheville Greenway (identified as # 20 on the City of Asheville Greenway Master Plan that was adopted on November 12, 2013) from Haywood Road to the eastern end (Asheville side) of the Jeff Bowen Bridges. There is a section of the West Asheville Greenway that intersects with Hazel Mill Road which then follows Hazel Mill Road and the Craven Connector before it ties back into the Jeff Bowen Bridges. The City of Asheville strongly encourages the NCDOT to keep the West Asheville Greenway "running" parallel to the C/A fence and the -Y7- EBL in order to avoid the 18%+/- vertical grade along Hazel Mill Road and to be routed underneath, via culvert, any street crossings in its path. This greenway, as with all greenways reflected in the DEIS, should reflect the National Association of City Transportation Officials (NAACTO) design standards, which would result in a greenway that is roughly 14-16 feet wide, plus necessary shy distance from barriers, to safely accommodate bikes and pedestrians. The City of Asheville strongly encourages that this greenway be extended southward to connect to the French Broad River Greenway and that it be extended eastward to connect with Clingman Avenue.
- The City of Asheville strongly encourages the inclusion and construction of the Emma Greenway (identified as # 7 on the City of Asheville Greenway Master Plan that was adopted on November 12, 2013), the Montford Greenway (identified as # 14 on the City of Asheville Greenway Master Plan that was adopted on November 12, 2013), and the Smith-Mill Creek Greenway (identified as # 17 on the City of Asheville Greenway Master Plan that was adopted on November 12, 2013). The City of Asheville notes that there appears to be the opportunity to "daylight" Smith-Mill Creek as it runs through the project area and the City of Asheville strongly encourages NCDOT to pursue that option. If these greenways are not constructed, the opportunity for construction in the future might not be possible.
- The City of Asheville is concerned that there is no direct access to Haywood Road from I-26 eastbound under alternatives 3 and 3C which might encourage that traffic to go to the Amboy Road interchange using NC 191 (Brevard Road) and other neighborhood city-maintained streets (Virginia Avenue and Fairfax Avenue) to gain access to Haywood Road. The proposed access requires vehicles to travel through four signalized intersections before reaching Haywood Road.
- The City of Asheville is concerned about the adverse impact that Alternatives 3 and 3C will have on the long-term viability of the Westgate Shopping Center including the impact of a new hotel currently under construction at the same location that -Y71- will terminate.
- The City of Asheville is concerned about the adverse impact that Alternatives 3 and 3C will have on the Burton Street Community. Regardless of the alternative chosen, the City of Asheville strongly encourages a collaborative planning process to identify opportunities to reduce the overall footprint of the project.
- The City of Asheville strongly encourages the NCDOT to minimize as much traffic on the Jeff Bowen Bridges as possible in order to extend the life of the two existing bridges.

- The City of Asheville is concerned that Alternatives 3 and 3C will not completely eliminate the existing weaving maneuvers and congestion on the Jeff Bowen bridges.
- The City of Asheville is concerned about the adverse impacts to business and industrial sites with Alternatives 3 and 3C along the French Broad River.
- The City of Asheville is concerned that Alternatives 4 and 4B will adversely impact Hill Street, Isaac Dickson Elementary School, and Riverside Cemetery and as a result, the City of Asheville strongly encourages the NCDOT to minimize the impacts.
- The City of Asheville strongly encourages continuous sidewalks along both sides of Patton Avenue from the west side of the French Broad River to Clingman Avenue for Alternatives 4 and 4B.
- The City of Asheville strongly encourages the NCDOT to use complete streets elements along Patton Avenue with Alternatives 4 and 4B in order to improve neighborhood connectivity and accommodate pedestrian-scale urban redevelopment.
- The City of Asheville strongly encourages the NCDOT to improve access to the Hillcrest Community.

Pros and Cons

Alternatives 3 and 3C

Pros

- Lower overall cost compared to Alternatives 4 and 4B

Cons

- Does not separate local and interstate traffic (weaving maneuvers and traffic congestion on the Jeff Bowen bridges not eliminated).
- Adverse impacts to the Burton Street Community.
- Adverse impacts to the Westgate Shopping Center (including a new hotel currently under construction).
- No direct access to Haywood Road for I-26 eastbound vehicles.
- Increase delays to traffic flow along Patton Avenue (both directions) due to increased number signalized intersections.
- Traffic congestion along local surface streets increases.
- Leaves significant roadway deficiencies including weaving maneuvers along the Jeff Bowen Bridges.

Alternatives 4 and 4B

Pros

- Separates local and interstate traffic (creates a gateway into downtown Asheville).
- Minimizes traffic volumes on the Jeff Bowen bridges; therefore extending the life of the bridges.
- The existing bridge(s) could accommodate the multi-use transportation path without widening or constructing a new bridge.
- Improved transit service between downtown Asheville and West Asheville (more direct and faster travel times).
- Consistent with adopted City master plans.
- Creates opportunity for new access between the Hillcrest Community and Patton Avenue.
- Creates opportunities for redevelopment.

Cons

- Higher overall cost compared to Alternatives 3 and 3C.
- Adversely impacts Hill Street, Isaac Dickson Elementary School, and Riverside Cemetery.
- Additional visual and environmental impact of the bridges crossing the French Broad River.

I-26 CONNECTOR DEIS REVIEW

Section C Comments

- Will project # I-4759 (proposed Liberty Road interchange) not provide much needed relief regarding traffic congestion at I-40 Exit # 44, and if so, could the overall footprint of Section C be reduced? The City of Asheville questions the additional investment in the collector-distributor ramps shown along I-40 west of I-26. These ramps would take a significant number of homes and would not resolve the congestion at Exit #44 but simply move it to a new location. Making this additional investment in this location makes the previous widening here appear excessive and may call into question the need for the proposed Liberty Road interchange (Project # I-4759), which was proposed to help relieve congestion at Exit #44. The new collector-distributor ramps on the south side of I-40 seems a significant new investment to address something that is not clearly a current problem.
- If NCDOT moves forward with the collector-distributor ramps, the City of Asheville suggests that it consider an additional exit ramp from I-40 westbound onto Smoky Park Highway eastbound at Exit # 44 in order to relieve congestion at the existing ramp.
- If NCDOT moves forward with the collector-distributor ramps, the City of Asheville strongly encourages the NCDOT to minimize the overall footprint for Section C at and near Exit # 44 by using retaining walls and keeping the separation between the collector-distributor ramps and the -L- line as narrow as feasibly possible.
- Alternative F1 appears to be the best alternative for Section C as it minimizes the footprint and cost.
- The City of Asheville is concerned about the need to widen I-40 east of the Brevard Road interchange since there is no data to support the proposed widening and it adds significantly to the cost.
- As a general matter, if there is an additional \$100,000,000 to spend on this project, the City of Asheville would prefer those additional investments be made in Section B rather than in Section C.

RESOLUTION NO. 15-232

RESOLUTION REGARDING THE NORTH CAROLINA DEPARTMENT OF TRANSPORTATION I-26
CONNECTOR TIP PROJECT-2513

WHEREAS, the North Carolina Department of Transportation ("NC DOT") has issued a Draft Environmental Impact Statement ("DEIS") for the I-26 Connector Project, TIP Project I-2513 ("the project"); and

WHEREAS, NCDOT is seeking public input on the DEIS and held a public information session and hearing on November 16, 2015; and

WHEREAS, the City of Asheville is providing comments to NCDOT on the DEIS through a letter and this resolution; and

WHEREAS, the I-26 and I-240 corridors are critical to local and regional residents, visitors, interstate travelers, and regional commerce; and

WHEREAS, traffic congestion and safety are continuing challenges along I-240 and I-26 through Asheville; and

WHEREAS, improvements to the I-240 and I-26 corridors should be minimally impactful to the local community and should enhance the quality of life for residents and the quality of experience for visitors wherever possible; and

WHEREAS, NC DOT has been responsive to input from the City of Asheville and Buncombe County by including new bicycle and pedestrian facilities in the DEIS; and

WHEREAS, the NC DOT has committed to run the new, local travel demand model and undertake a capacity analysis that considers a six-lane alternative for Section A and has stated that fewer lanes would be built if these analyses demonstrate fewer lanes would be sufficient; and

WHEREAS, members of the community have expressed at the November 16 public hearing and through letters their strong preference for a project that addresses current congestion and safety problems but also one that is smaller overall, better reflects the character of Asheville, incorporates additional bicycle and pedestrian facilities, and minimizes harm to the affected neighborhoods of West Asheville, Burton Street, Emma, and Montford; and

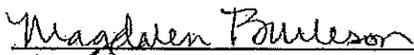
WHEREAS, the City of Asheville seeks a closer working relationship with NC DOT on the ongoing design of this project to ensure its impacts are minimized;

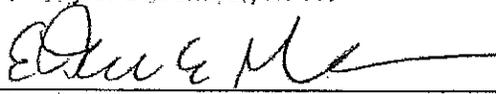
NOW THEREFORE BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF ASHEVILLE THAT:

1. The City of Asheville calls on NC DOT to use any and all tools at its disposal to reduce the overall size and impact of the project on Asheville's neighborhoods and businesses and to improve community connectivity through inclusion of additional bicycle and pedestrian elements required by NC DOT's Complete Streets policy, reflected in adopted City plans and policies, and referenced in the December 9, 2015, cover letter and December 8, 2015, Memorandum from the City of Asheville, both of which are specifically incorporated herein by reference.

2. The City of Asheville further calls on NC DOT to analyze in both the travel demand model and the capacity analysis a six-lane alternative in Section A (the West Asheville section) coupled with four lanes for I-26 in Section B (the bridge section) and to construct as few lanes as possible to address safety and congestion.
3. The City of Asheville further calls on NC DOT to partner with the City in creating a collaborative working group of City appointees and NC DOT design professionals that will meet regularly starting in early 2016 and throughout the design phase to:
 - a. minimize the project's size and impact, which will provide community benefits and reduce cost
 - b. ensure adequate consideration of the concerns listed in the City's comment letter
 - c. analyze the travel demand model, capacity analysis, and the methodology of calculating Level of Service in an effort to gain consensus on these foundational elements of the project.
 - d. identify opportunities to return land around the project to productive, tax-generating use and to ensure land on the east side of the river under any new bridges is put to use in a way that enhances the riverfront.
 - e. identify opportunities to repair or redress impacts of previous transportation projects on neighborhoods and businesses.
4. In order to provide the most benefit to the Asheville community while also accommodating through traffic, and for all the reasons stated in the City of Asheville's comment letter, the City of Asheville endorses Alternatives 4 and 4B for Section B and calls on NC DOT to further minimize the size and scale of these alternatives, particularly the impacts on the Burton Street Community, the impacts of Alt. 4 on the Emma Community, and the impacts of Alt. 4B on the Montford Community. Following completion of the new travel demand model and capacity analysis and focused exploration with NC DOT of options to reduce the overall size and impact of the project, the City of Asheville anticipates being able to endorse a single alternative but, in the absence of additional information, is not able to do so at this time.
5. The City of Asheville endorses Alternative F1 for Section C (I-40/I-26/I-240 interchange) in order to minimize the footprint and cost, while achieving the primary objective of creating full movement between interstate highways. For the reasons cited in the City's comment letter, the City of Asheville does not endorse the increased expense associated with the proposed collector roads and widening of I-40 east of Brevard Road.

Read, approved and adopted this the 8th day of December, 2015.


City Clerk


Mayor

Approved as to form:


City Attorney