

Appendix K. Public and Agency Comments and Responses

Appendix K contains comments on the draft conformity report and responses to these comments. Each commenter is assigned a code and each comment a number. Responses follow each comment. In certain instances, the respondent may insert italicized, bracketed wording to clarify the comment, using the format *[clarifying comment]*. An example would be where a commenter refers to “the 2035 LRTP” when the comment addressed one of the specific 2035 Long Range Transportation Plans covered by this conformity report; in this example, the comment would be edited to read: “the *[Durham-Chapel Hill-Carrboro MPO]* 2035 LRTP.” Except as noted by these italicized, bracketed comments, no changes were made to the comments as received. Comments submitted in digital formats may have altered formats from the original due to the mechanics of importing and combining these files in this appendix.

Comments were addressed in the order that they were adopted or endorsed by the submitting organization, or received at the offices of the Triangle J Council of Governments, which worked with the Triangle Air Quality Conformity partner organizations to coordinate the responses to the comments.

The following organizations and individuals submitted comments on the draft conformity report:

1. Federal Highway Administration (FHWA)
Comment document prepared by Edward Dancausse and dated April 9, 2009
2. U.S. Environmental Protection Agency, Region IV (EPA)
email from Amanetta Wood to Eddie Dancausse, FHWA, April 16, 2009
3. NC Division of Air Quality (DAQ-HJH)
email received from Heather Hildebrandt at TJCOG on April 16, 2009

The following organization indicated that staff had reviewed the report and had no comments at this time:

1. Federal Transit Administration (FTA)
email from Boyd Melton, FTA to Eddie Dancausse, FHWA, April 20, 2009.

As part of the preparation of the draft conformity report, the MPOs coordinated with state and federal agencies on the list of regionally significant and exempt projects. Correspondence related to that review is included at the end of Appendix K.; the responses were incorporated into the project list that was part of the draft report.

Federal Highway Administration (FHWA)

FHWA1:

Include the conformity process schedule in Appendix C.

Response:

The conformity process schedule has been added to Appendix C.

FHWA2:

Replace Appendices D5, D6 and D7 and just have one Appendix D5 with the files provided in the email: (TIP info for Triangle LRTP.012609.pdf and Clarification on rural projects out of the 09-15STIP 4.13.09.txt). The reason for this is the projects provided in the above mentioned files shows the actual rural area projects that were modeled for this conformity process (thus representing the “dount/rural area projects from the 09-15 STIP) and not the complete listing of 09-15 STIP projects shown in appendices D5, D6 and D7.

- Also make adjustments in the CDR where there is reference made to these appendices (i.e., page 16).

Response:

A new Appendix D5 showing only those projects included in the analysis has replaced the Appendix D5, D6 and D7 lists in the draft report.

FHWA3:

Provide a file in Appendix D and call it the BG MPO Project List. Place a statement in that file that mentions that the 2035 BG MPO does not have any projects in their portion of Orange County.

Response:

A new Appendix D6 has been added called Burlington-Graham MPO Project List. The Appendix consists of a statement indicating that the portion of Orange County within the jurisdiction of Burlington-Graham MPO contains no new projects.

FHWA4:

Appendix D1: DCHC and CAMPO Highway Projects: Modify the project list to show projects by the following horizon years: 2015, 2017, 2025, and 2035. The project list is currently showing project completion dates of 2009, 2010, 2011 and 2020. This is confusing.

Response:

The project list in Appendix D1 now shows project by LRTP analysis year: 2015, 2025 or 2035. No 2017 network was created since the 2017 analysis used interpolation between 2015 and 2025. Eddie Dancausse of FHWA sent a follow-up email on May 8, 2009 concurring that since interpolation was used, no 2017 project list needs to be developed.

FHWA5:

Appendix I: Emission Analysis Results by County: in addition to the information provided please include the excel worksheets that show the calculations for the regional emissions analysis.

Response:

The excel worksheets that were used to calculate the emissions will be posted to the 2035 Conformity Report website at www.triangleair.org and are also available from John Hodges-Copple at Triangle J Council of Governments at johnhc@tjcog.org.

FHWA6:

Appendix K: Public and Agency Comments and Responses: This is a reminder that this needs to be included in the Final Draft Conformity Determination Report. Make sure to also include the information in the bullet below (that is currently available):

- Regionally significant and exempt project list agency review, agency comments, and NCDOT/MPO reply to comments.

Response:

This appendix K has been added, and includes the correspondence related to the review of regionally significant and exempt projects.

FHWA7:

Appendix L: VMT and Speeds: This information is missing. Please include this appendix and the relevant information.

Response:

Appendix L on VMT and Speeds has been added to the report.

FHWA8:

Appendix M: Adoption and Endorsement Resolutions and Agency Determinations: This is a reminder that this needs to be included in the Final Draft Conformity Determination Report. The following resolutions will be needed:

- CAMPO 2035 LRTP adoption
- CAMPO conformity determination on the 2035 LRTP and the 09-15 TIP
- DCHC MPO 2035 LRTP adoption
- DCHC MPO conformity determination on the 2035 LRTP and the 09-15 TIP
- BG MPO 2035 LRTP adoption
- BG MPO conformity determination on the 2035 LRTP and the 09-15 TIP
- NCDOT Secretary conformity determination on the donut area projects from the 09-15 STIP for the Counties of Chatham, Franklin, Granville, Johnston, Orange and Person

Response:

Upon action by the MPOs and NCDOT, the resolutions will be added to the document.

Environmental Protection Agency, Region IV (EPA)

We have reviewed the draft Triangle Conformity determination report, the 2035 LRTP, and the FY 09-15 TIP and our comments are below:

EPA1:

On page 1 in the "Decision Process" paragraph please spell out what FHWA and FTA mean for consistency.

Response:

Federal Highway Administration and Federal Transit Administration have been spelled out in the final conformity report.

EPA2:

In the list of the 2035 LRTP highway projects please include the project length for all projects.

Response:

Project length has been added to the list of highway projects in Appendix D1.

EPA3:

To facilitate comparison of the LRTP and the TIP please include the same project ID as the TIP list in the 2035 LRTP highway projects table.

Response:

For those projects in Appendix D1 with a TIP number, the TIP number has been added.

EPA4:

Please provide a copy of some of the MOBILE6.2 inputs and outputs for our review.

Response:

MOBILE6.2 input and output files will be provided as part of the final documentation.

Amanetta Wood, Environmental Scientist

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NC Division of Air Quality (DAQ-HJH)

I have finished my review of the Triangle Area Conformity Determination Report. I have no significant comments.

DAQ-HJH1:

I do agree with Eddie that copies of the emission calculation worksheets need to be included in the appendix. In addition, while John did give me the Excel files to review when I requested, please note that in the future, I need to be copied on all emission calculation worksheets. I spend the bulk of my time reviewing these calculations. This go round I do not recall getting copied on e-mails with VMT and speeds. Thank you for the opportunity to review this report.

Response:

The final report website will include copies of all emission calculation worksheets.

Heather J. Hildebrandt, Environmental Engineer

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NC DENR, Division of Air Quality TSS/ Mobile Source Compliance Branch

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Raleigh, NC 27699-1641

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Correspondence on review of regionally significant and exempt projects

The following is the correspondence between the MPOs, NCDOT and state and federal review agencies that was used to develop, review and finalize the designations of regionally significant and exempt projects in the list of projects released in the draft conformity report:

**FHWA Communication Seeking Review and Comment for the
2035 LRTP project list**

The attached files contain the information for the Triangle Area project list review

The review will consist of the following:

1. Reviewing the project list and validating the MPOs classification of the regionally significant and exempt projects
2. Comparing the project lists to the 09-15 TIPs to make sure that the 09-15 TIPs are direct subsets of the 2035 LRTPs

**FHWA Comments on the Triangle Area Project List for:
Regionally Significant and Exempt Projects**

2035 LRTP versus 09-15 TIP comparison to ensure that the 09-15 TIP is a direct subset of the LRTP

Regionally Significant and Exempt Projects:

Triangle Area 2035 LRTP Master Project list

- For the following project ID's why are they not regionally significant?
 - 34, 72, 110, A104, A157b, A197b, A1a, A205, A214, A223c, A380, A482, A49b and A53

CAMPO Response:

All of these principal arterials [those labeled with an "A" before the number that are within CAMPO jurisdiction] have been changed to regionally significant.

DCHC MPO Response

#34 (Holloway St; US 70 to east of Junction Rd.) – This project is regionally significant, and the LRTP will be changed to reflect this adjustment.

#72 (NC 54; Davis Dr. to Miami Blvd.) – This project is regionally significant, and the LRTP will be changed to reflect this adjustment.

#110 (US 15-501; Mt. Moriah to Garrett Rd.) – This project is regionally significant, and the LRTP will be changed to reflect this adjustment.

- For the following project ID's why are they labeled regionally significant?
 - A114, A234, A302a, A302b, A302c, A304, A305, A412, A431, A444, A448, A457, A56a and A56c

CAMPO Response:

These projects are no longer labeled regionally significant with the exception of A412. The FFC was coded correctly, but the text was wrong. It now shows as an Urban Principal Connector.

- For project ID 16.1: the exemption should be 93.127 and not 93.126.

DCHC MPO Response

#16.1 (Orange Grove Rd. intersection improvement) – This project is exempt under 93.127, and intersection reconfiguration listed in table 3; the LRTP will be changed to reflect this adjustment.

- For the following project IDs what type of projects are these since they are labeled as exempt?
 - 16.1, 33, 98, A14 and A302e

CAMPO Response:

A14 is a minor project to make a poor 2-lane road into a better 2-lane road with various safety improvements. I have left it as AQ Exempt.

A302e connects a few minor roads to make one continuous section. I have removed its AQ Exempt status.

DCHC MPO Response

#16.1 (Orange Grove Rd. intersection improvement) – This project is an intersection reconfiguration to improve sight distance and intersection angles, and is a safety improvement in that there are no capacity improvements.

#33 (Hillsborough Rd/Old Fayetteville) – Curb and gutter was added to this roadway several years ago as phase 1. This project is phase 2 in which bicycle and pedestrian facilities will be added to support the adjacent school campus.

#98 (South Columbia St.) – This project will improve vehicle safety and add bicycle and pedestrian facilities. No vehicle travel lanes are to be added. This is TIP project #0624 and is addressed in a subsequent section of this document.

DCHC and CAMPO Bike Ped List Exemption Designations: No comments or corrections

LRTP Comparison to the 09-15 TIPs:

Triangle Area 2035 LRTP Comparison to the CAMPO 09-15 TIP

- I-4709: this project is not in LRTP, please explain
- R-2000: the mileage in the LRTP is .69 miles and in the TIP is 29 miles, please explain.
- R-2814: this project is not in the LRTP. It is in the TIP as rural project was this modeled in the NCDOT rural spreadsheet? It is going to need to be included in the modeling in one place or the other.
- R-2635: this project is not in the LRTP, please explain
- U-5024: this project is not in the LRTP, please explain
- U-4763 A&B: this project is not in the LRTP, please explain

CAMPO Response:

I-4709

This is just a resurfacing project, and the TIP says it's already under construction.

R-2000

Explained by DCHC:

(Northern Wake Freeway or NC 540) – This project is complete and operating. The final phase is the addition of a travel lane to a ramp (westbound NC 540 exit to I-40 westbound entrance) that is 0.69 mile in length.

R-2814

This project is included in the LRTP. It is broken into segments. Those segments are:

A89a
A90a
A90b
A90c
A90d

Taken together, these projects widen 401 from Ligon Mill Rd to Louisburg with a Rolesville bypass.

R-2635

This project is included in the LRTP. The segments are:

F4b
F4c

U-5024

This project is included in the LRTP. A428

U-4763 A&B

B is listed as a study only in the TIP.

A is included in the LRTP. F12

Triangle Area 2035 LRTP Comparison to the DCHC 09-15 TIP

- R-2000: the mileage in the LRTP is .69 miles and in the TIP is 29 miles, please explain
- U-0624: is this an exempt project?
- R-3309: the mileage in the LRTP is 1.0 miles and in the TIP is 1.7 miles, please explain
- R-2635: this project is not in the LRTP, please explain
- U-4763B: this project is not in the LRTP, please explain

DCHC MPO Response

R-2000 (Northern Wake Freeway or NC 540) – This project is complete and operating. The final phase is the addition of a travel lane to a ramp (westbound NC 540 exit to I-40 westbound entrance) that is 0.69 mile in length.

U-0624 (South Columbia St.) – This project will improve vehicle safety and add bicycle and pedestrian facilities. No vehicle travel lanes are to be added. This is project #98 in the 2035 LRTP and the exemption issue is addressed in a previous section of this document.

R-3309 (T.W. Alexander) – This is a two phase project. Phase B (0.7 mile in length), from east of NC 147 to Miami Blvd. has been completed for several years and is not included in the 2035 LRTP. Phase A (1.0 mile in length), from east of NC 147 to Cornwallis Dr., is incomplete and included in the 2035 LRTP. The TIP description still includes the full length of this two phase project, 1.7 miles, but note that the TIP provides notes to distinguish the two phases.

R-2635 (Western Wake Freeway) – This project is in Wake County and therefore not part of the DCHC MPO planning area. The N.C. Turnpike Authority is in charge of the project and now calls the combination of this project and the extension of NC 147 (R-4763B) the “Triangle Expressway.”

U-4763B (Triangle Expressway) – This is project #66 (NC 147 or Triangle Parkway) in the 2035 LRTP. The N.C. Turnpike Authority is in charge of the project and now calls the combination of this project and the Western Wake Freeway (R-2635) the “Triangle Expressway.” Please note that the total project length for U-4763B is 3.5 miles in the TIP; this is 2.4 miles in Durham County and 1.1 miles in Wake County. Thus, the 2035 LRTP for the DCHC MPO lists project #66 as 2.4 miles.

Division of Air Quality Comments on the Triangle Area Project list for the 2035 LRTP

I have just a few general comments/questions:

I compared my comments to FHWA’s and removed duplicate comments.

I did not have any comments on Bike/Ped Lists.

I would prefer project lists to be sorted by year.

Does “Urban Minor” refer to Minor Arterials?

CAMPO and DCHC Response: Yes

Triangle Area 2035 LRTP Master Project List

- Why project ID 85 is currently classified as an urban minor road (and thus not regionally significant) when it is on the same road (North Durham Parkway) as ID 83 and ID 84? I realize that it is not as wide, but does it not serve the same regional purpose as the other two segments?
- What road serves the regional purpose in the place of ID A131? This project appears to be a long widening on a Minor Arterial and connects to US 64.
- ID A1a and ID A1b seem to be similar projects. If ID A1a is on a rural interstate, I would consider both to be regionally significant.

DCHC Response:

Projects #83, #84 and #85 comprise the Northern Durham Parkway, which will be located from US 70 near the Wake/Durham county line to US 501 (Roxboro Rd.). Project #85 will be the northern most segment of the Northern Durham Parkway and will be on the same alignment as Snow Hill Rd, which is currently Urban Minor Arterial. This segment will likely continue to provide access to mostly local and some regional trips. Project #84, new four-lane alignment from Old Oxford Highway to I-85, connects to Old Oxford Highway (Urban Minor Arterial and Rural Major Collector) and Hebron Rd (Urban Collector) and because of these connections will likely have a proportion of regional trips that classify the roadway as Urban Major Arterial.

CAMPO Response:

Changed A131 to be regionally significant.

A1a was incorrectly labeled as a rural interstate. It is actually a rural minor arterial. I’ve made the correction.

Triangle Area 2035 LRTP compared to the CAMPO 09-15 TIP

- I could not find the following projects in the Plan. Are they open?
 - R-2641, R-2906, R-2635, U-3101
- Was U-3344 modeled?
- U-5024 is in the 2009 completion year but the TIP shows construction in 2012.
- U-4447 is post year in the TIP but it is shown in the 2015 completion year for the 2035 plan. (Project was accelerated from 2020 in the 2030 plan.)
- Will R-3600 be open by 2015? It is unfounded in the TIP.

CAMPO Response:

R-2641 – I don't see this in the TIP.

R-2906 – Open to traffic

R-2635 – We have this in the LRTP (1st phase of I-540 toll road) ID's F4b and F4c

U-3101 – I don't see this in the TIP.

U-3344 – Yes it was modeled.

U-5024 – I checked again with Holly Springs. The first two lanes are open to traffic now, and the next two will be open by January 2010. For AQ purposes at least, this won't affect us.

U-4447 – That's right. This project will be paid for by the City of Raleigh. My understanding is that we can show something by 2015 if we anticipate that the TIP will be changed. Is that correct?

R-3600 – Yes. It will be funded by the Town of Wake Forest.

Triangle Area 2035 LRTP compared to the DCHC 09-15 TIP

- R-2906 is not in the Plan. Is it open?
- Will U-3804 be open by 2011?

DCHC Response:

R-2906 (NC 55 widening in Wake and Durham counties) has been completed and is operational.

U-3804 (Hillandale Road widening from I-85 to Carver St.) has construction funding in the 2009-2015 TIP for FY2010 and FY20. Progress for completing this project was slowed because of community concerns about the design and funding shortfalls at NCDOT. Nonetheless, the MPO believes the project will be open by 2011. The design issues have been resolved with the community and federal stimulus funds will move many NCDOT projects forward.

US Environmental Protection Agency Comments on the Triangle Area Project list for the 2035 LRTP

Thank you for providing the draft Triangle area conformity project list for our review. I have reviewed the documents and my comments are below. If you have any questions please feel free to contact me.

Amanetta Wood, Environmental Scientist

U.S. Environmental Protection Agency, Region 4, Air, Pesticides and Toxics Management Division
61 Forsyth Street, S.W.

Atlanta, Georgia 30303

Email: wood.amanetta@epa.gov

Phone: (404) 562-9025

Could you please identify the project type for the following projects since they are labeled as exempt?
16.1, 33, 98, A14 and A302e

DCHC MPO Response

#16.1 (Orange Grove Rd. intersection improvement) – This project is an intersection reconfiguration to improve sight distance and intersection angles, and is a safety improvement in that there are no capacity improvements.

#33 (Hillsborough Rd/Old Fayetteville) – Curb and gutter was added to this roadway several years ago as phase 1. This project is phase 2 in which bicycle and pedestrian facilities will be added to support the adjacent school campus.

#98 (South Columbia St.) – This project will improve vehicle safety and add bicycle and pedestrian facilities. No vehicle travel lanes are to be added. This is TIP project #0624 and is addressed in a subsequent section of this document.

CAMPO Response:

A14 is a minor project to make a poor 2-lane road into a better 2-lane road with various safety improvements. I have left it as AQ Exempt.

A302e connects a few minor roads to make one continuous section. Since it does add capacity, I have removed its AQ Exempt status.

2035 LRTP Comparison to the CAMPO 09-15 TIP

I-4709: please explain why this project is not in LRTP.

R-2000: please explain why the mileage in the LRTP is .69 miles and in the TIP is 29 miles.

U-4901: Please explain why the project description in the LRTP is new construction while the project description in the TIP is Widen to multilanes.

R-2814: please explain why this project is not in the LRTP.

R-2635: please explain why this project is not in the LRTP.

U-4763 A&B: please explain why this project is not in the LRTP.

CAMPO Response:

I-4709

This is just a resurfacing project, and the TIP says it's already under construction.

R-2000

Explained by DCHC:

(Northern Wake Freeway or NC 540) – This project is complete and operating. The final phase is the addition of a travel lane to a ramp (westbound NC 540 exit to I-40 westbound entrance) that is 0.69 mile in length.

U-4901

This is included in the LRTP – segment A13b

R-2814

This project is included in the LRTP. It is broken into segments. Those segments are:

A89a

A90a

A90b

A90c
A90d

Taken together, these projects widen 401 from Ligon Mill Rd to Louisburg with a Rolesville bypass.

R-2635

This project is included in the LRTP. The segments are:

F4b

F4c

U-4763 A&B

B is listed as a study only in the TIP.

A is included in the LRTP. F12

2035 LRTP Comparison to the DCHC 09-15 TIP

R-2000: please explain why the mileage in the LRTP is .69 miles and in the TIP is 29 miles.

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R-2635: please explain why this project is not in the LRTP.

U-4763B: please explain why this project is not in the LRTP

DCHC MPO Response

R-2000 (Northern Wake Freeway or NC 540) – This project is complete and operating. The final phase is the addition of a travel lane to a ramp (westbound NC 540 exit to I-40 westbound entrance) that is 0.69 mile in length.

R-3309 (T.W. Alexander) – This is a two phase project. Phase B (0.7 mile in length), from east of NC 147 to Miami Blvd. has been completed for several years and is not included in the 2035 LRTP. Phase A (1.0 mile in length), from east of NC 147 to Cornwallis Dr., is incomplete and included in the 2035 LRTP. The TIP description still includes the full length of this two phase project, 1.7 miles, but note that the TIP provides notes to distinguish the two phases.

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U-4763B (Triangle Expressway) – This is project #66 (NC 147 or Triangle Parkway) in the 2035 LRTP. The N.C. Turnpike Authority is in charge of the project and now calls the combination of this project and the Western Wake Freeway (R-2635) the “Triangle Expressway.” Please note that the total project length for U-4763B is 3.5 miles in the TIP; this is 2.4 miles in Durham County and 1.1 miles in Wake County. Thus, the 2035 LRTP for the DCHC MPO lists project #66 as 2.4 miles. U-4763B appears to be the planning study.