

November 11, 2016

John F. Sullivan, III, PE
Federal Highway Administration
310 New Bern Avenue, Suite #410
Raleigh, NC 27601

Robert P. Hanson, PE
NCDOT, Project Development Section Head
1548 Mail Service Center
Raleigh, NC 27699-1548

Subject: U-4714 East John Street-Old Monroe Road Improvements Environmental Assessment (EA)

The Town of Matthews appreciates all the NCDOT has done to educate the Town and its leadership on the U-4714 E John St-Old Monroe Road Improvements Project. Following NCDOT's recommendation, the Town of Matthews has procured a consulting firm to study of the project within the Town and a special emphasis on Segment A. The purpose of the study will be to provide recommendations for NCDOT to consider for the following:

- aesthetic treatments to maintain the downtown character in Matthews,
- recommendations to soften the look of the project's infrastructure,
- crossing opportunities and other bicycle and pedestrian mobility and connectivity amenities, and
- devices and enhancements for traffic calming and speed control through the corridor.

The NCDOT and the Town hope that the result of this study will resolve many of the Town's concerns with respect to the impact of the project to our downtown. We appreciate the ability to provide specific input on this project. There are other comments we have in reviewing the Environmental Assessment. We respectfully submit the following comments on the U-4714 EA for your consideration:

1. Throughout the EA, reference to suburban and rural context is prevalent. However, approximately half a mile of the project is within the Matthews Downtown area, and another half mile or so is a transition from the suburban nature of the street into the downtown. While one mile may seem a small part of the overall project, it is an extremely important part for the Town of Matthews. An example is on Page S-2: the description of the nature of the intersections along the corridor omits the intersection with S. Trade St., which is the hub of Matthews Downtown.
 - a. The EA needs to consider the Downtown portion of this project as separate and different from the rest of the project.
2. The Purpose and Need statements in the EA clearly state, "enhance mobility for pedestrians and bicyclists along the corridor." It appears that the only means of addressing this is to provide sidewalk and multi-use path. However, the Town believes that "mobility" means being able to reach one's destination. A linear path parallel to the roadway does not adequately address this unless the origin and destination are on the same side of the street.

- a. The EA needs to clearly state that crossing opportunities for bicycles and pedestrians will be included, especially in the Downtown section of the project where more bicyclists and pedestrians will desire to cross E John St.
3. The current practice in transportation design is to match the design speed to the desired operating speed. This is supported by NACTO and other organizations. The design speed for this project is 50 mph. However, in Segment A, the Town of Matthews desires a 25 mph speed limit in the downtown section (N Ames St to Charles Buckley Way) and 35 mph from Charles Buckley Way to I-485. It is imperative that the design speed match these desired operating speeds so that the project can effectively implement speed control features such as narrowed lane widths and street trees.
 - a. The Preliminary Plan needs to show design speeds of 25 mph from N Ames St to Charles Buckley Way and 35 mph from Charles Buckley Way to I-485.
4. The Table S-1 Summary of Impacts from the Preferred Alternative provides a good summary of the document. The following comments are in response to Table S-1 along with reviewing the correlating section of the EA.
 - a. Land Uses and Land Use Plans: “Project...would not substantially contribute to changes in land use.” The Town feels that existing street-fronting residential uses will change substantially; many homes will be a total take and therefore that land use would go from residential to vacant and homes remaining that front E John St will likely seek to be rezoned and redeveloped for higher-density housing or complementary uses as is typical when traffic volumes increase. The quoted statement above from the EA does not take this into consideration. There is no proposed mitigation to these impacts.
 - b. Land Uses and Land Use Plans: “The project is generally consistent with local land use plans.” The Town feels that the land use plans calling for protecting and enhancing the historic downtown and development of significant new neighborhoods along E John St on both sides of I-485 are not supported by this project. The high traffic volumes and likely high speeds resulting from a wide, open roadway will be a detriment to the land use plans with no proposed mitigation.
 - c. Community Resources: “Minor property impacts to adjacent resources and changes in access to/from the roadway.” Almost half the community resources identified in Section 4.1.3 are located in Matthews with no proposed mitigation identified -- churches, a post office, parks and greenways, and the historic downtown. Mitigation to these impacts could be assistance in improving the connectivity of the streets around the project.
 - d. Neighborhoods/Community Cohesion: “No permanent negative impacts to community cohesion/stability.” The proposed project bisects a neighborhood, eliminating a row of houses on one side. E John St, from Kent Dr to past Clearbrook, is a tree-canopied roadway with modest single-family homes that fronting the street facing each other. This cozy neighborhood feel will be destroyed when one row of homes is demolished and the trees are cut down. No proposed mitigation is identified.
 - e. Neighborhoods/Community Cohesion: “Sidewalk and/or multi-use path would improve mobility and connectivity for pedestrians and bicyclists...providing more options for interaction.” Facilities that are linear in nature for bicyclists and pedestrians with no crossing opportunities provide only linear mobility and no connectivity. Connectivity includes multiple connections to the facility, i.e. crossing opportunities. The proposed

- improvements isolate the multiuse path on one side with no intersecting streets and no crossing opportunities. Bike/peds are forced to jaywalk/bike to cross to the other side for connectivity and the resulting interaction. Proposed mitigation is to work with the Town on providing these crossing opportunities, such as Pedestrian Hybrid Beacons and signaling the u-turn movements, but these are not listed in the summary table.
- f. Visual/Aesthetic: “Opportunity for landscaped median...along the corridor would provide a benefit.” However, wide open roadway and substantial concrete medians at existing intersections create a hard look to the Town entryway and any intersecting streets. There are no options listed for proposed mitigation.
 - g. Noise: “96 traffic noise impacts due to future predicted noise levels that would approach or exceed FHWA noise abatement criteria.” Noise barriers and all other forms of noise control are ruled out for this facility. It is surprising that there is nothing that can be done to mitigate increased noise resulting from the project. This is very important to our community; a large portion of this project in the Town is along street-fronting single-family residential homes.
5. There is a concurrent project parallel to this project, the US-74 widening project U-2509. It is not clear to us whether or not that project was taken into account in the traffic analysis for this project. While the traffic engineers state that the modeling uses the 2035 Metrolina Regional Model, the U-2509 project was only recently funded. Therefore, it may not be in the version of the MRM used. Similarly, the Weddington Road Interchange project R-211EC combined with the I-485 Express Lanes project I-5507 may not have been included with the modeling due to the timing of the funding. In reviewing traffic numbers from the Weddington Road project, up to 35% of the traffic using the E John St interchange would be diverted to the Weddington Road interchange. These two very important projects (U-2509 and R-211EC) need to be included in the traffic modeling. We feel the very high volumes predicted for Segment A could be lower due to traffic diverting to these facilities.
 6. The alternatives analysis includes four options: No-Build, Transportation Management, Improve Existing Roadway, and New Location. Each of these were considered independently and only the entire corridor was considered as one unit. It seems that a combination of alternatives could achieve a desired result. Similarly, alternatives within the preferred alternative (Improve Existing Roadway) could also be combined. The Town would like the NCDOT to consider specifically the following:
 - a. Using Transportation Management such as Intelligent Transportation Systems to slow down speeds through the corridor. There are other management solutions that could be applied regionally such as expanding the NCDOT Traffic Management Center capabilities to the E John St corridor for incident management.
 - b. Using full-movement intersections to provide many crossing opportunities for bicyclists and pedestrians. Level of service analyses in Segment A do not show significant detriment to using full-movement intersection in this section. For example, looking at Greylock Ridge Build Alternative 3 (super street) and Build Alternative 1 (four-lane divided) indicates the superstreet intersection operates at LOS F and the full-movement signalized intersection operates at LOS B.

7. Some of the medians and u-turn bulbs shown on the Preliminary Plan seem to be oversized for the project. Specifically:
 - a. The median at N Ames St overlaps the intersection only slightly. It appears this median can be shortened to allow for full-movement of this intersection with E John St.
 - b. The proposed u-turn bulb located between the Post Office and Charles Buckley Way can be reduced in size or removed. The business located along Charles Buckley Way has agreed to reconfigure operations to utilize access onto E Charles St instead of E John St.
 - c. NCDOT has agreed to review the intersections for possible full-movement signals at Greylock Ridge Rd and McKee Rd at such time as those roads are extended across E John St.

Again, we appreciate the opportunity to review and comment on the Environmental Assessment for the U-4714 project. If you have any questions or need clarification on any of these comments, please contact me at 704-708-1243 or shwoolard@matthewsnc.gov.

Sincerely,



Susan Habina-Woolard, PE
Town Engineer

C: Elmo Vance, via email
Scott Cole, via email
Kim Bereis, via email