

February 1, 2018

Rodger Rochelle, Chief Engineer
North Carolina Turnpike Authority
1548 Mail Service Center
Raleigh, NC 27699-1548

Re: Comments on the Complete 540 Final Environmental Impact Statement (FEIS)

Dear NC Turnpike Authority, NCDOT, Federal Highway Administration, and partner resource agencies,

On behalf of the Regional Transportation Alliance—the voice of the business community on transportation in the Triangle region—we applaud your efforts to develop a thoughtful, comprehensive, multi-year review of the impacts of a proposed freeway that will be more than 25 miles in length, in one of the fastest growing regions in the United States. We thank NCDOT, its consultants, partners, and various resource agencies for the countless hours spent analyzing the impact to the human and natural environment, as well as the various transportation benefits and costs.

The balance of this letter speaks to our ongoing support for the project and the completion of the FEIS and highlights some key elements of our rationale.

We concur with the selection of the preferred alternative. This alternative strikes a balance that accomplishes the goals of the project while minimizing the various potential impacts to the greatest practical extent. It is consistent with land use plans that have been in place for decades and continues to be broadly supported by the community.

We believe that the purpose and need of the project is sound and rational, particularly given the clear rate of growth in the market, and achievable by the proposed project. The Final EIS demonstrates that the preferred alternative can accomplish the primary objectives to improve mobility within and through the study area during peak periods, and to reduce congestion on the study area's existing roadway network.

The creation of the new freeway will create an effective conduit for local and regional use that will reduce the need to widen or modify the existing roadway network. A new freeway by definition has zero signals, limited access, strong design standards to enhance safety, higher speed to improve regional accessibility, and minimum travel delays to enhance travel operations. Operating the road as a turnpike provides multiple additional benefits, including a dedicated funding source, the potential for guaranteed travel time even during potential future heavy travel periods through the ability to modify the toll if need be (e.g., by creating off-peak discounts to harmonize demand), and the means for public transit buses to use the facility to improve schedule adherence without having to construct a separate busway or bus lane.

Any contemplated alternatives to a new, signal free roadway cannot accomplish the travel time benefits for commuting, commerce, transit, and tourism. It is imperative to note that a freeway uniquely provides significant delay reduction, travel time certainty, regional accessibility, and safety benefits. While most roads do not need to be freeways, the alternative of widening existing roadways will result in an average travel speed of zero for portions of each journey, as traffic signals remain and, no matter how wide a non-freeway arterial roadway gets, the signals will have to be red at some point – in addition to having far lower posted speeds on those arterial roadways compared to 70 MPH on the Triangle Expressway. As well, travelers on this proposed freeway will relieve traffic on adjacent roadways, so even those who do not plan to use the turnpike, or expect to use it only occasionally, will benefit.

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In the absence of a completed 540, growth will continue to occur in the area but travel conditions and quality of life will deteriorate for both current and new residents. The selected alternative aligns with two decades of land use and transportation planning by both local municipalities and regional planners. A simple review of land and travel in suburban Northern Virginia or metropolitan Atlanta—where the removal of proposed freeways from their regional plans has certainly not eliminated the underlying pressure on land use development—demonstrates that in a growing market, “if you build it, they will come, but if you don’t, they will come anyway.” The Final EIS makes a similar determination noting that, “the amount of development and other land use changes actually induced by the project is expected to be very small compared to the overall development expected to occur in the (future land use study area).”

We concur that improved system linkage is also a desired outcome and one that will result in enhanced network resilience. We interpret “improved system linkage” to encompass both improved connectivity and the enhanced network resilience that results from that increased connectivity. Given that crashes will inevitably occur on the existing (or any) roadway network, and that delays due to such “nonrecurring congestion” can impact regional travel throughout a peak period, the connectivity and resiliency benefits of the proposed freeway are clear in that it will directly intersect with five freeways, including four Interstate routes: NC 540/Western Wake Freeway, Interstate 40, Interstate 42 (U.S. 70 bypass), Interstate 87 (U.S. 64/264/decommissioned I-495), and Interstate 540.

Regional transit will also benefit from the completion of the new freeway. Several GoTriangle buses already use portions of the existing 540 turnpike, either as part of their regular routes, or during peak periods to avoid delays on I-40 whenever rush hour congestion exists in the RTP area. Commuters, transit vehicles, and commercial traffic will have a similar ability to avoid congestion on the existing roadway network, thanks to the existence of this new freeway.

We thank you for the additional and follow-up research and studies that have occurred since the development of the draft EIS in 2015. In terms of environmental analysis and mitigation, we applaud NCDOT for their willingness to spend \$5 million to help preserve endangered and potentially protected species in the area, and to complement existing research efforts on those species, in cooperation with both university partners and resource agencies. We also thank NCDOT and the Turnpike Authority for reviewing the project in terms of updated traffic models, which demonstrate the continued validity of the traffic-related conclusions for our growing area.

We are hopeful that as result of the years of prior work through 2017 and the upcoming discussions associated with the Final EIS in 2018, that the Preferred Alternative can proceed in an expeditious fashion to the status of Selected Alternative and then as Build Alternative. The sooner that 540 begins construction, the sooner the benefits of a safer, resilient highway network can be realized for travelers and communities.

Thank you for the opportunity to comment, and for all the work you and your colleagues within NCDOT and your various partner and resource agencies do to enhance our natural and built environment.

Sincerely,



Joe Milazzo II, PE
Executive Director
Regional Transportation Alliance

Cc: Bruce Sargent, RTA chair
Maeve Gardner, RTA legislative and policy chair
Pete Marino, RTA freeways chair