FHWA-VT-EIS-77-02-FS

Burlington, Vermont

Southern Connector/Champlain Parkway Project

Project MEGC-M5000(1)

Record of Decision

A. Introduction/Background

The Southern Connector/Champlain Parkway project is a proposed transportation link located in the southwestern quadrant of the City of Burlington, Chittenden County, Vermont providing access between I-189, U.S. Route 7 (Shelburne Street) and the City Center District (CCD). Planning for this new highway construction project began in 1965. In 1979, a Final Environmental Impact Statement (FEIS) approved an alternative consisting of a highway on new alignment from I-189 to Battery Street. That alternative is referred to as the Null Alternative. At that time, the Federal Highway Administration's (FHWA) NEPA regulations did not require a Record of Decision (ROD). One section of the Null Alternative at the southerly limit of the project has been constructed, but never opened to traffic.

Subsequent to the issuance of the 1979 FEIS, concerns regarding hazardous wastes in the Pine Street Barge Canal area arose. This area was to be traversed by a portion of the 1979 Selected Alternative. The Pine Street Barge Canal was later classified as a Superfund Site by the United States Environmental Protection Agency (EPA). In 1997, FHWA issued a ROD identifying a Selected Interim Alternative to route traffic around the Superfund Site until the 1979 Selected Alternative could be completed.

In 2002, the City of Burlington formalized their efforts to modify the 1979 Selected Alternative and the 1997 Selected Interim Alternative as a result of public comments and the City of Burlington's preferences to blend the roadway design into the surrounding neighborhoods. Specifically, the roadway typical section would be reduced from a four-lane roadway to a two-lane roadway. The City of Burlington and the Vermont Agency of Transportation (VTrans) also agreed to formally abandon the C-8 Section through the Pine Street Barge Canal Superfund Site (PSBC), and designate the C-1 Section, C-2 Section and C-6 Section as the permanent alignment for the Southern Connector/Champlain Parkway.

The Southern Connector/Champlain Parkway project involves the construction of approximately 2.4 miles of new and reconstructed roadway along the C-1 Section, C-2 Section and C-6 Section. Within the 0.6 mile C-1 Section, the project includes lane reductions, shoulder reconfiguration and provides for one lane in each direction. The C-1 Section lane and shoulder reconfiguration involves a reduction in the cross-sectional width of the roadway, which includes replacing the majority of the existing concrete median barrier with a raised grassed median, removal of excess pavement, and the installation of lighting and landscaping amenities. A new shared-use path would also be constructed connecting Pine Street to Shelburne Street (U.S. Route 7) along the northern side of the C-1 Section.

The C-2 Section would commence on new alignment at the northern terminus of the C-1 Section, near Home Avenue, and extend northerly for a length of approximately 0.7 mile, as far as Lakeside Avenue.

The C-6 Section would route traffic around the PSBC utilizing the existing city-street network to provide access to the CCD. The C-6 Section would commence at the terminus of the C-2 Section at Lakeside Avenue, and proceed easterly along Lakeside Avenue to Pine Street. It would then follow Pine Street north to the CCD via Build Alternative 2.

B. Purpose and Need

The purpose of the Southern Connector/Champlain Parkway project is to improve access from the vicinity of the interchange of I-189 and U.S. Route 7 to the Burlington CCD and the downtown waterfront area; and to improve circulation, alleviate capacity overburdens, improve safety on local streets in the project study area and provide traffic relief in the southwestern quadrant of the City of Burlington.

The purpose of the project is also to eliminate the disruption to local neighborhoods and separate the local and through-traffic. Truck traffic that is destined for the CCD or the industrial areas accessed from Home Avenue and Flynn Avenue would be directed onto the Southern Connector/Champlain Parkway and removed from the local street network. The proposed transportation corridor is expected to become the major routing for north-south through-traffic in the area. The reassignment of the majority of through-traffic to this route would reduce traffic volume levels along neighborhood streets and improve accessibility to adjacent neighborhood areas.

One of the most distinct deficiencies has been the evolution of a city-wide street pattern with few north/south travel routes that are continuous. Pine Street provides a continuous and direct route from the southern end of the City to the CCD. Beginning at its southern terminus with Queen City Park Road and continuing north to Flynn Avenue, Pine Street is a two-lane residential street. North of Flynn Avenue, Pine Street continues to be a two-lane roadway, but the character of the area changes. With the exception of the Jackson Terrace Apartments and the Champlain

Elementary School, Pine Street is lined with commercial businesses and light industrial uses between Flynn Avenue and Kilburn Street. As Pine Street continues north to Main Street and the CCD, the area returns to a high-density residential neighborhood. Pine Street is highly desirable as an additional north-south route providing access between the CCD and points to the south. However, Pine Street has no direct connection to the two Principal Arterials, I-189 and U.S. Route 7. Pine Street is only accessible by traffic migrating to and from Shelburne Street over local, residential streets which include Home Avenue, Lyman Avenue, Ferguson Avenue, Flynn Avenue, Birchcliff Parkway, Locust Street and Howard Street. These local streets are not intended to, nor do they have the capacity to carry the volume of traffic which is diverted from arterial or collector systems.

In summary, the existing problems and deficiencies that have been identified are:

1. Congestion (including insufficient capacity to appropriately service traffic volumes and provide appropriate access);

2. Safety concerns created by vehicles utilizing roadways that functionally operate at a higher classification than intended, both along the minor arterials and in neighborhood areas which are acting as short-cuts; and

3. Mix of local and through-traffic in neighborhood areas (including truck traffic) created by a lack of a north/south arterial to access the CCD.

It should be noted that the alternatives considered in the 2009 Final Supplemental Environmental Impact Statement (FSEIS) are being presented as the full-build scenario, not as an interim phase.

C. Decision

This ROD documents the following project decisions made by FHWA:

- The C-8 Section of the 1979 FEIS Selected Alternative has been abandoned due to environmental concerns associated with the Pine Street Barge Canal Superfund Site.

- The Selected Alternative for this project is the further development of Build Alternative 2, consisting of the reconstruction of the previously built C-1 Section, construction of the C-2 Section as a new two-lane roadway on new alignment, and construction of the C-6 Section through the reconstruction of portions of Lakeside Avenue and Pine Street, all as described in Section 2.3.2.1.2 of the 2009 FSEIS.

D. Alternatives Considered

A wide range of alternatives have been considered for the Southern Connector/Champlain Parkway project since its inception. The logical termini for the project were determined to include the previously constructed C-1 Section to the south, and the CCD to the north.

Alternatives evaluated in the 1979 FEIS include:

1. No-Build Alternative;

2. The use of Alternate Travel Modes;

3. Pine Street Alternative - involving a widening of Pine Street to four-lanes, in addition to new location sections connecting I-189 and Battery Street; and

4. New Location Alternative, involving construction, primarily on new locations, connecting the I-189 interchange to Battery Street.

In the 1997 FSEIS the following interim alternatives were evaluated to temporarily avoid the PSBC in order to provide improvements pending resolution of the issues associated with the Superfund Site:

1. No-Build Alternative;

2. Transportation Systems Management, Transportation Demand Management and Public Transportation (Transit/TSM/TDM);

3. Build Alternatives; consisting of the previously constructed C-1 Section, a transition to a two-lane facility along the C-2 Section and five variations of the interim C-6 Section, connecting the I-189 interchange to Battery Street.

Since the decision to abandon the interim solution, there have been several additional permanent alternatives considered and evaluated in the 2009 FSEIS. These include the following:

1. No-Build Alternative

   The No-Build Alternative, as presented in the 2009 FSEIS, would consist of the existing street network in its present configuration. No further construction associated with the Southern Connector/Champlain Parkway would occur. The previously constructed C-1 Section would remain closed to traffic. The No-Build Alternative would not satisfy the purpose and need of the project.

2. Transportation Systems Management/Transportation Demand Management

As part of the development of this 2009 FSEIS, TSM options were considered as an alternative to the proposed project. The proposed project is focused on providing a system-wide improvement; therefore, TSM improvements alone would neither meet the future traffic demands anticipated within the study area, nor would they satisfy the purpose and need of the project.

TDM options were considered as alternatives to the proposed project action. There have been considerable efforts focused on TDM measures within the City of Burlington in the past. Analysis indicates that TDM measures alone are not sufficient enough to address the project purpose and need.

Public Transportation was also considered as an alternative to the proposed project action. Expanded pubic transportation is recommended to be pursued in the city, but is not, by itself, considered to be a reasonable solution to address the purpose and need of the project.

3. C-1 Section, C-2 Section and C-8 Section (four-lane) - Null Alternative

The 1979 FEIS presented a New Location Alternative as the Selected Alternative, since it provided the most satisfactory, safe, and expeditious movement of traffic, with the least adverse social, economic, cultural and natural resource impacts. This alternative consisted of the C-1 Section, the C-2 Section and the C-8 Section and was proposed to be a four-lane facility. This alternative is referred to as the Null Alternative in this 2009 FSEIS. The Null Alternative is not being evaluated for detailed study due to the substantial environmental impacts associated with this alternative. The City of Burlington and VTrans, with FHWA concurrence, cooperatively agreed to abandon the C-8 Section for the construction of the Southern Connector/Champlain Parkway project in March 2002 due to the impacts and complexities of environmental issues associated with the PSBC.

4. C-1 Section, C-2 Section and C-8 Section (two-lane)

A two-lane alternative following the same alignment as the Null Alternative, consisting of the C-1 Section, C-2 Section and C-8 Section, was considered during the development of the 2006 DSEIS. Although a two-lane roadway section would reduce the environmental, impacts associated with the PSBC when compared to the four-lane alternative, it would not eliminate them. As stated previously, the City of Burlington and VTrans, with FHWA concurrence, cooperatively agreed to abandon the C-8 Section for the construction of the Southern Connector/Champlain Parkway project due to impacts and complexities of environmental processing associated with the PSBC. Therefore,

this alternative was eliminated for further study due to its environmental impacts.

5. C-1 Section, C-2 Section and C-6 Section – Battery Street Extension (four-lane)

This alternative would be constructed on a roadway alignment similar to the 1997 Selected Interim Alternative and the Pine Street Alternative. The C-1 Section, C-2 Section and C-6 Section would be constructed as a four-lane roadway, with turn-lanes as needed. This alternative was initially considered for traffic comparison purposes to the Null Alternative. Substantial right-of-way, environmental and social impacts along Pine Street would be necessary in order to provide a four-lane section. This alternative would connect Pine Street to Battery Street by constructing a new four-lane roadway through the existing Burlington rail yard facilities. The railroad operations that would be impacted by the new roadway would be mitigated. As a result of the substantial environmental, socio-economic and right-of-way impacts and issues associated with a four-lane roadway and the relocation of the railroad operations, this alternative was not evaluated for detailed study.

6. C-1 Section, C-2 Section and C-6 Section – Battery Street Extension (two-lane)

This alternative would be constructed on a roadway alignment similar to the 1997 Selected Interim Alternative. The C-1 Section, C-2 Section and C-6 Section would be constructed as a two-lane roadway, with turn-lanes as needed. This alternative would connect Pine Street to Battery Street by constructing a new two-lane roadway through the existing Burlington rail yard facilities. This section of new roadway is referred to as the Battery Street Extension. The railroad operations that would be impacted by the new roadway would be mitigated. This alternative would have similar environmental and right-of-way impacts compared to the four-lane roadway described above in the vicinity of the Burlington rail yard; however, the impacts along Pine Street would be less compared to the four-lane section. This alternative was evaluated for detailed study and was referred to as Build Alternative 1 in the 2009 FSEIS. However, although Build Alternative 1 would satisfy the Purpose and Need for the project, this alternative has been determined to have an Adverse Effect under Section 106, uses Section 4(f) resources, displaces businesses and could potentially impact the EPA's remedy to the PSBC.

7. C-1 Section, C-2 Section and C-6 Section – Pine Street (four-lane)

This alternative would consist of the C-1 Section, C-2 Section and C-6 Section as a four-lane roadway, with turn-lanes as needed. The C-6 Section would utilize Pine Street from Lakeside Avenue to Main Street to provide access to the CCD. This alternative was initially considered for traffic comparison purposes

to the Null Alternative. The widening of Pine Street to accommodate a four-lane roadway would eliminate parking on Pine Street and substantially reduce the existing green space. As a result of the substantial environmental, socio-economic and right-of-way impacts this alternative was not evaluated for detailed study.

8. C-1 Section, C-2 Section and C-6 Section – Pine Street (two-lane)

This alternative would consist of the C-1 Section, C-2 Section and C-6 Section as a two-lane roadway, with turn-lanes as needed. The C-6 Section would utilize Pine Street from Lakeside Avenue to Main Street to provide access to the CCD. The environmental, socio-economic and right-of-way impacts along Pine Street would be substantially less compared to the four-lane roadway. This alternative was evaluated for detailed study and was referred to as Build Alternative 2, the Preferred Alternative, in the 2009 FSEIS. This alternative is the Selected Alternative.

9. C-1 Section and C-2 Section Only (two-lane)

This alternative would include construction of only the C-1 Section and the C-2 Section. The C-1 Section would involve reconstruction of the I-189/Shelburne Street (U.S. Route 7) Interchange, and construction of the Southern Connector/Champlain Parkway to approximately Home Avenue. This portion of the project has been constructed as a four-lane facility. Within the limits of the previously built section, lane and shoulder reconfiguration would provide one lane in each direction. Additional improvements would include replacing a majority of the existing concrete median barrier with a raised grass median, removal of excess pavement, lighting and landscaping to enhance the entrance to the City. A new shared-use path would also be constructed connecting Pine Street to Shelburne Street (U.S. Route 7) along the northern side of the C-1 Section. The C-2 Section would commence at the northern terminus of the C-1 Section, near Home Avenue, and extend northerly, as far as Lakeside Avenue. The C-2 Section would be a two-lane facility with dedicated turn lanes providing access to the existing local street network where permitted. At the terminus of the C-2 Section, traffic would be directed easterly onto the existing Lakeside Avenue to Pine Street. Traffic could then proceed north on the existing Pine Street to its intersection with Maple Street or divert to the local street system. Traffic could proceed westerly on Maple Street to Battery Street or continue northerly on Pine Street to Burlington's CCD. This alternative was not evaluated further because it would result in unacceptable levels of congestion during peak hours due to the increase in traffic volumes along the northern section of Pine Street, specifically in the area of Maple Street and King Street.

10. C-1 Section, C-2 Section and geometric improvements along Pine Street (two-lane)

This alternative would also include construction of the C-1 Section and the C-2 Section as described above, but would also provide geometric improvements along Pine Street. Pine Street would be reconstructed as a two-lane roadway with dedicated bicycle lanes and sidewalks, and turn-lanes at intersections where required. The addition of turn-lanes would require additional roadway width than currently exists. This would result in property impacts and acquisitions along Pine Street. A parking lane would be provided along Pine Street where feasible; however, on-street parking between Maple Street and Main Street would not be provided to limit impacts to adjacent residential buildings. As a result of substantial socio-economic issues associated with the loss of on-street parking along Pine Street in the vicinity of Maple Street, King Street and Main Street; this alternative is not being evaluated further at this time. Consideration was also given to expanding the geometric improvements to include widening Pine Street to provide on-street parking between Maple Street and Main Street as well as the additional pavement width for the required turn lanes. This scenario was eliminated from further consideration because it would create substantial right-of-way impacts, socio-economic impacts and historical/archaeological impacts.

11. C-1 Section, C-2 Section and C-6 Section with one-way street patterns.

This alternative would include construction of the C-1 Section, C-2 Section and the reconstruction of Pine Street from Lakeside Avenue to Pine Place. This alternative would require the construction of a new roadway from the southern terminus of South Champlain Street to Pine Street in the vicinity of Pine Place. This section of new roadway is referred to as the South Champlain Street Extension. Pine Street would become one-way northbound between Kilburn Street and Main Street. South Champlain Street would become one-way southbound between Main Street and Pine Street. Maple Street (eastbound) and King Street (west bound) would form a one-way pair between Battery Street and Pine Street. The need to provide only one travel lane within the existing curblines would allow for dedicated bicycle lanes and on-street parking lanes. The South Champlain Street Extension would impact Curtis Lumber's (formerly Gregory Supply) current business operations and facility located on Pine Street. The former Burlington Street Department property would also be impacted. This alternative is not being evaluated further due to the right-of-way, socio-economic, Section 4(f) and rail yard impacts.

All of the above alternatives were described in more detail in Section 2.2 Scoping of Alternatives in the 2009 FSEIS.

Summary of the Build Alternatives Selected for Further Study

Build Alternative 1 and Build Alternative 2 were carried forward for detailed study in the SEIS. Both Build Alternatives are described below. Build Alternative 2 is described first, because it is the Selected Alternative.

Build Alternative 2

Build Alternative 2 would consist of a two-lane roadway along the C-1 Section, C-2 Section and C-6 Section, with turn-lanes as needed. This alternative would connect I-189/U.S. Route 7 (Shelburne Street) to the Burlington CCD. The three sections of Build Alternative 2 are described below:

C-1 Section:

The C-1 Section would consist of reconstruction of the I-189/Shelburne Street (U.S. Route 7) interchange, and construction of the Southern Connector/Champlain Parkway to approximately Home Avenue. This portion of the project has been previously constructed as a four-lane facility. Within the limits of the previously built section, lane and shoulder reconfiguration would reduce the roadway cross-section to one lane in each direction. Additional improvements would include replacing a majority of the existing concrete median barrier with a raised grass median, removal of excess pavement, inclusion of lighting and landscaping to enhance the entrance to the City of Burlington. This section of the project would provide a transition between the interstate and the city street system. A new shared-use path would also be constructed connecting Pine Street to Shelburne Street (U.S. Route 7) along the northern side of the C-1 Section.

C-2 Section:

The C-2 Section would commence at the northern terminus of the C-1 Section, near Home Avenue, and extend northerly on new location for approximately 0.7 mile, as far as Lakeside Avenue. A four-lane concept for this portion of the project was previously approved and designed, and right of way that corresponded to that design has been acquired. The C-2 Section was never constructed. Similar to the C-1 Section, modifications have been proposed for the C-2 Section design subsequent to the 1979 FEIS. The C-2 Section would be a two-lane facility with dedicated turn lanes at the local street at-grade intersections where permitted. A new shared-use path would also be constructed along the eastern side of the C-2 Section.

C-6 Section:

Build Alternative 2 would reconstruct a portion of Lakeside Avenue, from the terminus of the C-2 Section to its intersection with Pine Street. Build Alternative 2 would proceed north along Pine Street from Lakeside Avenue to its intersection with Main Street. Build Alternative 2 would provide direct access to the Burlington CCD.

Pine Street (Lakeside Avenue to Pine Place):

Build Alternative 2 would consist of cold-planing and resurfacing the existing Pine Street pavement, limited drainage improvements, new granite curb, and construction/replacement of sidewalk to provide a continuous walkway for pedestrians. Build Alternative 2 would accommodate two 13-foot minimum travel lanes and an eight-foot parking lane on the eastern side (where feasible and permitted), curbing and sidewalks. The travel lanes would be designated as shared-lanes to accommodate both motor vehicles and bicyclists. Sidewalks are proposed on the western side of Pine Street from Lakeside Avenue north to Pine Place. A continuous sidewalk would also be provided along the eastern side of Pine Street from Lakeside Avenue to Pine Place.

Build Alternative 2 would not provide relocated utilities unless conflicts with proposed features occur; therefore, the existing overhead utilities located along Pine Street would remain in their current location.

Pine Place to the CCD:

Build Alternative 2 would continue north along existing Pine Street to the intersection with Main Street providing a connection to the Burlington CCD.

Under Build Alternative 2, Pine Street would be cold-planed and resurfaced, and work would include limited drainage improvements, new granite curb, and a continuous sidewalk on both sides of the roadway for pedestrians. The typical roadway section in this area would consist of two 13-foot minimum travel lanes and an eight-foot parking lane on the eastern side (where feasible and permitted), curbing and sidewalks. Bicyclists would utilize the shared-travel lane as previously described for the segment between Lakeside Avenue and Pine Place. Right-of-way acquisitions are anticipated to be limited to properties adjacent to Pine Street's intersections with Maple Street and King Street. These potential acquisitions would be associated with the installation of new traffic signals at these two intersections and any utility relocation required to accommodate these new traffic signals. Temporary easements are anticipated to complete the construction along Pine Street. Build Alternative 2 would not result in any impact to the State of Vermont's existing rail yard, the former Burlington Street Department property or Curtis Lumber (formerly Gregory Supply Company).

Build Alternative 1

Under Build Alternative 1, the C-1 Section and C-2 Section would be identical to Build Alternative 2. The C-6 Section would be similar to Build Alternative 2 until the alignment reached the vicinity of Pine Place. At this point Build Alternative 1 would proceed northwesterly on new location from Pine Street to the intersection of Battery Street and Maple Street. This connection is referred to as the Battery Street Extension. From the intersection of Battery Street and Maple Street, Build Alternative 1 would have proceeded north along existing Battery Street to its intersection with Main Street, providing a connection to the Burlington CCD.

This alternative departs from Pine Street, just north of the Pine Place intersection in the vicinity of the former Burlington Street Department property, and proceeds northwesterly, traversing the former City of Burlington Street Department property, Curtis Lumber's (formerly Gregory Supply Company) property and the State of Vermont rail yard. The typical roadway section in this area would consist of two 12-foot travel lanes with two-foot shoulders, curbing and a sidewalk along the eastern side of the roadway. Right-of-way acquisitions would be required for the construction of this alternative. Build Alternative 1 would require the demolition of approximately one-quarter of the former Burlington Street Department building. This alternative would also relocate the existing rail spur to the west of the proposed Battery Street Extension; therefore, no railroad grade crossings would be created along this portion of the proposed roadway. As part of Build Alternative 1, a rail yard mitigation plan would need to be included for impacts to portions of VTR's operations within the State of Vermont's existing rail yard. Reconfiguration of the rail yard is described in Section 4.2.2 of the 2009 FSEIS.

Improvements along Battery Street from Maple Street to Main Street would also be included. The typical section for Battery Street in this area would consist of two travel lanes with left-turn lanes at the intersections and parking lanes on both sides of the street. A shift of approximately seven feet in the eastern curbline between Maple Street and King Street would be required to accommodate the additional parking lane. This would reduce the green space for this entire area; however, no other substantial features would be affected as a result of this change. The western curbline would remain unchanged. A new traffic signal would be installed at the intersection of Maple Street and Battery Street.

E. Basis for the Decision

The No-Build Alternative would not satisfy the purpose and need of the project.

Build Alternative 1 has been determined to have an Adverse Effect under Section 106, would require the use of Section 4(f) resources, would displace businesses and may potentially impact the EPA's remedy to the PSBC.

The selection of Build Alternative 2 for further development is based on the following:

- Build Alternative 2 meets the Purpose and Need
- Build Alternative 2 minimizes Section 106 and Section 4(f) impacts
- Build Alternative 2 minimizes potential impacts to the PSBC and related properties
- Build Alternative 2 avoids impacts to the State of Vermont rail yard

- Build Alternative 2 minimizes the construction costs compared to Build Alternative 1.

Based on the above, FHWA has determined that Build Alternative 2 is the environmentally preferable alternative in accordance with 40 CFR 1505.2(b).

F. Section 4(f) Analysis

The Selected Alternative would not require the use of most Section 4(f) resources with the exception of the Battery Street Historic District. Pine Street, from approximately Maple Street to just south of Main Street is located within the Battery Street Historic District. Build Alternative 2 would primarily utilize the City's existing right-of-way; however, it is anticipated that the traffic signal installations proposed at the intersections of Pine Street at Maple Street and Pine Street at King Street would require the acquisition of a minor strip of land from the adjacent contributing structures located within the Battery Street Historic District.

It has been determined through the Section 106 process of the National Historic Preservation Act that the Selected Alternative will result in a determination of "no adverse effect" to historic resources. FHWA has coordinated with the VT SHPO regarding their intention to make a *de minimis* determination for Build Alternative 2. In addition, the 2006 DSEIS defined the uses of Section 4(f) property resulting from Build Alternative 2 and was circulated for public comment from November 1, 2006 through December 29, 2006.

Due to the minimal impacts to Section 4(f) resources, which would occur under the Selected Alternative, Section 4(f) requirements are satisfied by the *de minimis* provisions of SAFETEA-LU (dated August 10, 2005). For historic sites, a *de minimis* impact means that FHWA has determined (in accordance with 36 CFR Part 800) that either no historic property is affected by the project or that the project will have "no adverse effect" on the historic property. In accordance with 23 CFR 774, Build Alternative 2 satisfies the *de minimis* criteria; therefore, no avoidance alternative analysis is required.

As a result of FHWA's Section 4(f) *de minimis* determination for Build Alternative 2, the requirement to develop measures to minimize harm is satisfied by incorporation of the mitigation measures developed under the Section 106 process.

A detailed description of the Section 4(f) resources in the study area is provided in Section 5.4 of the 2009 FSEIS.

G. Executive Order 11990 – Protection of Wetlands

Based upon the analysis in the 2009 FSEIS, FHWA has determined that there is no practicable alternative to the proposed construction in wetlands and that the proposed action includes all practicable measures to minimize harm to wetlands which may result from such use.

H. Measures to Minimize Harm

All practicable measures to minimize harm have been implemented for the Selected Alternative. The following summarizes the mitigation measures and commitments that have been made by FHWA, VTrans and the City of Burlington for the Selected Alternative.

Traffic Operations

- The Selected Alternative does not result in negative impacts to traffic compared to the 2028 No-Build Alternative.
- The Selected Alternative would provide exclusive pedestrian phases at signalized intersections and crosswalks to maintain the accessibility across the Southern Connector/Champlain Parkway.

Rail Operations

- The Selected Alternative does not impact any railroad operations; therefore, no mitigation would be required.

Bus Service

- No mitigation would be provided for impacts to existing bus services.

Park and Ride Facilities

- No mitigation would be provided for impacts to existing park and ride facilities.
- No mitigation would be provided for the impacts to the existing PARC commuter parking lot for the loss of 70 parking stalls. Adequate parking exists within the remaining parking lot to continue to provide services at this location. Also, this lot is the site of the proposed South End neighborhood Transit Center, which would redevelop the site.

Bicycle/Pedestrian Facilities

- The Selected Alternative would include a shared-use path along the C-1 Section, from Shelburne Street to Pine Street. This path would provide mitigation for bicyclists and

pedestrians that would no longer be able to access Queen City Park Road from Pine Street.

Emergency Vehicle Access

- No mitigation would be provided for emergency vehicle access. Sufficient alternative routings exist for emergency vehicles to provide services within the study area.

Impacts to Neighborhoods

- The isolation of three houses, one on Home Avenue and two on Briggs Street, on the west of the C-2 Section is not considered to be an impact to the cohesiveness to the Flynn Avenue/Home Avenue neighborhood, because connectivity will be maintained at the Southern Connector/Champlain Parkway intersections with Home Avenue and Flynn Avenue.

Right-of-Way Impacts

- The acquisition and relocation program will be conducted in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended and relocation resources are available to all relocatees without discrimination.

- The Selected Alternative would have no substantial impacts to properties along the proposed alignment.

Environmental Justice

- Under the Selected Alternative, there would not be a disproportionately high and adverse effect on minority or low-income populations; therefore, no mitigation would be required.

Consistency with Local and Regional Plans

- The Selected Alternative would provide pedestrian amenities that would enhance the project corridor for pedestrians, including landscaping, shared-use paths, sidewalks, crosswalks, and traffic signals with exclusive pedestrian phases.

Wetland Impacts

- Appropriate limit-of-work barriers and erosion and sedimentation control measures would ensure protection of the wetlands surrounding the project and any indirect impacts.

- The realignment of the 1979 Selected Alternative from the C-8 Section to the C-6 Section has resulted in a reduction of wetland impacts.

- Wetland impacts for the project area have already been mitigated as part of the wetland creation performed in conjunction with the previously constructed Northern Connector. Coordination with ACOE and EPA will be continued during final design through the Section 404 permitting process.

Historic and Archaeological Resource Impacts

- Under the Selected Alternative, no additional archaeological testing is anticipated because it is apparent that the areas associated with the anticipated construction limits have been previously disturbed.

- The proposed traffic signals that are required at the Pine Street/Maple Street intersection and the Pine Street/King Street intersection would be historically compatible to blend into the surrounding Historic District. This would be accomplished by using pedestal mounted traffic signal poles. This equipment would also be painted to blend into the surrounding Historic District to the extent possible.

Air Quality Impacts

- Under the Selected Alternative, no impacts are anticipated; therefore, no mitigation is required.

Noise Impacts

- No mitigation is proposed for noise impacts for the Selected Alternative. Abatement measures have not been found to be feasible or reasonable.

Public, Conservation and Recreation Land Impacts

- Under the Selected Alternative, no impacts are anticipated; therefore, no mitigation is required.

- Pocket Parks would be included under the Selected Alternative at the intersection of the Southern Connector/Champlain Parkway and Flynn Avenue.

Hazardous Materials Impacts

- For properties with land-use restrictions associated with the PSBC, a HASP would be developed to address the potential of encountering coal tar during construction along the C-6 Section.

- The Selected Alternative is not anticipated to impact any hazardous materials; therefore, no mitigation is proposed.

- Any contaminated soil encountered would be handled in accordance with the EPA's and Vermont Department of Environmental Conservation's (DEC) regulations.

Visual Impacts

- Under the Selected Alternative, landscaping would be provided to mitigate visual impacts.

- The City has discussed constructing berms between the proposed shared-use path along the C-2 Section and the adjacent residences. These berms would be grassed with some additional landscaping to provide partial screening from the shared-use path.

Construction Impacts

- The National Ocean Service (NOS) will be given at least 90 days notice for the planned relocation of any geodetic control monuments which may be disturbed or destroyed by the Selected Alternative.

I. Monitoring or Enforcement Program

Construction and environmental commitments for the Southern Connector/Champlain Parkway project will be supervised and controlled by the City of Burlington and VTrans. It is expected that the Army Corps of Engineers (ACOE), the Vermont Agency of Natural Resources (ANR), and the EPA will make compliance reviews to ensure that the various permit conditions are met.

J. Responses to Comments on 2009 Final Supplemental Environmental Impact Statement

The 2009 FSEIS was circulated for comment on October 2, 2009. Comments from reviewing agencies and the public were received through November 2, 2009. Below are the comments that were received on the 2009 FSEIS and corresponding responses. All comments are shown separately in ***bold italics*** for the purpose of identifying and providing responses to each concern. For clarity, multiple comments are bracketed and labeled.

Responses were provided to all substantive comments. Non-substantive comments were noted; however, no response was provided. Examples of non-substantive comments are "I support this project" or "I do not support this project".

Comment 1:

From: Rob Donahue [donahue@together.net]
Sent: Monday, September 28, 2009 10:42 PM
To: Burl-SEIS
Subject: Southern Connector

{Why can't the Southern Connector be built on piers over the barge canal superfund site?}

Seems like such a logical corridor for this highway and not an incompatible use with the hazardous barge canal.

Certainly a superior routing relative to the Lakeside Drive / Pine Street lame alternative.

Robert J. Donahue

Shelburne VT

Response to Comment 1:

Alternatives through the PSBC have been dismissed due to environmental concerns and the potential liability to the City of Burlington, VTrans and FHWA for disturbing the EPA's remedy at the PSBC.

Comment 2:

From: Gabe Arnold [GArnold@veic.org]
Sent: Wednesday, October 14, 2009 10:08 PM
To: Burl-SEIS
Subject: Champlain Parkway Comments

To Whom it May Concern:

I am writing to express my support for the Champlain Parkway Project, Build Alternative #2. As an affected homeowner on Pine St., I experience every day the noise and pollution caused by truck and commuter traffic passing through our neighborhood. I am also a regular bicycle commuter on Pine Street. The current situation is environmentally unfriendly, unsafe for bicycles/pedestrians, and not sustainable. I believe Build Alternative 2 represents a reasonable compromise that will help solve the problems of truck and commuter traffic in our neighborhood, while improving safety for bicycles, pedestrians, and other forms of alternative transportation. Thank you for the opportunity to comment.

Sincerely,

Gabe Arnold, P.E.

974 Pine St.

Burlington, VT 05401

802-238-2244

Response to Comment 2:

Comment noted. No response required.

Comment 3:

From: Paul Engels [paulengels@comcast.net]
Sent: Tuesday, October 20, 2009 4:17 PM
To: Burl-SEIS
Subject: comments on Southern Connector/Champlain Parkway

Mr. Kenneth Sikora and Mr. Wayne Davis,

Thank you for the opportunity to comment on this long overdue project. I live in the Eastwoods neighborhood in South Burlington which is near the current terminus for 189. I have lived here for 21 years. During most of that time our neighborhood has battled the effects of having a lot of the traffic originally intended to move downtown on Southern Connector moving though our neighborhood. We obviously are not the only south end neighborhood to suffer from being in the path of all of the traffic that enters the city of Burlington from the south but we have had to deal with it as best we could.

For many years we were a cut through neighborhood for people trying to get from Swift Street to downtown without going through the lights and the traffic. We stopped that by making what was then the northern end of Farrell Street into a one way street coming out of our neighborhood headed south. That and the later building of O' Dell parkway through the condo and apartment projects to the corner of Home Avenue has helped a lot but still we are stuck with the traffic going into the city on Shelburne Road which our neighbor borders.

I am and always have been appalled by several things in regard to the Southern Connector. First almost any city in the country and probably now in the world built connecting highways from the their interstate highways through their downtowns many years ago. Cities have inner loops and outer loops which we have chosen to call the Southern Connector and the Circumferential Highway.

I know of the environmental issues of sprawl and traffic patterns. I am a liberal pro environment person but not having these highways makes no sense to me. Traffic could be moving seamlessly and easily downtown with exit ramps for several of the downtown streets. It could be connecting to the Northern Connector so it would be easy to travel from one end of the city to the other. Instead we have endless traffic lights through residential neighborhoods which have fought back with car damaging speed bumps. I do not see the environmental value of having thousands of cars idling and spewing CO2 at stop lights and backed up stop signs.

I do see the destruction of the quality of life of neighborhoods that have been forced to take all of this traffic on their residential streets. The entire Maple Street-Pine Street area has been destroyed by traffic. Shelburne Road, Pine Street and St. Paul Street that could have been residential streets are instead feeder streets for downtown traffic. North Champlain Street is a mine field of speed bumps.

The impact goes even further. I am sure we would not need a boulevard through the University of Vermont campus if entrance to the city would have come from exit 13 on the Southern Connector.

Instead thousands of students wait daily to cross the four lane access road that passes through their campus. Worse yet the bumper to bumper traffic idles at light after light for at least a mile almost any time of the day.

Does anyone see the bigger picture of not having the Southern Connector? Does anyone travel to Worchester or Springfield or Albany or Syracuse or Rochester or almost anywhere else on earth to see what a problem this is for the City of Burlington? The city is jammed up in all of its residential neighborhoods because of a failure to build a simple interstate highway loop 30 years ago.

{(a) I trust when you do build the Southern Connector that it will be a four lane limited access highway.} {(b) I hope too that it will connect to the Northern Connector. Is there any chance that the Northern Connector could then connect to exit 16 thus completing the loop?}

Paul Engels

15 Orchard Road

South Burlington, VT 05403

802-862-5428

Response to Comment 3:

(a) The Notice of Intent, published in the Federal Register on December 31, 2003, explained that the SEIS would evaluate the impacts of reducing the Southern Connector/Champlain Parkway to a two-lane facility. Based on the traffic analyses conducted for the SEIS, the City of Burlington, with the concurrence of FHWA and VTrans, has determined that a four-lane roadway is not required for the project area.

(b) Future connection to the Northern Connector is not precluded by the construction of the Southern Connector/Champlain Parkway.

Comment 4:

From: allan hunt [huntinc@together.net]
Sent: Thursday, October 29, 2009 11:47 AM
To: Burl-SEIS
Subject: Champlain Parkway FSEIS 2009

I am writing is response to the recently released 2009 FSEIS. My first comment relates to the difficulty of reading and understanding this document. At over a 1,000 pages and the constant cross references to the 2006 draft, making sense of this document seems nearly impossible to the lay reader!

I have owned two properties on Maple Street between Pine and South Champlain for over 25 years. I have lived in both properties on and off over that period and currently reside in one of them. Through the years, I have seen substantial improvement in the residential and commercial structures as a result of heavy public investment initially, followed by private interests who believe the proximity to the downtown and waterfront make the area a very desirable place to live and work. The major negative to the area is heavy truck and car traffic which buffets the neighborhood from 6AM - 8PM during the week with a little relief on the weekends. I have looked forward to the building of the connector from the day I bought the property, thinking it would provide relief from this nuisance and health hazard.

Imagine my surprise in reading the FSEIS to find that the option that would provide true relief to our neighborhood, Alternative #1, was rejected in favor of Alternative #2, which would dump all the traffic into the heart of our already overburdened neighborhood! It is impossible to understand what possible sense this decision makes in light of the original goals of the road, which were to facilitate traffic into the downtown AND reduce the impact on neighborhood streets. It appears that the authors of the report have totally forgotten the reason to build the road! ***{(a) My understanding is that Alternative #1 was rejected due to the possibility that some "historical resources" might be negatively impacted}*** while ***{(b) it was found to be ok to negatively impact the 2500 or so residents{mainly low/moderate income]}*** and the many historical properties in Alternative #2. ***{(c) In fact, the report projects a 30% increase in traffic along Pine Street from Maple to Main. How can this not have a negative impact on those living along Pine Street as well as the adjacent streets?}***

In summary, my opinion is that alternative #2 does nothing to achieve the goals set out for building the road and would have a huge negative impact on the livability and health of the neighborhoods residents, while Alternative #1 would in fact achieve the goals of the project.

Response to Comment 4:

(a) FHWA would be prohibited from implementing Build Alternative 1 because there is a feasible and prudent alternative (Build Alternative 2) to the use of Section 4(f) resources that would be required under Build Alternative 1.

(b) There would not be a disproportionately high and adverse human health or environmental effect on minority or low-income populations.

(c) Under Build Alternative 2, a 27 percent increase in traffic is anticipated along Pine Street between Maple Street and Main Street; however, the installation of traffic signals at the intersections of Pine Street with Maple Street and Pine Street with King Street will provide improved LOS in this area of Pine Street.

Comment 5:

From: Betsy Rosenbluth [brosenbluth@orton.org]
Sent: Sunday, November 01, 2009 11:46 AM
To: Burl-SEIS
Subject: Champlain Parkway EIS Comments

I have reviewed the draft EIS for the Southern Connector/ Champlain Parkway and I would like to comment. ***{The only buildable alternative to me, (Build Alternative 1) is to connect Pine St with Battery Street directly. To improve traffic south of Lakeside Ave, only to dump it onto Maple and King street, simply displaces a problem and exacerbates an already frustrating traffic situation and neighborhood traffic problem. The Please do not build this highway without a direct link, as proposed from Pine st at Pine Place, directly connecting to Battery Street.}*** Otherwise I believe we will be spending the next 20 years planning improvements to the King Street neighborhood, due to your short sightedness.

Thank You,

Betsy Rosenbluth

121 Charlotte Street

Burlington

Response to Comment 5:

Refer to the Response to Comment 4(a) and 4(c).

Comment 6:

From: Jeff Byam [jeffbyam@yahoo.com]
Sent: Sunday, November 01, 2009 4:12 PM
To: Burl-SEIS
Subject: We Oppose the Southern Connector

Dear Sir or Madam:

We are writing to voice our opposition to the construction of the Southern Connector in the City of Burlington. We feel this project will negatively impact the south end neighborhoods and quality of life for numerous residents of Burlington. It will also do little to improve the quality of transportation within the City of Burlington and beyond.

{(a) The resulting increase in traffic, noise, and pollution will all be detriments to residents of Burlington who live near the proposed Southern Connector.} Furthernore building additional roads often does little to improve traffic congestion in the long run in a city or other highly populated area. ***{(b) The best antidote for traffic is improved public transportation, marketing of potential public transportation options along with improved walk ways and bike ways. We would much rather see a train option to get out of the city of Burlington or how about an express bus heading south out of the city that could mirror the success of the express Essex bus route.}***

Thank you for taking our comment.

Sincerely,

Jeff and Anya Byam

40 Caroline St.

Burlington, VT 05401

Response to Comment 6:

(a) The noise analysis was performed as outlined in the VTrans noise policy entitled *Vermont Agency of Transportation Noise Analysis and Abatement Policy* approved by the FHWA in August 1997. Noise impacts occur at receptors where the levels approach or exceed the Noise Abatement Criteria (NAC). VTrans defines "approach" as 1 dBA below the NAC. VTrans' noise policy also defines a noise impact when project noise levels substantially exceed the existing ambient noise levels.

Section 4.9 of the 2009 FSEIS shows that noise impacts are anticipated at receptor locations along Pine Street for both Build Alternatives; however, due to spatial constraints, noise mitigation measures are not feasible or reasonable.

Air analysis completed for the project shows that both Build Alternatives are in compliance with the National Ambient Air Quality Standard (NAAQS) and Vermont's Air Pollution Control Division (APCD) guidelines. There are no impacts anticipated, nor mitigation required.

Refer to Section 4.8 for additional information regarding air quality.

(b) Public Transportation was considered as an alternative to the meeting the project's Purpose and Need (refer to Section 2.2.2 of the 2009 FSEIS). The possibility of increased public transportation has been evaluated in the City of Burlington for many years. The 2001 Chittenden County Regional Plan identified one of its goals was to improve the mass transit system by the expansion of the Chittenden County Transportation Authority service area and frequency of operation, introduction of passenger and commuter rail and construction of multi-modal centers, transit-oriented developments, and park-and-ride lots.

Recently, the operation of the commuter train from Charlotte to Burlington, the Champlain Flyer, was suspended indefinitely by the VTrans as a result of poor utilization. For a commuter train to succeed it must connect one substantial population base to another.

Expanded pubic transportation is recommended to be pursued in the city, but is not, by itself, considered to be a reasonable solution to address the purpose and need of the project. The Preferred Alternative does not preclude the implementation of public transportation projects.

Comment 7:

From: Lewack/MacDonald Family [macwacks@burlingtontelecom.net]
Sent: Monday, November 02, 2009 12:56 AM
To: Burl-SEIS
Subject: Comments on FSEIS for Champlain Parkway

I write to express strong objections to the project, as presented in the draft FSEIS. I am a homeowner in an abutting neighborhood, and use the affected streets on a daily basis to get myself to work and city services and my children to school. The building of this project as proposed would significantly degrade the transportation infrastructure and quality of life in my neighborhood and adjacent neighborhoods. In my opinion, it would also not accomplish its stated design objectives, and make existing traffic congestion problems worse.

I have spent several hours reviewing the FSEIS. The document reveals several troubling flaws of logic and analysis, including:

{(a) 1) Downplays the loss of 70 park n' ride lot spaces at the Gilbane Properties lot, while admitting the plans for a South End transit center (which could include a parking garage to replace lost capacity at that lot) have not yet materialized. In fact, the proposed alignment of the new roadway and intersection would seriously compromise the viability of any future transit center at the Gilbane lot, including the flow of vehicles and buses into & out of that site.}

{(b) 2) Traffic analyses do not take into account the likely impact of shortcut-seekers who will cut through adjacent neighborhoods when coping with congestion at intersections burdened with increased traffic due to this project. Drivers escaping Pine St. backups will likely increase their cut-throughs on a variety of intersecting streets, including Locust, Birchcliff, Howard, and Kilburn. Cut-through traffic will increase the volume of traffic on these streets, and degrade the LOS at their intersections with Rte. 7. Increased car traffic will directly impact users of Callahan Park, including myself and most of the children and adults in my neighborhood.}

{(c) 3) I don't believe the traffic projections take into account the 'big picture' of the entrance/exit into the city for commuters from the south and east. Currently, in approaching the downtown from the Rte 7/exit 14, the fastest route to downtown (to the intersection of Main St.), via Shelburne Rd. & So. Union St., requires traversing 4 traffic signals and 3 four-way stop intersections. This can typically be accomplished in under 8 minutes at times other than rush hour.

By comparison, the proposed Champlain Parkway routing would funnel drivers through 8 traffic signals, some of which could require multiple signal sequences to navigate at rush hour. It's difficult to imagine anyone other than truck drivers choosing a route likely to take at least twice as long, all other things equal. This throws all the other traffic analyses used in the FSEIS into question.}

{(d) 4) That said, the FSEIS' best case analysis projects:

- *47% increase in traffic along Lakeside from the proposed Parkway terminus to Pine St.,*
- *9% increase (???) in traffic along Pine St. from Lakeside Ave. to Maple St., and a*
- *27% increase in traffic along Pine St. from Maple St. to Main St.*

... in the 2028 traffic projections of 'preferred' Build Alternative 2 vs. the No-Build Alternative. YET: the FSEIS goes on to proclaim (p. 4-154) that this increased traffic burden poses 'No Adverse Effect' on the quality of life in registered historic districts that would carry the burden of this increased traffic: the Battery St., Pine St., Queen City Cotton Mill and Lakeside Historic Districts. This is a deliberate misrepresentation, and again calls into question the reliability of all the conclusions presented throughout the document.}

{(e) 5) The responses to the questions raised about this project at the November 2006 hearing & subsequent comments received again downplay or dismiss many valid concerns about 'Build Alternative 2' raised by neighbors, South End businesses and other stakeholders. Those residents who would suffer the greatest increases in traffic (residents of Lakeside and the Battery St. Historic Districts) were barely even heard in this process, leading to serious questions about a systemic failure to address economic justice among those most affected.}

In fact, an unbiased review of the entire project's history reveals that as various rationales for more direct alignments of the roadway (the C-8 and Battery St. extension) were rejected by planners, its proponents avoided the most basic & obvious question: without providing the means to bypass truck and commuter traffic from the city's already overburdened street grid, and notwithstanding all the political capital expended on its behalf over the years, was it even worth building anymore?

After spending over $13 million in public funds over 33 years, it seems painfully obvious to this stakeholder that the simple answer is: NO. The primary beneficiary of this whole sorry process has been the same engineering firms and public officials whose jobs depend on expensive & endless studies hopelessly compromised by obvious conflicts of interest. Simply put, the FSEIS is riddled with flawed data generated by those who benefit from endorsing a project whose reason for being has long since expired. It's like asking a fox to assess the security of a chicken coop, while supplying him with a pair of wire cutters. You've got to consider the source.

The proposed 'Build Alternative 2' will not, by the planners' own data, accomplish anything worth the expenditure of $20 million in additional tax revenues. But it will significantly degrade the quality of life throughout the Pine St. corridor, while further impeding traffic flow than the 'no build' alternative. I believe there are much more elegant ways to address problems of truck traffic on Home Ave. and Flynn St. than building this road. Sometimes, it's better to build nothing than to construct something that makes things worse. Please reject this project.

Thanks for considering my comments & feedback.

Larry Lewack
51 Caroline St., Burlington VT 05401
(802) 660-1976

Response to Comment 7:

(a) The park and ride lot, operated by the City of Burlington and CCTA, is located on the Gilbane property and a portion of the City of Burlington's right-of-way for the C-2 Section of the Southern Connector/Champlain Parkway. The right-of-way for the C-2 Section of the Southern Connector/Champlain Parkway was previously acquired under the 1979 FEIS. The park and ride lot was initiated after the acquisition of the right-of-way for the Southern Connector/Champlain Parkway and has utilized this right-of-way since its inception. Approximately 266 parking spaces remain in the park and ride portion of Gilbane's parking lot.

The Southern Connector/Champlain Parkway project and the South End Neighborhood Transit Center project, as well as other redevelopment projects in the area, have been coordinated during their development and will continue to be coordinated as they are further developed.

(b) The CCMPO Regional Transportation Model, which was used to perform the traffic analyses, has the capability of considering alternate traffic routes. The traffic analysis did take alternative routes into account but, the traffic analysis did not indicate that cut-through traffic would occur. The installation of traffic signals at the intersections of Pine Street with Maple Street and Pine Street with King Street under Build Alternative 2 will provide improved LOS compared to the No-Build Alternative. A comparison of the 2028 Peak Hour Traffic Volumes for the No-Build Alternative and Build Alternative 2 shows an overall reduction in the traffic volumes on Locust Street, Birchcliff Parkway and Howard Street. Additionally, traffic calming measures may be considered for these and other side streets during the final design phases.

(c) The proposed traffic signals for the Champlain Parkway would be interconnected signals which optimize "green time" for mainline traffic.

(d) Traffic increases along Lakeside Avenue and Pine Street would occur under both Build Alternatives. The 27-percent increase in traffic along Pine Street from Maple Street to Main Street under Build Alternative 2 does not result in negative impacts to traffic compared to the 2028 No-Build Alternative. The anticipated Level of Service (LOS) is acceptable per VTrans' Level of Service Policy.

The No-Adverse Effect determination under Section 106 did consider the traffic volumes in the Pine Street Historic District and the Battery Street Historic District.

(e) A Public Hearing was held on November 30, 2006 for the 2006 DSEIS for the Southern Connector/Champlain Parkway allowing the public to comment. Comments on the 2006 DSEIS were accepted orally at the Public Hearing, electronically via e-mail, as well as in writing through the end of the comment period on December 29, 2006.

The City of Burlington has held numerous Public Informational Meetings since they have assumed responsibility for the project (refer to Section 6.3 of the 2009 FSEIS). At these meetings, members of the public have been allowed to provide their input on the development of the project.

For the 2009 FSEIS, comments were again accepted electronically via e-mail and in writing through the end of the comment period on November 2, 2009.

The City of Burlington has provided the public with numerous opportunities to voice their concerns with the Southern Connector/Champlain Parkway project. These opportunities have exceeded the requirements under NEPA.

Comment 8:

From: Paul Hochanadel [paul.hochanadel@gmail.com]
Sent: Monday, November 02, 2009 9:58 AM
To: Burl-SEIS
Subject: Southern connector comment

Hello,

I am very much in favor of this project. It makes sense to me to have another way into and out of town. ***{While I prefer the option that would cut along the train tracks behind Curtis Lumber, I would like to see this project move forward.}*** Perhaps that feature could be completed down the line if we discover that the traffic at the Maple St. intersection is unbearable.

Thanks,

Paul Hochanadel

97 Howard St

Burlington, Vt 05401

Response to Comment 8:

Refer to the Response to Comment 4(a).

Comment 9:

From: Mark Floegel [mark@markfloegel.org]
Sent: Monday, November 02, 2009 10:47 AM
To: Burl-SEIS
Subject: Southern Connector/Champlain Parkway

Dear Ms. Weston, Mssrs. Sikora and Davis,

I'm writing to comment on the Final Supplemental Environmental Impact Statement for the proposed Southern Connector/Champlain Parkway.

The project, as now described, would route all northbound traffic onto Pine Street, but no plans are in place to widen Pine Street to accommodate the additional traffic.

As current northbound traffic on Pine Street frequently backs up to between Kilburn and Pine Place, I fear the projected increase in traffic will make this siutation much worse.

{(a) I understand traffic signals will be installed at Pine/Maple and Pine/King, but I doubt these will have great effect in reducing the Pine Street backup.}

{(b) I also understand that a turning lane is proposed for Pine/Maple, but without widening roadways, this will create such a sharp turning radius (especially for large vehicles) that I believe it will result in greater, rather than fewer, impediments to the flow of traffic.}

{(c) Due to the conditions mentioned above, I think traffic on Pine Street will begin using Kilburn Street, Pine Place, Howard Street and Locust Street as routes for moving east and way from the backed up traffic. This will result in a significant increase in traffic through these residential neighborhoods and the hazards that go with it.}

I understand one purpose of the SC/CP is to divert commercial traffic off Flynn Avenue, but I think the unintended consequences of building the proposed project will be a degradation of local air quality from the backed up traffic on Pine Street, a diminunition of fuel efficiency for Burlington drivers and an increase in traffic hazards in the neighborhoods east of Pine Street.

I ask that no work proceed on this project unless and until this drawbacks can be adequately addressed.

Thank you for accepting these comments.

Mark Floegel

87 Howard St.

Burlington, VT 05401

802 658 5573

Response to Comment 9:

(a) As indicated in the 2009 FSEIS, the installation of traffic signals at the intersections of Pine Street with Maple Street and Pine Street with King Street under Build Alternative 2 will provide improved LOS compared to the No-Build Alternative.

(b) To clarify, there is no left-turn lane proposed at the intersection of Pine Street with Maple Street. The traffic analysis does not indicate the need for a left-turn lane at this intersection.

(c) Refer to the Response to Comment 7(b).

Comment 10:

From: Higgins.Elizabeth@epamail.epa.gov [Higgins.Elizabeth@epamail.epa.gov]

Sent: Monday, November 02, 2009 12:57 PM

To: Burl-SEIS

Cc: Timmermann.Timothy@epamail.epa.gov

Subject: comments on FSEIS for Burlington Southern Connector/Champlain Parkway Project

EPA's comments on the Final Supplemental EIS for the Burlington Southern

Connector/Champlain Parkway Project are attached.

Elizabeth A. Higgins

Director

Office of Environmental Review

U.S. EPA-New England

One Congress St.

Boston, MA 02114

617/918-1051

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

OFFICE OF THE
REGIONAL ADMINISTRATOR

October 29, 2009

Kenneth R. Sikora, Jr.
Environmental Program Manager
Federal Highway Administration
P.O. Box 568
Montpelier, Vermont 05601

Re: Final Supplemental Environmental Impact Statement, Southern Connector/Champlain Parkway Project, Chittenden County, Vermont CEQ # 20090336

Dear Mr. Sikora:

The Environmental Protection Agency, in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, has reviewed the Federal Highway Administration's (FHWA) Final Supplemental Environmental Impact Statement (FSEIS) for the Southern Connector/Champlain Parkway project in Burlington, Vermont.

The FSEIS evaluates proposed changes to portions of a previously approved 2.3 mile alignment extending from the I-189 interchange with Shelburne Street (US Route 7), northerly and westerly to the Burlington City Center District (CCD). This highway segment, known as the Burlington Southern Connector/Champlain Park Way Project, is intended to relieve severe traffic congestion and safety problems in the southern part of the City of Burlington. The preferred alternative described in the FSEIS is for the construction of a 1.9 mile road circumventing the Pine Street Barge Canal Superfund site. Based on our review of the FSEIS we have no objections to the project as proposed but offer the following suggestions for consideration as FHWA and the Vermont Agency of Transportation (VTRANS) work to finalize the project design.

Wetland Mitigation

While we do not believe the project will result in significant impacts to the aquatic environment, the project will require a federal Clean Water Act Section 404 permit from the US Army Corps of Engineers. EPA intends to work with the Corps and FHWA/VTRANS during the development of appropriate mitigation for wetland impacts, if required. A discussion of mitigation provided in Section 4.5.1 of the FSEIS explains that FHWA/VTRANS are planning to use mitigation previously completed in 1983 for the Northern Connector for this project. EPA disagrees with this approach as project impacts and federal mitigation requirements have changed since the original plan was developed (a)

over 26 years ago. EPA looks forward to working with FHWA/VTRANS and the Corps to develop a mitigation plan to address the project's impacts to wetlands. (a)

Low Impact Development (LID) and Stormwater

Since our review of the DSEIS several years ago we have increasingly encouraged project proponents to incorporate LID approaches into stormwater management plans. EPA recommends that FHWA/VTRANS consider the use of LID options for the project that can minimize the potential for indirect aquatic impacts to nearby waters of the United States. LID options include (but are not limited to) porous pavement, bio-retention, rain gardens, bio-swales, and gravel wetlands for paved surfaces. Additional information on LID options and specifications is available at the University of NH Stormwater Center website, and the websites included below. (b)

LID Websites
http://www.epa.gov/owow/nps/lid/costs07/factsheet.html
http://www.nrdc.org/water/pollution/storm/chap12.asp
http://www.lid-stormwater.net/background.htm

In addition, please feel free to contact Trish Garrigan of EPA's Office of Ecosystem Protection at 617-918-1583 to obtain a copy of draft technical guidance on LID and to learn more about LID options.

Other
We note an inaccuracy in the FSEIS regarding the Pine Street Barge Canal Coordinating Council (page 1-7) which states that, "the council is still active and continues to meet and sponsor technical workgroup meetings through which the public and other stakeholders in the superfund process can participate in investigative and remedial planning." The coordinating council's mission ended with the selection of a remedy in the 1998 record of decision and it is our understanding that it is no longer an active working group. (c)

Please contact Timothy Timmermann of EPA's Office of Environmental Review at 617-918-1025 with any comments or questions about this letter.

Sincerely,

Ira W. Leighton
Acting Regional Administrator

Response to Comment 10:

(a) FHWA agrees that the mitigation requirements have changed since the 1979 Selected Alternative was approved and also notes that the impacts to wetlands have been reduced to 0.694 acre under the Selected Alternative from approximately 2.7 acres under the 1979 Selected Alternative. FHWA will continue to coordinate with the EPA and ACOE during the permitting process.

(b) LID options, such as the use of porous pavements and bio-swales, have been considered and evaluated during the conceptual design phases of project. LID options may continue to be developed further during the final design phases of the project.

(c) Comment noted; however, coordination with the EPA's Remedial Project Manager for the PSBC indicated that the members of the council are still contacted for input on issues related to the PSBC.

Comment 11:

From: Carolyn Bates [cbates@burlingtontelecom.net]
Sent: Monday, November 02, 2009 3:08 PM
To: Burl-SEIS
Subject: Southern Connector NO NEW GOAL, REDUCE CARS GOING INTO BURLINGTON, REDUCE GLOBAL WARMING

CARS

Do we really want to put more cars in an already crowded area with a road that does not go far enough to really help the problems, and instead just makes things worse?

I totally agree with Larry Lewack's assessment. Please see his letter below. He has really studied the problem.

Also, as this road will NOT alleviate anything, and will most probably cause more problems than it will "fix," I am totally against this proposal. It will dump traffic into an area that cannot handle it. It will divide Pine St into two sections, making those in the southern part no longer a part of the local traffic, and the northern part burdened with even more traffic. The shops along Pine St. will suffer. We need these shops so we can WALK to them from our neighborhoods.

((a) The way to help the car situation is to park the cars OUTSIDE the city of Burlington, and have fast transit into the city.

There is a large road already built as park of the southern connector. Let us use this and the surrounding area around it to:

1. Make a commuter parking lot, multi story.}

{(b) 2. Have gas station, small market, hotel, restaurant, and other small amenities, within walking distance, or perhaps part of this parking lot

3. Put in much needed housing, that includes multi income people.}

{(c) 4. Run a fast small transit bus into and out of Burlington. It should go up and down Pine St.}

{(d) 5. Take the land that we have not built a road on and make it into a multi faceted space for bikes, walking, and fast transit. Have an enclosed rest stop with a bus stop with bathrooms, and access to water. Include a dog park. This way people from those neighborhoods have a NON CAR path to use to go into and out of town.}

And then

{(e) 1. Repair and fix up Pine St so it is a three lane road. The middle lane to be used for cars turning.} {(f) Sidewalks fixed, electric buried, and several benches for resting

and bus stops that are protected from the weather. This way people from my neighborhood, which abuts Pine St. (Five Sisters Neighborhood) will have a safe and fast way into the center of the city, and thus help us stop using our cars, as well.}

The GOAL of this town is to REDUCE CAR USE. It fits in with the global warming, and having lots of local places we can walk to for goods and services.

It is the GOAL of the FUTURE. This Southern Connector was the goal of the PAST, 30 years ago, when everyone was trying to put more cars into the city.

PLEASE PLEASE TAKE THE FUNDING FOR THIS ROAD AND GIVE IT TO BURLINGTON TO REDUCE THE NUMBER OF CAR TRIPS INTO AND OUT OF THE CITY, REDUCE GLOBAL WARMING, AND BE A GOAL OF THE FUTURE.

1. FIX UP PINE ST. for better mass transit.

2. INCLUDE NEW SMALL BUSES FOR RAPID TRANSIT,

3. PUT COMMUTER PARKING OUTSIDE OF THE CITY IN THE ROAD THAT IS ALREADY BUILT

AS WELL AS THE SEMI ABANDONED SHOPPING CENTER NEXT TO IT. WHERE K MART IS LOCATED.

{(g) Below is Larry Lewack's letter to you. I support everything that he is saying, as well.

I write to express strong objections to the project, as presented in the draft FSEIS. I am a homeowner in an abutting neighborhood, and use the affected streets on a daily basis to get myself to work and city services and my children to school. The building of this project as proposed would significantly degrade the transportation infrastructure and quality of life in my neighborhood and adjacent neighborhoods. In my opinion, it would also not accomplish its stated design objectives, and make existing traffic congestion problems worse.

I have spent several hours reviewing the FSEIS. The document reveals several troubling flaws of logic and analysis, including:

1) Downplays the loss of 70 park n' ride lot spaces at the Gilbane Properties lot, while admitting the plans for a South End transit center (which could include a parking garage to replace lost capacity at that lot) have not yet materialized. In fact, the proposed alignment of the new roadway and intersection would seriously compromise the viability of any future transit center at the Gilbane lot, including the flow of vehicles and buses into & out of that site.

2) Traffic analyses do not take into account the likely impact of shortcut-seekers who will cut through adjacent neighborhoods when coping with congestion at intersections burdened with increased traffic due to this project. Drivers escaping Pine St. backups will likely increase their cut-throughs on a variety of intersecting streets, including Locust, Birchcliff, Howard, and Kilburn. Cut-through traffic will increase the volume of traffic on these streets, and degrade the LOS at their intersections with Rte. 7. Increased car traffic will directly impact users of Callahan Park, including myself and most of the children and adults in my neighborhood.

3) I don't believe the traffic projections take into account the 'big picture' of the entrance/exit into the city for commuters from the south and east . Currently, in approaching the downtown from the Rte 7/exit 14, the fastest route to downtown (to the intersection of Main St.), via Shelburne Rd. & So. Union St., requires traversing 4 traffic signals and 3 four-way stop intersections. This can typically be accomplished in under 8 minutes at times other than rush hour.

By comparison, the proposed Champlain Parkway routing would funnel drivers through 8 traffic signals, some of which could require multiple signal sequences to navigate at rush hour. It's difficult to imagine anyone other than truck drivers choosing a route likely to take at least twice as

long, all other things equal. This throws all the other traffic analyses used in the FSEIS into question.

4) That said, the FSEIS' best case analysis projects:

- *47% increase in traffic along Lakeside from the proposed Parkway terminus to Pine St.,*
- *9% increase (???) in traffic along Pine St. from Lakeside Ave. to Maple St., and a*
- *27% increase in traffic along Pine St. from Maple St. to Main St.*

... in the 2028 traffic projections of 'preferred' Build Alternative 2 vs. the No-Build Alternative. YET: the FSEIS goes on to proclaim (p. 4-154) that this increased traffic burden poses 'No Adverse Effect' on the quality of life in registered historic districts that would carry the burden of this increased traffic: the Battery St., Pine St., Queen City Cotton Mill and Lakeside Historic Districts. This is a deliberate misrepresentation, and again calls into question the reliability of all the conclusions presented throughout the document.

5) The responses to the questions raised about this project at the November 2006 hearing & subsequent comments received again downplay or dismiss many valid concerns about 'Build Alternative 2' raised by neighbors, South End businesses and other stakeholders. Those residents who would suffer the greatest increases in traffic (residents of Lakeside and the Battery St. Historic Districts) were barely even heard in this process, leading to serious questions about a systemic failure to address economic justice among those most affected.

In fact, an unbiased review of the entire project's history reveals that as various rationales for more direct alignments of the roadway (the C-8 and Battery St. extension) were rejected by planners, its proponents avoided the most basic & obvious question: without providing the means to bypass truck and commuter traffic from the city's already overburdened street grid, and notwithstanding all the political capital expended on its behalf over the years, was it even worth building anymore?

After spending over $13 million in public funds over 33 years, it seems painfully obvious to this stakeholder that the simple answer is: NO. The primary beneficiary of this whole sorry process has been the same engineering firms and public officials whose jobs depend on expensive & endless studies hopelessly compromised by obvious conflicts of interest. Simply put, the FSEIS is riddled with flawed data generated by those who benefit from endorsing a project whose reason for being has long since expired. It's like asking a fox to assess the security of a chicken coop, while supplying him with a pair of wire cutters. You've got to consider the source.

The proposed 'Build Alternative 2' will not, by the planners' own data, accomplish anything worth the expenditure of $20 million in additional tax revenues. But it will significantly degrade the quality of life throughout the Pine St. corridor, while further impeding traffic flow than the 'no build' alternative. I believe there are much more elegant ways to address problems of truck traffic

on Home Ave. and Flynn St. than building this road. Sometimes, it's better to build nothing than to construct something that makes things worse. Please reject this project.)

Thank you for listening.

Carolyn L. Bates

Nov 2, 2009

Carolyn L. Bates Photography

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Response to Comment 11:

(a) Transportation Demand Management (TDM) measures include improving public transit, creation of park and ride facilities that encourage car pooling and/or transit use, increased bicycle commuting opportunities, and working with employers to provide alternatives to single occupant vehicle use by employees. The objective of TDM is to reduce vehicular volumes within urban areas.

TDM options were considered as alternatives to the proposed project action. There have been considerable efforts focused on TDM measures within the City of Burlington in the past. Analysis indicates that TDM measures alone are not sufficient enough to address the project purpose and need. The Selected Alternative does not preclude the implementation of TDM measures.

(b) These amenities would not be eligible for federal funding as part of the Southern Connector/Champlain Parkway. The Selected Alternative does not preclude the implementation of amenities by other parties.

(c) Refer to the Response to Comment 6(b).

(d) The Southern Connector/Champlain Parkway does incorporate accommodations for pedestrian and bicyclists, including shared-use paths and shared-lanes. The use of shared-use paths alone would not meet the Purpose and Need of the Southern Connector/Champlain Parkway.

(e) Widening Pine Street to accommodate a two-way opposing left turn lane would not satisfy the Purpose and Need for the Southern Connector/Champlain Parkway project and would potentially impact the Pine Street Historic District and Battery Street Historic District.

(f) The Selected Alternative incorporates sidewalks along both sides of Pine Street from Lakeside Avenue to Main Street. Sidewalks and curb ramps will be in compliance with ADA standards.

Since the publication of the 2006 DSEIS, VTrans has established a policy regarding the enhancements to transportation projects. Therefore, the undergrounding of utilities along the C-6 Section would no longer be a project eligible expense. Implementation of the Selected Alternative does not preclude the undergrounding of utilities by other parties.

The Southern Connector/Champlain Parkway could provide landscaping along Pine Street where appropriate. The Southern Connector/Champlain Parkway does not preclude the development of other amenities along Pine Street..

(g) Refer to the Responses to Comments 7(a) through 7(e).

Comment 12:

Wayne,

I'm sending you a copy of a previous letter in hopes that it will be considered in this latest round of review of the Champlain Parkway project. I think all my arguments and suggestions are still valid and hope they will help to influence a reasonable approach to the situation. Having spent many years commuting on Pine Street when working at GE, I can imagine the disruption for commuters as well as the businesses involved if the contract 6 section were built, not to mention the cost and disruption of the railyard.

In particular, using this project as a pilot to demonstrate the potential cost savings by Federal funding of transit operations, if successful, could lead to other savings on other projects.

Sincerely,

Lew Wetzel

P.O.Box 300
Colchester, VT 05446-0300
Dec 15, 2006

Mr. Wayne Davis
VTrans
Drawer 33
Montpelier, VT 05633

Re: Champlain Parkway

Dear Mr. Davis;

Although I do not live in the South end of Burlington, I have been on the CCRPC and MPO boards and Technical Advisory Committee for nearly 10 years, so I have a number of comments and suggestion regarding the Champlain Parkway. I have been following the proposed project for years and attended the public hearing on November 30. It is encouraging to see that at least Contract 2, which makes a lot of sense may actually go to construction fairly soon. However I had thought that Dawn Terrill had decided that Contract 6 should not be built, and I agree with that decision.

Building Contract 2 up to the Park & Ride lot on Lakeside makes a lot of sense, particularly with shuttle service to downtown. Bus service would be practical, but perhaps better, would be a Budd car on the adjacent railroad track. It would be faster than the bus and avoid increasing congestion on Pine Street.

Building Contract 6 would be extremely expensive, particularly because the real objective is to get Transportation dollars (at 98% yet!) to replace all the utilities underground. I suspect even the high current estimate would not be enough, and the disruption of traffic and access to Pine Street businesses during the 2 or 3 years of construction would be disastrous. I have asked the Burlington Public Works planners several times what their plans are for alternative routes during construction and they have no plans, other than Shelburne Street.

Most of the residents speaking at the public hearing were concerned about increased traffic on Pine street and the addition of traffic lights would only exacerbate the problems. The best solution is to make it convenient to use existing park & ride facilities, and build more, further out of town, Frequent express bus service and Budd cars would make it attractive to commuters and save them time and money. One idea which I've been suggesting for years would be to try to convince Federal Highways to fund the operational costs of transit if it can be shown that it would be much less costly than new construction. I've talked with Chris Jolly about this. Contract 6 of the Champlain Parkway would be an excellent project to demonstrate the cost-effectiveness of this approach. (a)

Perhaps the worst waste of money would be the re-arrangement of the railyard if that alternative route were chosen. Most transportation planners agree that The railyard on the waterfront makes no sense and it should be phased out as soon as a new transload facility can be sited and built. This should be a very high priority for VTrans, because it will obviously take a long time to locate and acquire a suitable site, and get the rail operators onboard. With the railyard on the Burlington waterfront, the full Champlain Parkway could encourage more trucks to use it and further increase traffic in the neighborhood. (b)

Please consider these suggestions from someone with no axe to grind, other than as a taxpayer, who has studied the issues for many years on the CCRPC and the MPO.

Singerely,

Lewis K. Wetzel
Colchester
862 9093

Response to Comment 12:

(a) Refer to the Response to Comment 6(b).

Also, refer to the Response to Comment 11(a).

(b) Refer to the Response to Comment 1.

Also, refer to the Response to Comment 4(a).

K. Action

Based on the above information, the 1979 Final Environmental Impact Statement and the 2009 Final Supplemental Environmental Impact Statement, I am selecting Build Alternative 2 for further implementation.

Ernest J. Blais, Division Administrator
Federal Highway Administration – Vermont Division
Montpelier, Vermont

1-13-2010
Date