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Tennessee Chapter
3340 Perimeter Hill Drive
Nashville, TN 37211

September 2, 2009

David K. Baker
US Army Corps of Engineers
151 Patton Avenue, Room 208
Asheville, NC 28801-5006

PUBLIC COMMENT REGARDING TIP A9, Sections B and C (Stecoah to Robbinsville section)

Dear Mr. Baker:

The Tennessee Chapter Sierra Club is pleased to provide public comments on the proposed relocation and construction of Hwy 74 (Corridor K sections B and C) between Stecoah and Robbinsville, NC on behalf of its 7,000 members, a significant number of whom hike, backpack, fish, and otherwise recreate in the area of western NC impacted by this proposed road project.

We urge the Army Corps of Engineers (COE) to acknowledge that it cannot, consistent with the mandate of the Clean Water Act Section 404(b)(1) guidelines, issue a Department of the Army permit for any of the alternatives currently proposed by the N.C. Department of Transportation (NCDOT) for the Route 74 Relocation. Because it is unreasonably committed to a four-lane, interstate standard roadway, NCDOT has refused to consider a practical alternative - targeted improvements to a two-lane footprint for US 129 and NC143 combined with economic development strategies, which would achieve NCDOT's overall project objectives with far less environmental damage. Furthermore, the alternatives proposed by NCDOT will cause substantial degradation of aquatic ecosystems, fail to minimize harm, cannot be fully assessed due to the lack of sufficient information to determine the extent of their water quality impacts, and cannot survive public interest review. Our specific objections to the issuance of a Section 404 permit are as follows:

1. NCDOT has assumed that this project requires a four-lane divided highway and has failed to consider the alternative of an improved two-lane corridor on the approximate existing footprints of US 129 and NC 143.

2. The project's stated purposes would be better served at less cost and with less impact to mountain streams and wetlands by pursuing well-designed upgrades and improvements to the existing primary roads in Graham County (US 129 and NC 143).
3. NCDOT records reveal that the tunnel planned by NCDOT for two of their alternatives would be unnecessary if the road had a smaller, two-lane footprint.
4. An alternative of targeted upgrades to existing roadways on a two-lane footprint would satisfy any legitimate purpose for the Corridor K project. While NCDOT states that part of the project's purpose is to improve road linkage and highway capacity, their data show that there is no transportation need for such a massive highway. NCDOT projects that current roads will provide acceptable levels of service in 2030.
5. NCDOT's refusal to consider an improved two-lane corridor cannot be justified by the stated purpose of encouraging economic development in Graham County with a four-lane highway; no data to support that assumption has been provided. While possessing no expertise in economic development, NCDOT has based its "need" for this project on the inhibited economic development of Graham County.
6. NCDOT must consult with true economic development strategists, not road engineers, when considering alternative approaches to improving economic conditions in Graham County, such as considering upgrades to existing highways US 129 and NC 143, thus resolving safety and service concerns at far lower cost and much less environmental damage.
7. NCDOT cannot justify its insistence on a four-lane design as a stated objective of completing the Appalachian Regional Commission (ARC) Corridor K project because ARC has not required that Corridor K be a four-lane highway.
8. NCDOT cannot proceed without considering, disclosing and seeking USACOE review of the impacts of the full North Carolina project from Andrews to Stecoah, including the cost prohibitive segment between Andrews and Robbinsville, and considering the impacts of the full Corridor K project, from Cleveland, TN, to Dillsboro, NC.
9. The extensive grading projected by NCDOT would disturb pyritic, acid-producing rock formations that would pollute this area's clean waters and trout streams, yet this likelihood has not been adequately addressed nor assessed. Such rock formations are already revealed in the exposed road cuts on NC143 at Stecoah gap and surrounding ravines.
10. NCDOT's proposed four-lane highway construction would cause approximately 20,000 feet of stream impacts, producing acidic runoff for decades after construction is complete, yet a long-term monitoring and remediation plan is absent from the plan.

11. Water quality is further threatened by the stability of graded slopes which are characterized by unstable rock that have extensive potential for slope failures during construction and long after the project is completed as evidenced by similar failures on I-40, the Great Smoky Mountains National Park, and the Blue Ridge Parkway.
12. The geological literature (Ackers, 1995) reveals that "landslides have plagued the section of SR143 above the west (tunnel) portal," and that "some of the ravines on that slope show evidence of active debris flow...or debris avalanche mass movement. The proposed roadway lies in the path of those movements which could be triggered by storms with a frequency of 50 years."

IN CONCLUSION: Because other practicable, less environmentally damaging alternatives exist that will meet NCDOT's stated purpose and need for the project, USACOE should not issue a permit for this project as currently proposed.

The Tennessee Chapter Sierra Club appreciates the opportunity to provide these comments.

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