

Southeastern Regional Parkway

Position Paper

Mr. Ken Wilkinson, SEPG Project Engineer

Virginia Department of Transportation

Dear Mr. Wilkinson,

The Back Bay Restoration Foundation (BBRF) is a 501(c) (3) non-profit group committed to the restoration, preservation and enhancement of Back Bay , its watershed, immediate tributaries and adjacent environs. We have approximately 700 members and appreciate the opportunity to comment on the draft environmental impact statement (DEIS).

A number of BBRF members attended the Public Hearing at the Virginia Beach Pavilion or the Chesapeake Conference Center the week of 11 July. I have learned that the comments period has been extended until August 8, 2005 . Even with this extension, it is not a generous comment period given the extent and timing of the proposed project. VDOT released an EIS document consisting of more than 300 pages, plus reference material just a few weeks prior to the Hearings. It's very difficult for most people who work to devote the time necessary to read and evaluate the project in short order.

I do question the need for the whole project. As we know there is still a strong possibility that NAS Oceana will be closing before any Southeast Parkway could be completed. **Regarding hurricane evacuation, it is clear that getting traffic to I-64 faster serves no purpose, because that is where the real bottleneck occurs.** The widening of I-64 between I-464 and Bowers Hill is a high priority, but that improvement is not in the 2026 Long Range plan due to funding constraints. **The I-64 and Oak Grove Connector would be a better use of funds. The section of I-64 between Oak Grove and Bowers Hill is the only passage to the point at which the western escape routes on RT 58 and RT 460 converge. These projects would also involve relatively minimal impacts to aquatic resources.**

Each day when I go to work I travel along Elbow Rd and Indian River Rd. At no point during the day have I encountered significant traffic problems. However, Indian River Rd has NO shoulders, which is dangerous. Improvements should be made to include **shoulders and bicycle paths along the length of Indian River Rd.** It is also noted that the DEIS dismisses light rail without mentioning the new developments at Town Center .

The construction of the SEP would result in the direct loss of far more wetlands than any roadway project constructed in Virginia in modern times. **It is highly unlikely that the functions and values of some of the wetland types to be lost as a result of the project, such as deep swamp or semi-permanently inundated wetlands, can be replaced by restoration of previously converted croplands.**

This is a critical project for Back Bay - it cuts through the headwaters and much of the drainage, **cutting off hydrologic flows to the Bay, already on the list of impaired waters by the state.** This project cuts across the headwaters and upper drainage areas of the Back Bay Wildlife Refuge and the North Landing River that drains into the North Carolina coastal bays. The project area is critical to the health of these watersheds, yet there is no discussion of those broader impacts. The Back Bay Wildlife Refuge is under great pressure from development. It is undergoing a water quality/TMDL evaluation that this project may impact. **Yet the Draft EIS doesn't even deal with the Back Bay/Albemarle/Southern Rivers issues. On the maps that I saw at the Hearing, North Landing River wasn't even shown!**

The bottomland hardwood wetlands associated with Gum Swamp, West Neck Creek, and the North Landing River are of particularly high value, and the areas where the SEP is proposed to cross these systems are largely undisturbed by other roadways or development. There are **mature stands of Swamp Tupelo , Swamp Cottonwood and Cypress .** These bottomland hardwood wetlands form critical habitat for birds needing deep woods such as the **Prothonotary Warbler, which is declining.** It is also excellent habitat for Wood Ducks, Woodpeckers and Barred Owls.

The document indicates that the floodway associated with Gum Swamp , North Landing River , and West Neck Creek may be bridged. The floodway and 100-year floodplain associated with these three waterways should be bridged to minimize project impacts to these high value aquatic resources. However, these areas will be impacted even if crossed on bridges due to fragmentation of the habitat and disruption of the hydrology. **Bridging would only reduce the preferred alternative's wetland impact by 26 acres (about 10%).** The benefits and effects of other methods of minimization should be quantified. Describing minimization possibilities without evaluating them is misleading.

Prior versions of the project were criticized for spawning development, sprawl, and increasing the impervious surface area in the watersheds of the project area. At the public information sessions in May 2004, I understand that these past claims were dismissed by staff with the assertion that the development had already taken place, without the project having been built and therefore does not have to be considered as part of this new project proposal. While this may hold for direct impacts, indirect and cumulative impacts **MUST** consider the development that has already taken place. Cumulative impacts analysis involve past, present, and reasonably foreseeable actions.

The DEIS mentions the Chesapeake and Virginia Beach agricultural lands and open space programs as part of local mitigation efforts. These programs are subject to change with political and development pressures. **The Virginia Beach agricultural land**

program and the city's open space program currently have inadequate funding to be significant mitigation factors.

The fact is that significant areas are developed, with wetlands and watersheds already adversely impacted within the project area. **This only means that the remaining natural resources within this project area have a HIGHER ecological value** than similar project impacts in a pristine environment. This is due to the assumed impairment of the health and resiliency of the affected ecosystems by this past development, making protection of any additional wetlands and watersheds critically more important.

Given available information, Back Bay Restoration Foundation concludes that the need for this roadway is not supported, that the analysis of environmental impacts is incomplete, and that the environmental impacts outlined in the DEIS exceed the benefits. We are therefore opposed to the SEP and believe the I-64 and Oak Grove Connector portion is all that is necessary on this project.

Respectfully submitted,

Susan M. Admire

Executive Director

Back Bay Restoration Foundation