CULLODEN INTERCHANGE PROJECT
Cabell and Putnam Counties, West Virginia

FINDING OF NO SIGNIFICANT IMPACT

State Project Number: U306-64-31.65 00
Federal Project Number: NHPP-2317(001)D

Prepared for:
U.S. Department of Transportation
Federal Highway Administration

West Virginia Department of Transportation
Division of Highways

March 25, 2020

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U.S. Department of Transportation
Federal Highway Administration
West Virginia Division
and
West Virginia Department of Transportation
Division of Highways

The Federal Highway Administration (FHWA) and the West Virginia Department of Transportation, Division of Highways (WVDOH) have prepared an Environmental Assessment (EA) to identify and evaluate the potential environmental impacts associated with the proposed construction of an interchange, modify Benedict Road and construct a connector road between Virginia Avenue and US 60 in Culloden in Cabell and Putnam Counties, West Virginia.

The EA was issued on November 15, 2019 and is incorporated here by reference. The EA analyzes the potential impacts of the proposed action on the natural, physical, socioeconomic, and cultural (historic and archaeological) environments. In accordance with the National Environmental Policy Act (NEPA) of 1969, as amended, the Council on Environmental Quality (CEQ) regulations implementing NEPA (40 CFR 1500-1508), and FHWA's Environmental Impact and Related Procedures (23 CFR 771), two Build Alternatives and the No-Build Alternative were considered to address the project purpose and need. The EA determined that the Build Alternatives have similar impacts to most resources; they differ primarily in the acreage of wetlands impacted, the number of residential and business displacements, and the number of hazardous waste sites affected. However, Alternative 2 avoids the need to construct a bridge over the railroad, which substantially increases overall project and lifecycle maintenance costs and construction schedule duration. After careful consideration of all impacts and the purpose and need for the project, WVDOH and FHWA identified Alternative 2 as the EA Preferred Alternative. The design of the EA Preferred Alternative has been further refined since issuance of the EA and is the Selected Alternative addressed in this FONSI.

Direct, indirect, and cumulative impacts on the natural, physical, socioeconomic, and cultural environments from the Selected Alternative are not anticipated to be significant.

This Finding of No Significant Impact (FONSI) was prepared according the Council on Environmental Quality Regulations (40 CFR Parts 1500-1508). FHWA has determined that the construction of the Selected Alternative has no significant impact on the human environment within the meaning of the National Environmental Policy Act of 1969 (42 USC 4321 et seq.). This FONSI is based on the EA, which was independently evaluated by the FHWA and determined to adequately and accurately discuss the need, environmental issues and impact of the project, and appropriate mitigation measures. It provides sufficient evidence of analysis for determining that preparation of an Environmental Impact Statement is not required.

3-30-20

Date of Approval

Federal Highway Administration
West Virginia Division

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ACRONYMS AND ABBREVIATIONS

CEQ	Council on Environmental Quality
CNE	Common Noise Environment
EA	Environmental Assessment
EJ	Environmental Justice
EPA	Environmental Protection Agency
ESA	Environmental Site Assessment
FHWA	Federal Highway Administration
FONSI	Finding of No Significant Impact
LEP	Limited English Proficiency
LOS	Level of Service
NEPA	National Environmental Policy Act of 1969
NRCS	Natural Resources Conservation Service
ROW	Right-of-Way
USACE	U.S. Army Corps of Engineers
USFWS	U.S. Fish and Wildlife Service
WUS	Waters of the U.S.
WVDEP	West Virginia Department of Environmental Protection
WVDOH	West Virginia Division of Highways
WV SHPO	West Virginia State Historic Preservation Office

1.0 PROJECT SUMMARY

1.1 Overview

The West Virginia Department of Transportation, Division of Highways (WVDOH), in cooperation with the Federal Highway Administration, West Virginia Division (FHWA), proposes to construct an interchange, modify Benedict Road, and construct a connector road between Virginia Avenue and US 60 in Culloden in Cabell and Putnam Counties, West Virginia (Figure 1), to address increased traffic and congestion on I-64 between Hurricane and Milton. The interchange would also provide an additional outlet for round-trip daily traffic moving between the communities of Hurricane and Huntington. Overall existing traffic Levels of Service (LOS) are good; however, the forecast future travel demand shows that several intersections and movements are anticipated to reach unacceptable levels of service and delay by 2040.

An Environmental Assessment (EA) was prepared to address the environmental impacts of the project. In the EA, WVDOH and FHWA considered a range of alternatives and their potential environmental impacts. Because of the unique parameters associated with the study area, options for new location alternatives are limited and WVDOH identified only one feasible location for the I-64 interchange and modifications to Benedict Road. WVDOH considered two different alternative configurations for a new US 60 connector road. The EA was issued on November 15, 2019 for public review and comment and is incorporated here by reference.

After careful consideration of all impacts and the purpose and need for the project, WVDOH and FHWA identified Alternative 2 as the EA Preferred Alternative. The EA Preferred Alternative avoids the need to construct a bridge over the railroad, which substantially increases overall project and lifecycle maintenance costs and construction schedule duration. The design of the EA Preferred Alternative has been further refined since issuance of the EA and is the Selected Alternative addressed in this Finding of No Significant Impact (FONSI).

1.2 Purpose and Need

The purpose of the project is to efficiently and effectively serve the transportation needs of through travelers and residents of the area. The project resulted from growing concerns regarding increased traffic and congestion on I-64 between Hurricane and Milton.

The need for the project is to reduce existing and forecasted traffic congestion and delays associated with the Hurricane Creek Road/I-64 interchange and provide additional access for round-trip daily traffic and freight truck movements from the Hurricane area to Huntington. Overall existing traffic LOS are good; however, the forecast future travel demand shows that several intersections and movements are anticipated to reach unacceptable levels of service and delay by 2040. This anticipated degradation in traffic operations supports the need for additional roadway capacity and/or access options.

A traffic analysis was conducted as part of the *I-64 Culloden Interchange at Benedict Road Interchange Justification Report* (HNTB 2019), which was compiled in 2019 to satisfy the operational and safety analysis requirements of the 2017 *FHWA Policy on Access to the Interstate System*. This report in its entirety is included as Appendix A.

Figure 1. Project Location

2.0 SUMMARY OF SELECTED ALTERNATIVE

The EA Preferred Alternative (Alternative 2) is the Selected Alternative. It includes the following project components, which are proposed without any options or variations:

- I-64 Interchange: The diamond interchange and bridge improvements were previously designed in the 1960s. The designs were updated to reflect current design standards and modified to include adjustments for the I-64 ramp connection points as affected by the profile grade, as well as modifications to Benedict Road.
- Benedict Road Modifications: Currently, Benedict Road is a two-lane roadway with a posted speed limit of 25 mile per hour. Benedict Road connects to Virginia Avenue and provides direct access to 14 residential parcels. The proposed modifications construct a new three-lane road from the new interchange to Virginia Avenue, including an additional turn lane at Virginia Avenue, and converts existing Benedict Road into a residential frontage road.

The Selected Alternative also includes a new US 60 connector road which connects Benedict Road to US 60 by extending to the west in the vicinity of Whites Mobile Home Park and south. The Selected Alternative avoids crossing over the railroad and requires a major drainage structure to convey Indian Fork Creek under the proposed US 60 connector road. Figure 2 shows the EA Preferred Alternative as presented in the EA; Figure 3 shows the design refinements incorporated into the Selected Alternative since issuance of the EA.

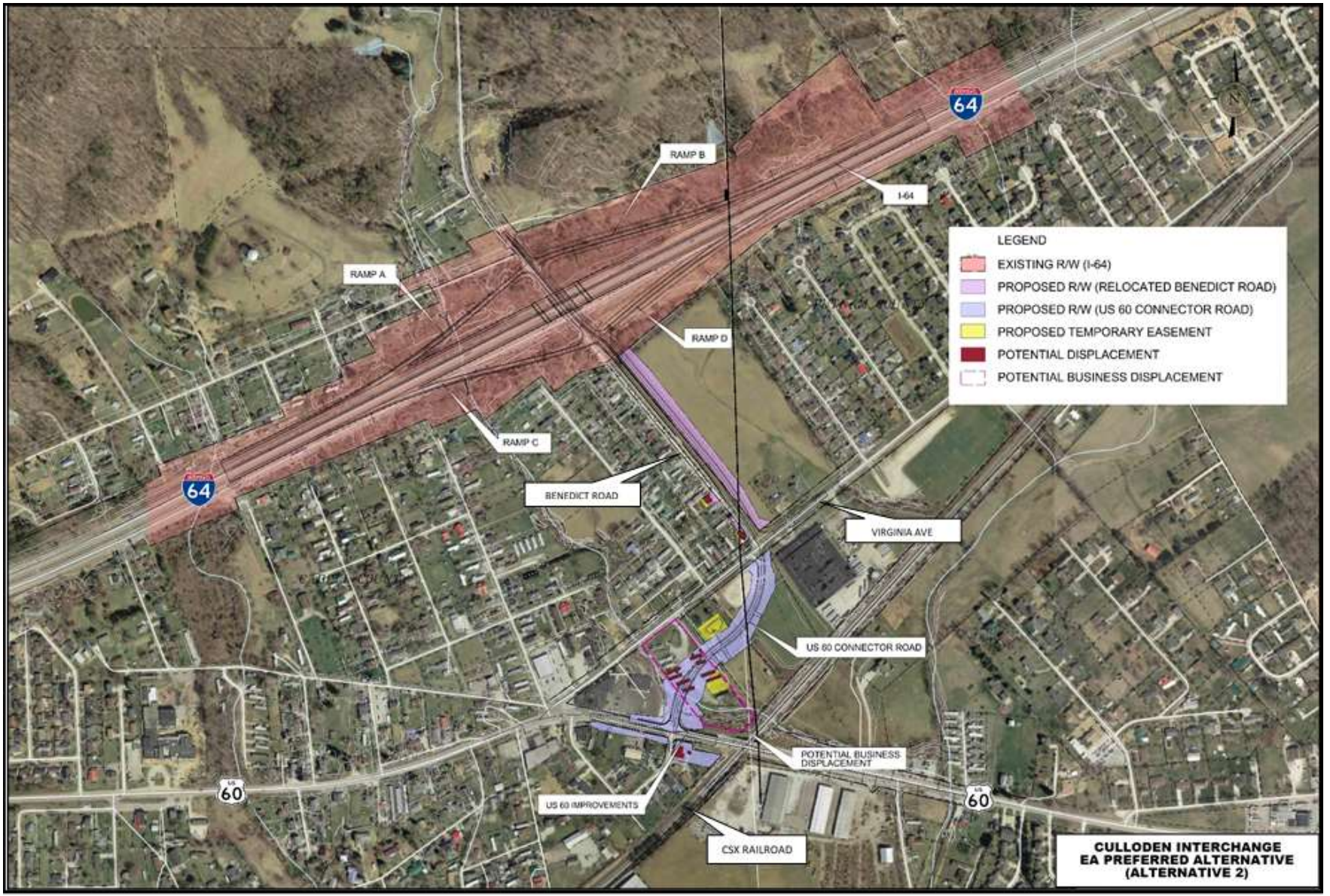


Figure 2. EA Preferred Alternative

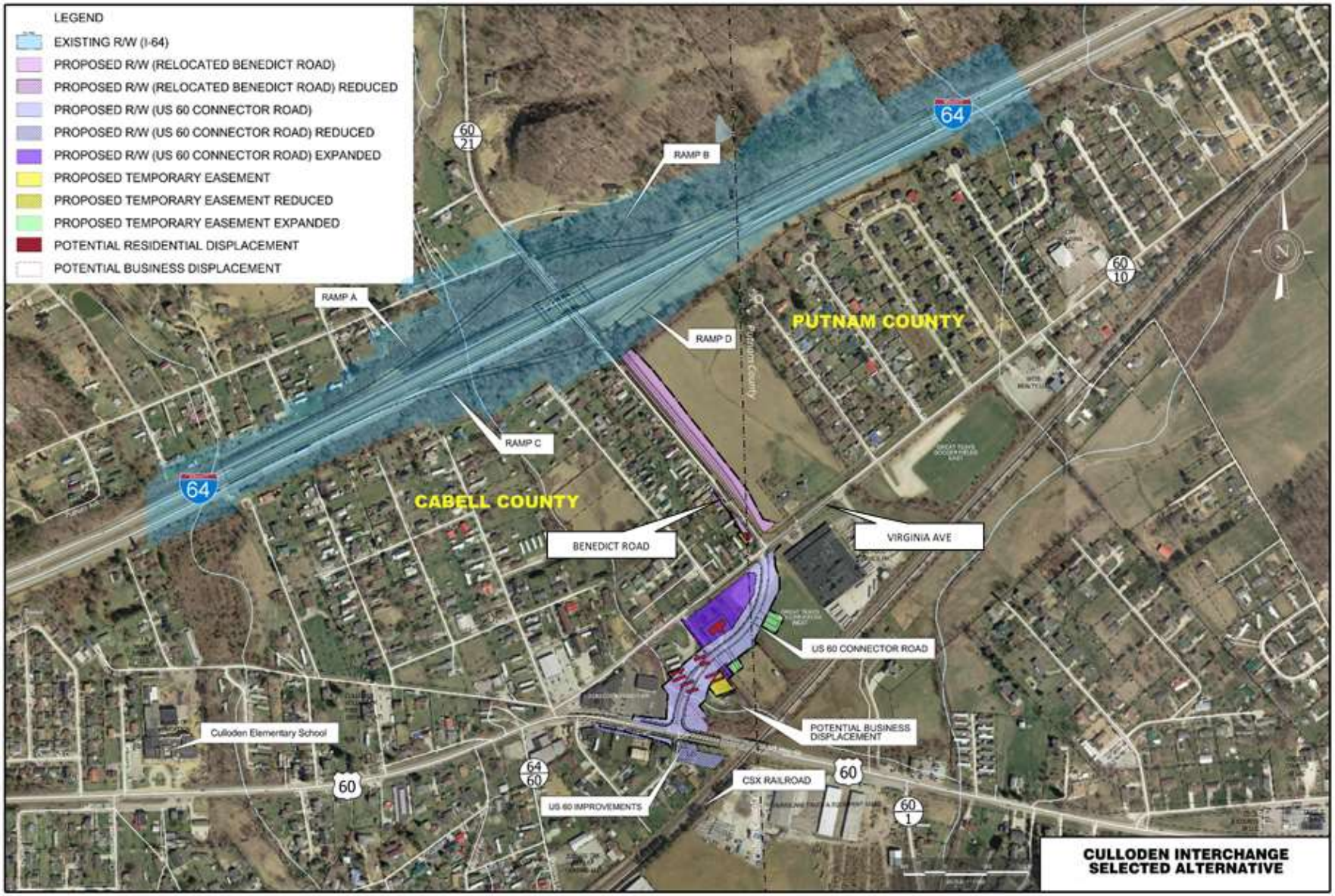


Figure 3. Selected Alternative

Since the analysis for the EA was completed, the engineering team has refined the design to reduce the number of displacements and impacts to resources. The potential impacts from the EA Preferred Alternative and the Selected Alternative are summarized in Table 1.

Table 1. Summary of Impacts of the EA Preferred Alternative and the Selected Alternative

Resource/Element	EA Preferred Alternative	Selected Alternative
Cost (includes construction, right-of-way, and utilities)	$29.65 million	**$40.77 million**
Socioeconomics and Human Environment		
Economics and tax base	Potential beneficial impact due to improved accessibility/mobility to/from I-64 and surrounding areas	No change
Community facilities/services	Potential beneficial impact due to improved emergency response times. Potential adverse impact due to loss of Great Teays Soccer Fields West.	No change
Community cohesion	Potential beneficial impact due to new access to I-64, improved roadway capacity and intersection LOS, and improvements to local roadways.	No change
Utilities	Potential relocation of existing utilities or installation of new utilities may cause temporary disruptions to local properties, services, and traffic.	No change
Transportation	Beneficial impact from anticipated decreases in traffic congestion.	No change
Residential/Business displacements	11 residential 1 business	**10 residential** 1 business
Environmental Justice populations	No impact	No change
Natural Resources		
Land use and land cover	12.19 acres of forest 10.61 acres of grassland/pastureland/agricultural land 3.58 acres of barren/developed land	No change to forest No change to grassland/pasture land/agriculture land **4.28 acres of barren/developed land**
Rare, threatened, and endangered species	No impact	No change
Wetlands	0.53 acre	**0.27 acre**
Streams	631 linear feet	**525 linear feet**
National/State Scenic Rivers	No impact	No change
Floodplains	No impact	No change
Prime farmlands/farmlands of state/local importance	No impact	No change
Geology	No impact	No change
Groundwater	No impact	No change

Resource/Element	EA Preferred Alternative	Selected Alternative
Physical Resources		
Air quality	Minor, temporary impacts in dust/emissions from construction equipment.	No change
Noise	Minor, temporary increases in noise during construction. Nine common noise environments contained receptors with predicted future noise levels approaching or exceeding the federal noise abatement criteria; noise abatement not feasible.	No change
Hazardous waste sites	Potential impact to 9 sites that have or potentially have identified environmental conditions.	No change
Section 4(f) and 6(f) resources	Resource not present	No change
Cultural Resources		
Architectural resources	Resource not present	No change
Archaeological resources	Resource not present	No change
National Historic Landmarks	Resource not present	No change
Sites/districts eligible for the National Register of Historic Places	Resource not present	No change

3.0 AFFECTED ENVIRONMENT AND MITIGATION

Each section within this chapter identifies the probable impacts to the resources of the study area, changes to those impacts due to design refinements made after the EA was issued, and proposed mitigation efforts and strategies to address the potential impacts from the Selected Alternative to these resources, where appropriate.

3.1 Socioeconomics

3.1.1 Economics and Tax Base

No changes in impacts to economics and tax base have occurred since issuance of the EA. The Selected Alternative could affect long-term planning and expansion opportunities for local businesses, which may have a negative effect on future employment and tax revenues. Some business activities may be disrupted by construction activities, including but not limited to access modifications, changes to parking and internal circulation, temporary traffic diversions, and road closures. However, the introduction of the new interchange opens the possibility for future commercial and residential development and provides enhanced mobility of freight and services and expected decreases in traffic congestion.

Enhancements to interstate routes such as the project are typically accompanied by associated increases in local employment and tax revenue. The Selected Alternative is likely to benefit the

local economy due to improved accessibility and mobility to and from I-64 and the surrounding areas. The construction phasing for this large-scale roadway project would be expected to introduce a sizable number of construction-related jobs. Local businesses may also realize a temporary benefit from the work force patronizing local establishments.

3.1.2 Community Facilities and Services

No changes in impacts to community facilities and services have occurred since issuance of the EA. US Foods owns the Great Teays Soccer Club fields (East and West) located on either side of the US Foods distribution center. These fields are used and maintained by the Great Teays Soccer Club, a local, recreational, non-profit, youth organization. The Selected Alternative includes acquisition of a portion (42,000 square feet) of the US Foods property currently being used by the Great Teays Soccer Club as playing fields, likely resulting in the partial or complete loss of these fields for use by the Great Teays Soccer Club.

3.1.3 Community Cohesion

No changes in impacts to community cohesion have occurred since issuance of the EA. Under the Selected Alternative, the new access to I-64, along with enhancements to local roadways, improves mobility and associated community cohesion. Roadway capacity and intersection levels of service are expected to improve, although there may be some temporary disruption to community cohesion during the construction process.

3.1.4 Utilities

No changes in impacts to utilities have occurred since issuance of the EA. The Selected Alternative would introduce new impervious roadway surface and efforts to address stormwater and roadway runoff will likely be addressed through new inlets, pipes, roadside drainage ditches, and/or outfall structures. Stormwater management ponds or storage facilitates may also be required. The details and locations of these design elements will be determined as the planning and design process continues. Temporary and/or perpetual property easements may be required for these facilities.

3.1.5 Transportation

No changes in impacts to transportation have occurred since issuance of the EA. The Selected Alternative improves roadway capacity and intersection levels of service, thereby reducing traffic congestion and congestion-related accidents for motorists while also enhancing accessibility for the movement of freight and services to and from the Culloden area.

Potential adverse temporary traffic-related effects during construction will be minimized through the implementation of a Transportation Management Plan. To minimize construction stage impacts on roadways, flaggers will be used where appropriate to ensure safe and proper entry/exit from active construction sites. In the event any temporary road closures were needed, such closures are typically future during off-peak traffic hours and utilize approved traffic control plans.

3.1.6 Residential/Business Impacts and Displacements

The EA Preferred Alternative requires right-of-way (ROW) acquisition and/or temporary easements from 29 properties (20 residential including eight mobile home units, five businesses, two agricultural, and two municipal), as shown below in Table 2. Of these impacted properties, the EA Preferred Alternative displaces 11 residential properties/dwellings (eight of which are individual mobile home residential units) and one business (Whites Trailer Park). The other potentially impacted properties include three businesses (US Foods, Adkins Service Center, and an apartment building on US 60),two agricultural properties, and two municipal properties (two Culloden Public Service District properties, no WVDOH properties included). The EA Preferred Alternative also requires new temporary easements from four residential properties and one business.

Changes in impacts to residences/business and displacements with the Selected Alternative are shown below in Table 3. Overall, the Selected Alternative requires ROW acquisition from 26 properties (18 residential including eight mobile home units, four business, two agricultural, and two municipal). Since issuance of the EA, the Selected Alternative design has been refined to reduce the number of residential displacements from 11 to 10 residential properties/dwellings. One residential displacement along Benedict Road and one residential displacement along US 60 at the connector road intersection are no longer displacements, but a new residential displacement is required due to design changes along the connector road. The Selected Alternative also requires new temporary easements from two residential properties, three businesses, and one agricultural property.

Table 2. Property Impacts of the EA Preferred Alternative and the Selected Alternative

Property Type	Number of Properties Impacted		Total ROW to be Acquired (ft^2)		Properties Affected by Temporary Easements		Total ROW for Temporary Easements (ft^2)	
	EA Preferred Alternative	Selected Alternative	EA Preferred Alternative	Selected Alternative	EA Preferred Alternative	Selected Alternative	EA Preferred Alternative	Selected Alternative
Residential	20*	18*	138,300	188,200	4	2	13,500	3,950
Business	5	4	120,200	129,500	1	3	9,600	16,600
Agricultural/ Municipal	4**	No change	97,000**	132,400**	0	1	0	600

ft^2 = square feet
* Includes both residential properties and induvial residential units (i.e., mobile homes).
** Properties and ROW owned by WVDOH is not included in this number.

Table 3. Property Displacements of the EA Preferred Alternative and the Selected Alternative

Property Type	Property Displacements	
	EA Preferred Alternative	Selected Alternative
Residential*	11*	10*
Business	1	No change
Agricultural/ Municipal	0	No change

* Includes both residential properties and individual residential units (i.e., mobile homes).

Some business activities may be disrupted by construction activities, including but not limited to access modifications, changes to parking and internal circulation, and temporary traffic diversions and road closures. Project officials will work with business owners to minimize and mitigate these disruptions.

As the project development process continues up to and through construction, efforts will be made to minimize and avoid property impacts. WVDOH will contact property owners who may be subject to displacement, a new easement, or ROW acquisition to review and discuss the property acquisition and transfer process. Property owners will be made aware of their rights as part of this process in accordance with local, state, and federal regulations. All properties to be acquired, or used temporarily, will be purchased or utilized in accordance with the *Uniform Relocation and Real Property Acquisition Policies Act*, Title VI of the *Civil Rights Act*, and applicable West Virginia laws.

3.2 Environmental Justice

No changes in impacts to Environmental Justice (EJ) have occurred since issuance of the EA. The Selected Alternative benefits all populations in the area, including minority and low-income populations, by reducing traffic congestion on existing I-64 interchange ramps and surrounding local roads and providing additional access for round-trip daily traffic and freight truck movements from Hurricane to Huntington. No minority or low-income populations or Limited English Proficiency (LEP) households have been identified that would be adversely impacted by the Selected Alternative; therefore, the Selected Alternative does not have a disproportionately high or adverse effect on EJ populations or LEP households and no mitigation is warranted.

In comments provided as part of the EA review process, the U.S. Environmental Protection Agency (EPA) suggested the approach to determining the 10-percentage point benchmark definition as “meaningfully greater” be calculated as a 10 percent multiplier of the EJ study area demographic data and then compared to the overall county data (where “population A” x 1.1 = threshold for comparison for “meaningfully greater”). For example, rather than looking for an instance where there is a clear 10-percentage point difference (i.e., 12.9 percent vs. 2.9 percent) EPA suggested a 1.1 multiplier be used to establish a differential between values for comparison purposes.

WVDOH applied the calculation suggested by EPA and compared the data for the combined Cabell and Putnam Counties population data (Table 4) against the EJ study area, which is itself comprised of both Cabell County and Putnam County geographic and demographic data.

Table 4. Summary of EJ Populations

Parameter	EJ Study Area	Cabell County	Putnam County	Combined County Totals
Total population	1,011	3,167	5,294	8,461
Total minority population*	29	23	187	210
Percentage minority population	2.9%	0.7%	3.5%	2.5%
Persons living below poverty level	377	1,091	1,803	2,894
Percentage of persons living below poverty level	37.3%	34.4%	34.1%	34.2%

* Includes Black Not of Hispanic Origin, Hispanic, American Indian or Alaskan Native, Asian or Pacific Islander, Other Race, and Two or More Races. Source: USCB 2012-2016 ACS Five-Year Estimates

Below is a summary of the calculation results as suggested by EPA comparing the combined county totals to the EJ study area:

- The percentage of persons living below the poverty level (34.2 percent x 1.1 = 37.6 percent) is higher for the county totals than for the EJ the study area value of 37.3 percent.
- The percentage of minority populations (2.5 percent x 1.1 = 2.8 percent) is lower for the combined county totals than for the EJ study area value of 2.9 percent.

The minority population comparison is the only instance where the county demographic population percentage is lower than that of the calculated EJ study area, which suggests a potential EJ population presence. However, in this specific scenario where there are such small population numbers, EPA's approach appears to be inconsistent with the intent of defining a "meaningfully greater" differentiation beyond the existing condition, since a 0.1 percent or 0.001 increase equates to essentially less than one minority individual when applied to the total minority population within the EJ study area.

Given these findings, WVDOH has determined a differentiation of 0.1 percent in minority population (or less than one minority individual) does not meet the intent of the CEQ definition of "meaningfully greater," and therefore no viable EJ populations are present in the study area. Accordingly, the Selected Alternative does not have a disproportionately high or adverse effect on EJ populations or LEP households, and no mitigation is warranted.

3.3 Natural Resources

3.3.1 Land Use and Land Cover

Impacts to land use and land cover from the project are primarily associated with construction of the interchange ramps. Impacts to land use are the same for the EA Preferred Alternative and the Selected Alternative, except for impacts to barren/developed land (Table 5). Due to design refinements, the Selected Alternative will impact slightly more barren land to accommodate stormwater management facilities required for the project and incorporated into the design after issuance of the EA.

Table 5. Land Use and Land Cover Impacts

Land Use/Land Cover Type	EA Preferred Alternative	Selected Alternative
Forest	12.19 acres	No change
Grasslands/Pastureland/Agricultural Land	10.61 acres	No change
Barren/Developed	3.58 acres	**4.28 acres**

Mitigation for impacts to land cover will include the placement of temporary fencing around sensitive areas to protect these areas during construction. An approved Erosion and Sedimentation Control Plan will be implemented to minimize impacts to the water quality and habitat of the study area streams. All disturbed areas will be revegetated (using a native seed mixture) and landscaped upon completion of construction.

3.3.2 Rare, Threatened, and Endangered Species

No changes in impacts to rare, threatened, and endangered species have occurred since issuance of the EA. The EA incorrectly identified three federally listed bat species (Indiana bat, northern long-eared bat, and gray bat) that may occur in proximity to the study area; however, the gray bat is not known to occur in Cabell County. The Selected Alternative would clear 12.19 acres of forest and replace the bridges on I-64 over Benedict Road, potentially impacting habitat for listed bat species. On August 19, 2019, a qualified bat biologist conducted a survey of the I-64 bridges over Benedict Road and found no evidence that bats may be using the bridges. In a letter dated August 20, 2019 WVDOH submitted the results of a bat survey to the U.S. Fish and Wildlife Service (USFWS) with a determination that the project will have no effect/is not likely to adversely affect Federally-listed species. In a letter dated August 20, 2019, USFWS concurred with WVDOH's determination.

3.3.3 Wetlands and Waters of the U.S.

Impacts to wetlands and Waters of the U.S. (WUS) have decreased since issuance of the EA. A field delineation conducted for the EA in March 2019 identified 2.48 acres of wetlands and 4,537 linear feet of WUS within the study area. Based on that field delineation (which included two areas of potential wetlands to which access was not available at the time and for which impacts were estimated), the EA Preferred Alternative has the potential to impact approximately 0.53 acre of freshwater (palustrine) wetlands and 631 linear feet of streams. A wetland delineation within the previously inaccessible areas was conducted just prior to issuance of the EA in November 2019. Due to design refinements, potential impacts to wetlands and WUS from the Selected Alternative are lower than those for the EA Preferred Alternative (Table 6). The Selected Alternative potentially impacts approximately 0.27 acre of palustrine wetlands and 525 linear feet of streams.

Table 6. Potential Impacts to Wetlands and WUS

Wetland/WUS Type	EA Preferred Alternative		Selected Alternative	
	Acres	Linear Feet	Acres	Linear Feet
Palustrine forested	0	----	0	----
Potential palustrine forested*	0.36	----	N/A	N/A
Palustrine emergent**	0	----	0.27	----
Potential palustrine emergent***	0.17	----	N/A	N/A
Perennial stream	----	592	----	486
Intermittent stream	----	0	----	0
Ephemeral stream	----	39	----	39

* occupied apparent homeless encampment (access not available at the time of the initial delineation), impacts are approximate

** includes atypical scrub-shrub and emergent wetland

*** horse pasture (access not available at the time of the initial delineation), impacts are approximate

Actual impacts will be calculated after the U.S. Army Corps of Engineers (USACE) and West Virginia Department of Environmental Protection (WVDEP) have issued a preliminary jurisdictional determination and final design plans have been developed. A compensatory

mitigation plan will be developed and submitted with the USACE/WVDEP Clean Water Act Section 404/401 permit application package. Additional avoidance and minimization measures will be identified during final design and development of construction methods.

3.3.4 Streams and Water Quality

Impacts to streams have decreased since issuance of the EA. The EA Preferred Alternative has the potential to impact approximately 631 linear feet of streams while the Selected Alternative has the potential to impact approximately 525 linear feet of streams (see Table 6 above). All impacts will be permanent and limited to culverting existing streams under the interchange ramps, modifications to Benedict Road and the connector road between Virginia Avenue and US 60 where the roadways cross them. An approved Erosion and Sedimentation Control Plan will be implemented to minimize impacts to water quality in study area streams.

The Selected Alternative does not impact any Wild and Scenic Rivers.

3.3.5 Floodplains

No changes in impacts to floodplains have occurred since issuance of the EA. Based on a review of Federal Emergency Management Agency Flood Insurance Rate Maps, the study area is in Zone X (areas of minimal flood hazard) and outside of the mapped 100-year floodplain. Therefore, the Selected Alternative does not impact regulated floodplains and no mitigation is warranted.

3.3.6 Soils and Farmlands

No changes in impacts to soils and farmlands have occurred since issuance of the EA. The Selected Alternative does not significantly or adversely impact soils within the study area beyond the proposed construction footprint.

The Selected Alternative impacts 4.5 acres of soils classified as prime farmlands and 2.1 acres of soils classified as farmlands of statewide importance. In accordance with the Farmland Protection Policy act of 1981 and using Form AD-1006, WVDOH calculated a total site assessment point value of 26 for the Selected Alternative and submitted the form to the Natural Resources Conservation Service (NRCS) on June 19, 2019. NRCS uses the form score to determine whether a project converts prime of other important farmland to non-farmland use to the extent that mitigation is required. In a response dated June 25, 2019 NRCS determined that the project does not convert a significant amount of protected farmland to non-farmland use and therefore is not subject to the Act.

3.3.7 Geology

No changes in impacts to geology have occurred since issuance of the EA. No known areas of karst topography or fault lines within or adjacent to the study area would be impacted by the Selected Alternative. The Selected Alternative does not impact the geology of the study area beyond the immediate construction area.

3.3.8 Groundwater

No changes in impacts to groundwater have occurred since issuance of the EA. The Selected Alternative is not anticipated to impact groundwater in the study area. Best management

practices regarding potential stormwater runoff and erosion would be employed during construction activities to minimize any potential temporary impacts.

3.4 Air Quality

No changes in impacts to air quality have occurred since issuance of the EA. Cabell and Putnam Counties are designated as maintenance areas for two criteria pollutants (ozone and particulate matter 2.5 micrometers or less in diameter) and are in attainment for all other criteria pollutants. As part of a 2015 traffic study of the project, an air quality analysis was performed and estimated a reduction in fuel consumption and an improvement in air quality after the construction of the new interchange.

During construction, the Selected Alternative will cause a short-term increase in dust and emissions from heavy construction equipment. Dust and exhaust particulate emissions from heavy equipment operations will temporarily degrade air quality in the immediate construction zone. Contractors will be responsible for maintaining, repairing, and adjusting all construction equipment to minimize pollutant emissions. Equipment emissions may be reduced by using newer, lower-emitting equipment, retrofitting older equipment engines, and controlling activity.

3.5 Noise

No changes in impacts to noise levels have occurred since issuance of the EA. In May of 2019, a Noise Analysis was prepared for the project. The Selected Alternative will cause increased traffic noise levels because the noise study area contains nine common noise environments (CNEs) with receptors having predicted future noise levels approaching or exceeding the FHWA noise abatement criteria. These CNEs were evaluated for noise abatement. Because the project results in a traffic noise impact, noise barrier walls were considered. The analyzed noise barriers do meet all of the WVDOH feasible and reasonableness criteria requirements. Therefore, no barriers are recommended for the project

3.6 Hazardous Materials

No changes in impacts to hazardous materials have occurred since issuance of the EA. In March of 2019 a Limited Phase I Environmental Site Assessment (ESA) was performed for the project. Because the Selected Alternative could impact properties that have or potentially have identified environmental conditions, a Hazardous Materials Contingency Plan will be developed to include standard construction measures required by federal, state, and local policies for hazardous materials, removal of onsite debris, and confirmation of presence of pipelines on-site. The properties that were unable to be accessed at the time of the Limited Phase I ESA were the mobile homes that will be removed by the project. Because the owners can choose to move their homes, demolition of these mobile homes may not be needed. If the mobile homes are demolished, then a Phase II ESA will be done during the ROW acquisition phase prior to demolition.

3.7 Cultural Resources

No changes in impacts to cultural resources have occurred since issuance of the EA. On December 17, 2018, WVDOH initiated consultation with the West Virginia State Historic Preservation Office (WV SHPO) Division of Culture and History. Letters were also sent to the Cultural Preservation Officer for the Delaware Nation, the Tribal Archaeologist of the Seneca

Nation of Indians, and the Tribal Historic Preservation Officers for the Delaware Nation, Seneca-Cayuga Tribe of Oklahoma, Eastern Shawnee Tribe of Oklahoma, the United Keetoowah Band of Cherokee Indians in Oklahoma, and the Delaware Tribe of Indians.

In a letter dated March 18, 2019, the Delaware Nation Cultural Preservation Department stated that the project does not endanger cultural, or religious sites of interest to the Delaware Nation.

In March of 2019 an Architectural Survey and an Archaeological Survey were conducted for the project and submitted to the WV SHPO for review. In a letter dated May 21, 2019 the WV SHPO concurred that no architectural resources eligible for listing in the National Register of Historic Places (NRHP) will be affected by the project and stated no further consultation is needed. In a letter dated May 30, 2019, the WV SHPO concurred that no archaeological sites within the Area of Potential Effect are eligible for listing in the NRHP and stated no further consultation is needed for the project.

The Selected Alternative will have no impact to architectural or archaeological resources.

3.8 Section 4(f) and 6(f) Resources

No changes in impacts to Section 4(f) and 6(f) resources have occurred since issuance of the EA. No Section 4(f) or 6(f) resources are present within the study area; therefore, the Selected Alternative will have no impact on these resources.

3.9 Temporary Construction Impacts

No changes in impacts from temporary construction have occurred since issuance of the EA. The Selected Alternative will have short-term and localized impacts to and benefits on the study area during the construction period. Short-term impacts associated with construction include inconvenient traffic conditions; disruptions to residents and the traveling public; increases in soil erosion, noise levels, and particulate air pollution; and health and safety-related construction issues. Short-term benefits consist of increased construction employment.

Standard construction noise specifications and best practices will be used to minimize the effects of construction noise. Construction will be performed to comply with all applicable federal, state, and local laws regarding safety, health, and sanitation. All contractors are required to adhere to Occupational Safety and Health Administration guidelines to protect the lives and health of employees, the safety of the public, and the integrity of adjacent properties. Roadway closures will be scheduled to minimize traffic impacts; public communication and coordination with utility companies will be conducted.

3.10 Energy

No changes in impacts related to energy have occurred since issuance of the EA. Under the Selected Alternative, energy use will temporarily increase due to the use of fossil fuels to power construction equipment. This short-term increase is offset by the improved movement of traffic after the project is constructed. It is anticipated that the Selected Alternative will have a positive future impact by decreasing the amount of energy used since traffic congestion and travel times would be reduced.

3.11 Indirect and Cumulative Impacts

No changes in indirect and cumulative effects have occurred since issuance of the EA. The project is consistent with local master planning efforts and recommendations and has been designed to meet the transportation needs of through travelers and residents of Culloden and the surrounding area. While the project will improve traffic operations in the study area, the Selected Alternative is not anticipated to induce development much beyond background growth already occurring in the study area.

The project is expected to contribute to incremental cumulative effects when considered in combination with effects of past, present, and future actions. The project is anticipated to have an overall positive effect on the regional economy by improving mobility and is consistent with local and regional long-range transportation plans. Therefore, cumulative effects from the Selected Alternative are not anticipated to be significant.

3.12 Summary of Impacts and Mitigation for the Selected Alternative

Table 7 summarizes the impacts and mitigation commitments planned during and after construction of the Selected Alternative.

Table 7. Summary of Impacts and Mitigation for the Selected Alternative

Resource/Element	Impacts	Mitigation
Socioeconomics and Human Environment		
Economics and tax base	Potential beneficial impact due to improved accessibility/mobility to/from I-64 and surrounding areas	None needed
Community facilities/services	Potential beneficial impact due to improved emergency response times. Potential adverse impact due to loss of Great Teays Soccer Fields West.	Design phase partnering will be conducted during final design and construction to coordinate project activities and schedules with emergency service providers, local schools, the U.S. Postal Service, and local/state highway maintenance offices.
Community cohesion	Potential beneficial impact due to new access to I-64, improved roadway capacity and intersection level of service, and improvements to local roadways.	None needed
Utilities	Potential relocation of existing utilities or installation of new utilities may cause temporary disruptions to local properties, services, and traffic.	Coordination with all major utility companies prior to and during construction will be initiated to locate and minimize disturbance to utility services.
Transportation	Beneficial impact from anticipated decreases in traffic congestion.	Construction operations will be scheduled to minimize traffic delays. Access to residences and businesses will be maintained during construction although temporary disruptions may occur. Traffic control signage and devices will be in accordance with the FHWA 2009 *Manual of Uniform Traffic Control Devices*. Flag persons and warning devices, such as signs, barricades, channelizing devices, reflection markers, and hazard warning lights, will be provided as necessary for maintenance of traffic and public safety.
Residential/Business displacements	10 residential 1 business	WVDOH will contact property owners who may be subject to displacement, a new easement, or ROW acquisition to review

Resource/Element	Impacts	Mitigation
		and discuss the property acquisition and transfer process. As the project development process continues up to and through construction, efforts will be made to minimize and avoid property impacts; however, some impacts associated with the project may be inevitable. Property owners will be made aware of their rights as part of this process in accordance with local, state, and federal regulations. All properties to be acquired, or used temporarily, will be purchased or utilized in accordance with the *Uniform Relocation and Real Property Acquisition Policies Act*, Title VI of the *Civil Rights Act*, and applicable West Virginia laws. Project officials will work with business owners to minimize and mitigate for disruptions from construction activities, including but not limited to access modifications, changes to parking and internal circulation, and temporary traffic diversions and road closures.
Environmental Justice populations	No impact	None needed
Natural Resources		
Land use and land cover	12.19 acres of forest 10.61 acres of grassland/ pastureland/agricultural land 4.28 acres of barren/developed land	Mitigation for impacts to land cover will include the placement of temporary protective fence around sensitive areas to protect these areas during construction. An approved Erosion and Sedimentation Control Plan will be implemented to minimize impacts to the water quality and habitat of study area streams. All disturbed areas will be revegetated (utilizing a native seed mixture) and landscaped upon completion of construction.
Rare, threatened, and endangered species	The project will have no effect/is not likely to adversely affect Federally-listed species	None needed
Wetlands and WUS	0.27 acres of wetlands 525 linear feet of WUS Unavoidable impacts to wetlands and WUS will occur but will be minimized to the extent feasible.	These impacts are required to be mitigated in accordance with the 2008 *Rule on Compensatory Mitigation for Losses of Aquatic Resources*. The impacted resources and the proposed compensatory mitigation will be evaluated using the West Virginia Stream and Wetland Valuation Metric. A compensatory mitigation plan will be developed and submitted with the USACE Clean Water Act Section 404/401 permit application package. Additional avoidance and minimization measures will be identified during final design and development of construction methods.

Resource/Element	Impacts	Mitigation
Streams	All impacts will be permanent and limited to culverting existing streams under the interchange ramps, modifications to Benedict Road and the connector road between Virginia Avenue and US 60 where the roadways cross them.	An approved Erosion and Sedimentation Control Plan will be implemented to minimize impacts to water quality in study area streams. Appropriate erosion and sedimentation control measures will be and may include, but not be limited to: • Divert stormwater originating off-site away from the construction area; • Conduct channel construction during low-flow months; • Use proper materials for temporary stream crossings and causeways; • Use temporary and permanent seeding and mulching; • Construct temporary sedimentation ponds; and, • Use silt barrier fence and/or hay bales. • Limit the length of time and amount of unprotected soil that can be exposed. Rock construction entrances will also be located at all site entrances that exit onto paved roads.
National/State Scenic Rivers	No impact	None needed
Floodplains	No impact	None needed
Prime farmlands/farmlands of state/local importance	No impact	None needed
Geology and soils	No impact beyond footprint.	None needed
Groundwater	No impact	None needed
Physical Resources		
Air quality	Minor, temporary impacts in dust/emissions from construction equipment.	Contractors would be responsible for maintaining, repairing, and adjusting all construction equipment to minimize pollutant emissions. Equipment emissions may be reduced by using newer, lower-emitting equipment, retrofitting older equipment engines, and controlling activity. The temporary increase in air pollution particulates will be minimized by the performance of the work in compliance with WVDOH specifications, manuals, and guidelines, and the requirements of the Clean Air Act.
Noise	Minor, temporary increases in noise during construction. Nine CNEs contained receptors with predicted future noise levels approaching or exceeding the FHWA noise abatement criteria.	Every effort will be taken to minimize the noise levels, including the mandatory use of construction equipment with operable mufflers. Other abatement measures may also be considered, if appropriate and applicable, including the following: • Traffic management measures; • Alteration of horizontal and vertical alignments; • Acquisition of property to serve as a buffer to preempt development that would be adversely impacted by traffic noise • Noise insulation (institutional buildings only). None of the analyzed noise barriers meet all of the WVDOH feasible and reasonableness criteria requirements.
Hazardous waste sites	Potential impact to nine sites that have or potentially have identified environmental conditions.	The Contractor will develop a Hazardous Materials Contingency Plan (HMCP) to include standard construction measures required by federal, state, and local policies for hazardous materials, removal of onsite debris, and confirmation of presence of pipelines on-site. At a minimum, this plan includes the following:

Resource/Element	Impacts	Mitigation
		• If contaminated soils or other hazardous materials are encountered during any soil moving operation during construction (e.g., trenching, excavation, grading), construction shall be halted and the HMCP implemented. • Instruct workers on recognition and reporting of materials that may be hazardous. • Minimize delays by continuing performance of the work in areas not affected by hazardous materials operations. • Identify and contact subcontractors and licensed personnel qualified to undertake storage, removal, transportation, disposal, and other remedial work required by, and in accordance with, laws and regulations. • Forward to engineer, copies of reports, permits, receipts, and other documentation related to remedial work. • Notify such agencies as are required to be notified by laws and regulations within the time stipulated by such laws and regulations. • File requests for adjustments to contract time and contract price due to the finding of hazardous materials in the work site in accordance with conditions of contract. • Any hazardous waste issues will be addressed in the project's right of way acquisition phase.
Section 4(f) and 6(f) resources	No impact	None needed
Cultural Resources		
Architectural resources	No impact	None needed
Archaeological resources	No impact	None needed
National Historic Landmarks	No impact	None needed
Sites/districts eligible for the National Register of Historic Places (NRHP)	No impact	None needed
Construction, Indirect, and Cumulative Impacts		

Resource/Element	Impacts	Mitigation
Temporary Construction Impacts	Unavoidable short-term impacts (noise, traffic delay, runoff, vibration, dust emissions.)	Construction will be performed to comply with all applicable federal, state, and local laws regarding safety, health, and sanitation. All contractors are required to adhere to Occupational Safety and Health Administration guidelines to protect the lives and health of employees, the safety of the public, and the integrity of adjacent properties. Construction closures will be scheduled to minimize traffic impacts; public communication and coordination with utility companies will be conducted. Standard construction noise specifications and best practices that help minimize the effects of construction noise include: • Provide advance public notice of construction activities that may generate particularly high noise levels. • Ensure noise created by truck movement does not exceed 88 dBA at 50 feet. • Use portable noise meters for noise level spot checks on specific operations. • Construction operations will not be performed within 1,000 feet of an occupied dwelling unit on Sundays, legal holidays, or between the hours of 9:00 PM and 6:00 AM on other days. • Use sound-control devices and muffled exhaust on all equipment. • Pile driving or blasting operations will not be performed within 3,000 feet of an occupied dwelling unit on Sundays, legal holidays, or between the hours of 9:00 PM and 6:00 AM on other days. • Noise from rock crushing or screening operations performed within 3,000 feet of any occupied dwelling will be mitigated by strategic placement of material stockpiles between the operation and the affected dwelling or by other means.
Energy	Energy use will temporarily increase due to the use of fossil fuels to power construction equipment. This short-term increase is offset by the improved movement of traffic after the project is constructed. It is anticipated that the Build Alternatives will have a positive future impact by decreasing the amount of energy used since traffic congestion and travel times would be reduced.	None needed
Indirect and Cumulative Impacts	The project is not proposed to support a new, expanded, or substantial change in current or planned future development or land use. Therefore, cumulative impacts are insignificant.	Avoidance and minimization of the adverse indirect effects related to this secondary development will be accomplished through comprehensive planning. Although strict land use controls are in place in the study area, future developmental controls could include access management, transfer of development rights, growth management regulations, resource management, resource preservation, conservation easements, and the provision of incentives for infill development.

4.0 PUBLIC COMMENT PERIOD

4.1 Distribution of the Approved Environmental Assessment

The Approved EA was issued for public and agency review on November 15, 2019, with comments due by January 9, 2020.

WVDOH has continued to maintain a public project website for disseminating information about the project and announcing meetings. This website is located at: http://go.wv.gov/dotcomment.

A digital version of the EA as well as the public meeting handout have been available for download and contact information for submitting comments was posted on this website.

Bound copies of the EA were delivered to the following agencies and individuals:

Federal Agencies	Tribal Nations	State and Local Agencies
Barbara Okhorn U.S. Environmental Protection Agency Region 3-Environmental Services Division Office of Environmental Programs Mail Code: 3EA30 1650 Arch Street Philadelphia, PA 19103-2029	Tribal Historic Preservation Officer The Delaware Nation P.O. Box 825 Anadoarko, OK 73005-0825	Charlie Armstead WV Department of Environmental Protection Division of Land Restoration Office of Environmental Remediation 601 57th St, Room 1072 Charleston, WV 25304-2345
Michael E. Hatten Chief Regulatory Division U.S. Army Corps of Engineers Huntington District CELRH-RD 502 8th Street Huntington, WV 25701-2070	Tribal Historic Preservation Officer Seneca-Cayuga Tribe of Oklahoma P.O. Box 45322 Grove, OK 74345	Danny Bennett Natural Resource Program Manager West Virginia Division of Natural Resources P.O. Box 67 Elkins, WV 26241
Lisa Humphreys Project Technician Coordinator U.S. Army Corps of Engineers Huntington District CELRH-EC-CE 502 8th Street Huntington, WV 25701-2070	Tribal Archaeologist Seneca Nation of Indians 90 Ohi:yo' Way Salamanca, NY 14779	Susan Pierce Deputy State Historic Preservation Officer Division of Culture and History 1900 Kanawha Blvd East Charleston, WV 25305
John Schmidt, Supervisor U.S. Fish and Wildlife Service West Virginia Field Office 694 Beverly Pike Elkins, WV 26241	Tribal Historic Preservation Officer Eastern Shawnee Tribe of Oklahoma 12705 East 705 Road Wyandotte, OK 74370	Stephen S. McDaniel, Director West Virginia Division of Natural Resources 324 Fourth Ave South Charleston, WV 25303
Norm Bailey Resource Conservationist Natural Resource Conservation Service U.S. Department of Agriculture 1550 Earl Core Road, Suite 200 Morgantown, WV 26505	Cultural Preservation Officer Delaware Nation P.O. Box 825 Aanadarko, OK 73005-0825	Scott Eplin D-2 District Engineer WV Department of Highways P.O. Box 880 801 Madison Ave Huntington, WV 25712

Federal Agencies	Tribal Nations	State and Local Agencies
Ron Wigel Environmental Specialist Natural Resource Conservation Service U.S. Department of Agriculture 1550 Earl Core Road, Suite 200 Morgantown, WV 26505	Tribal Historic Preservation Officer United Keetoowah Band of Cherokee Indians in Oklahoma P.O. Box 1245 Tahlequah, OK 74465	William F. Durham, Director Office of Air Quality West Virginia Department of Environmental Protection 601 57th Street. SE Charleston, WV 25304-2345
Mary Ann Tierny Regional Administrator Federal Emergency Management Agency Region III 615 Chestnut Street Philadelphia, Pa 19106	Delaware Tribe of Indians THPO Midwestern Office 1929 East 6th Street Duluth, MN 55812	Austin Caperton, Cabinet Secretary West Virginia Department of Environmental Protection 601 57th Street, SE Charleston WV, 253041
William C. Wentworth Remedial Project Manager U.S. Environmental Protection Agency Region 3 Mail Code: 3LC20 1650 Arch Street Philadelphia, PA 19103-2029		Scott G. Mandirola, Director Division of Water and Waste Management Permitting and Engineering Branch West Virginia Department of Environmental Protection 601 57th Street, SE Charleston, WV 25304-2345
Senators and Delegates		
Senator Robert Plymale 205 Cliffview Drive Huntington, WV 25704	Senator Michael A. Woelfel 801 8th Street Huntington, WV 25701	Delegate Daniel Linville P.O. Box 475 Milton, WV 25541
Delegate Sean Hornbuckle P.O. Box 591 Huntington, WV 25710	Delegate John Mandt Jr. 2445 5th Avenue Huntington, WV 25703	

4.2 Informational Public Meeting

On December 9, 2019, an informational public meeting was held at the Culloden Elementary School to present the results of the Approved EA (including design changes in the project developed after issuance of the EA), receive comments on the EA, respond to questions, and listen to concerns from the public about the project.

WVDOH advertised the meeting through a local media company (Kindred Communications), in local newspapers (*The Herald Dispatch* and *The Parthenon* of Marshall University), and on local television stations (WCHS, WOWK, and WSAZ). A public notice was mailed to all commenters and all individuals who attended the first public meeting on January 17, 2019 and is included as Appendix B.

Attendees included residents and business owners. Two sets of project boards and two sets of roll plans were available for the 105 meeting attendees to review. Bound copies of the EA were also available at the meeting. Personnel from WVDOH, FHWA, and consultant support staff were available to answer questions and attendees were encouraged to submit comments at the meeting or following the meeting until the close of the comment period on January 9, 2020. Comment forms were attached to the handouts at the meeting and were available online, before the meeting, and during the comment period, on the WVDOH website (http://go.wv.gov/dotcomment).

Attendees were encouraged to submit comments at the meeting or following the meeting until the close of the comment period on January 9, 2020. Comments could be submitted in person at the December 9, 2019 public meeting, via telephone call, through postal mail or email to WVDOH, and on the WVDOH website.

During the meeting the most common interests and concerns expressed by meeting attendees were:

- Overall support for the project and a desire to see it built as soon as possible
- Interest in having traffic signals at the relocated Benedict Road/Virginia Avenue intersection and at the connector road/US 60 intersection
- Concern about residential and business displacements
- Concern about impacts on local businesses
- Concern about viability of the impacted trailer park once the project is implemented
- Interest in and concern about new development which may occur near the new interchange once constructed
- Interest in improving Virginia Avenue within the study area by increasing lane widths for safety
- Concern about sight distance on US 60 at the railroad overpass
- Concern about impact to the Great Teays soccer fields
- Concern about access to relocated Benedict Road from adjacent farm property
- Concern about the safety of the intersection of relocated Benedict Road and Virginia Avenue
- Interest in providing a connection between old Benedict Road and 1st Avenue East to provide access Virginia Avenue without having to enter Relocated Benedict Road

4.3 Comments on the Environmental Assessment

Comments on the EA were received from 28 individuals, business owners, and regulatory agencies. Of these, three were submitted during the public meeting, 18 were submitted online via the WVDOH website, and the remainder were sent via email or postal mail to WVDOH.

A brief summary of the comments received and WVDOH responses is provided below. Appendix C contains the sign-in sheets from the December 9, 2019 public meeting, all agency and public comments received, and WVDOH responses to individual comments.

Support for the project came from 17 of the commenters, 10 commenters did not specify support for or opposition to the project but raised questions or concerns, and one commenter was opposed to the project. The most frequently mentioned points raised by commenters were:

- Project is needed to reduce traffic congestion
- Impacts to air quality and noise from construction
- Construction of roundabout(s) instead of a connector road
- Traffic noise near residences
- Runoff and flooding

APPENDIX A

I-64 Culloden Interchange at Benedict Road
Interchange Justification Report
(included on CD)

APPENDIX B
December 9, 2019 Public Meeting Notice

NOTICE

OF

INFORMATIONAL WORKSHOP PUBLIC MEETING
And Availability of the Approved Environmental Assessment

STATE PROJECT U306-64-31.65 00
FEDERAL PROJECT NHPP-2317(001)D

CULLODEN INTERCHANGE PROJECT
CABELL COUNTY

The West Virginia Division of Highways (WVDOH) will hold an informational public meeting on Monday, December 9, 2019 in the cafeteria at Culloden Elementary School, located at 2100 US Route 60, Culloden, Cabell County, West Virginia on the proposed Culloden Interchange Project. The project proposes to replace the bridges carrying eastbound and westbound I-64 over County Route 60/21 (Benedict Road), adding a diamond interchange at the location of these bridges (Milepost 32), upgrades to Route 60/21 to a three-lane connector road from the new diamond interchange to Virginia Avenue and alternative from Virginia Avenue to US Route 60. This meeting complies with the public involvement requirements of the National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act.

NO FORMAL PRESENTATION WILL BE MADE. The scheduled public meeting is from 4:00 to 7:00 p.m. and the public will be afforded the opportunity to ask questions and give written comments on the project throughout the meeting. A handout with project details will be available at the meeting and on the WVDOH Website.

Those wishing to file written comments may send them to Mr. RJ Scites, P.E., Director, Engineering Division, West Virginia Division of Highways, 1334 Smith Street, Charleston, West Virginia 25301 on or before Thursday, January 9, 2020. Visit the WVDOH Website at http://go.wv.gov/dotcomment for project information and the opportunity to comment on the project.

The West Virginia Department of Transportation will, upon request, provide reasonable accommodations including auxiliary aids and services necessary to afford an individual with a disability an equal opportunity to participate in our services, programs and activities. Please contact us at (304) 558-3931. Persons with hearing or speech impairments can reach all state agencies by calling (800) 982-8772 (voice to TDD) or (800) 982-8771 (TDD to voice), toll free.

APPENDIX C

Sign-in sheets from the December 9, 2019 Public Meeting, all comments received on the EA, and WVDOH responses to comments

Sign-in Sheets

Culloden Interchange Project – U306-64-31.65 00
Culloden Elementary School
Public Meeting Sign-In
December 9, 2019

Name (Please Print)	Organization/Address	Email	Phone Number
Gregory and Denise Dent	40 Western Dr. Hurricane, WV 25526	ddent643@gmail.com	(304) 562-5806
Stacie Shimp	US Foods 2575 Virginia Ave, Hurricane	Stacie.Shimp@usfoods.com	
Howard Hunter	127 East First St. Culloden WV 25510		304-544-3443
Saleem Salameh	KYOVA IPC	Ssalameh@kyovaipc.org	304.523 7434
Lonnie Campbell	2011 Grace St Culloden	Cumbelso-?@Suddenlink.net	304/12-46-20
Brian Meadows	FoodFair Culloden	Culloden@FoodFairmarkets.com	304-767-1875
Jamie Hardin	2247 US. Rt. 60. Culloden	jamie.hardin@hotmail.com	304-633-7292
DAVID FABEY SUSAN L FABEY	16 SUTHERLAND RD. HRGN.	susan K Fabey	304-529-0891

Culloden Interchange Project – U306-64-31.65 00
Culloden Elementary School
Public Meeting Sign-In
December 9, 2019

Name (Please Print)	Organization/Address	Email	Phone Number
Roger Guest	2229 Virginia Ave.	onerolivetexan@gmail.com	903-910-1686
Fred Soward	2689 Benedict Rd		
Sandra Sowards	2439 Benedict Rd.		
Bethaney Wild	KYOVA Interstate PC	Bwild@kyovaipc.org	
Yvonne Hayes	2231 State St. Culloden, WV 25510	—	304-743-5048
Curtis P. Dunn	1024 Culloden 25510		
Kera Taylor	2416 Benedict Rd Culloden WV	kerachick@yahoo.com	304-553-6854
Donny & Frances Johnson	2231 2nd St Culloden, WV 25510	fzjohnson@yahoo.com	

Culloden Interchange Project – U306-64-31.65 00
Culloden Elementary School
Public Meeting Sign-In
December 9, 2019

Name (Please Print)	Organization/Address	Email	Phone Number
BRUCE BANNERMAN	1030 LEE CK RD	BANNERMAN @ SUDDENLINK.NET	304 743 5455
DALLAS KEYSER	US. FOODS	DALLAS. KEYSER @ USFOODS.COM	
JOE COOPER	3 THISTLECAFE DRIVE OAK, WV 25545	—	304 948 7097
TAYLOR STUCK	Herald-Dispatch	tstuck@HDMediallc.com	
BETTY WHITE			
[illegible]	134 MEADOW DR CULLODEN		
Malar "Sallie" Kim Marcum	2446 Benedict Rd Culloden WV 25510	—	304-690-6937
Emmitt Adkins	P.O. BOX 734 Hurricane 25526		304-741-9871

Culloden Interchange Project – U306-64-31.65 00
Culloden Elementary School
Public Meeting Sign-In
December 9, 2019

Name (Please Print)	Organization/Address	Email	Phone Number
John Gray	US Foods		337-205 1251
Sean O'Brien	US Foods - Corp		
William Bartlett	William Bartlett, PA		304 562-52
Joe Gratz	Culloden Resident		304 457-3498
David Clements	27 Regal Oaks Barboursville WV		304 736-8498
Sherman & Pat Burlingame	2060 Church St. Culloden, WV 25510	sburlingame28@hotmail.com	304 634 8006
DAVID MARTIN	1001 JOHN ST Culloden	WV 25510.	304 638 0317
Bonnie Fizer	1988 RT 60	Culloden WVa	

Culloden Interchange Project – U306-64-31.65 00
Culloden Elementary School
Public Meeting Sign-In
December 9, 2019

Name (Please Print)	Organization/Address	Email	Phone Number
FRANCES CHAPMAN	157 Jamestown WAY HURRICANE WV 25526		304 562-0181
Dana + Judy Jett	4004 Ridgeview Lane Hurricane, WV 25526		304 - 415-2009
Sidney & Connie Baldwin	2442½ & 2440 Benedict Rd Culloden WV. 25510		
David Clemens			
Coy Mullins	1003 JANE Drive culloden, W.V. 25510	coywmullins@Gmail.com	
Stacie Isaac	2112 BROOKE St Culloden WV		304/633 6071
JOE McMILLION	206 POPLAR DRIVE HURRICANE. WV 25526	Joe.McMillion@yahoo.com	
CLARENCE WOODWORTH	2253 SIXTH STREET CULLODEN, WV 25510		

Culloden Interchange Project – U306-64-31.65 00
Culloden Elementary School
Public Meeting Sign-In
December 9, 2019

Name (Please Print)	Organization/Address	Email	Phone Number
Troy Bird	72 Tyler RD	TroyBird0178@AOL.com	304 633 0178
Patricia Dawson	3580 Benedict Rd.	pdawson3580@gmail.com	
Malcolm Sowards	244 Underwood rd	Sowards1969@suddenlink.net	
Doug Sowards	Virginia Ave		—
Charles Smith	2520 Benedict RD		—
David Shirkey	2250 6th st Culloden		
Rodney Shirkey	2252 Rear 6th Street	rodneyshirkey@yahoo.com	
Karen Cremeans	1879 James Reine Lyle		304 633-5909

Culloden Interchange Project – U306-64-31.65 00
Culloden Elementary School
Public Meeting Sign-In
December 9, 2019

Name (Please Print)	Organization/Address	Email	Phone Number
Rodney McCallister	P.O. Box 123 Culloden WV		304 962 4639
Mary M. McCallister	P.O. Box 123 Culloden WV	MaryMorene@gmail.com	304-743-9253
Suzanne Powell	2400 Wolfpen Rd Culloden		743-9307
Russell Owen	9 High Point Dr. Culloden		
Barbara Ferguson	25570 Bonduct Culloden		
Frank Dolce	2215 Oak St Culloden	fedsewd@hotmail.com	304 807 6238
1+ Roy Mallow	2260 Park Ave		7430631
Tony Stillwell	72 Spicewood Lane Culloden 25510	tonystillwell2@gmail.a	304 552-3840

Culloden Interchange Project – U306-64-31.65 00
Culloden Elementary School
Public Meeting Sign-In
December 9, 2019

Name (Please Print)	Organization/Address	Email	Phone Number
Sheena Lincoln Nagger	88 US Rt 60 Culloden WV 25510		3045623451
Stephen Hill	PO Box 587 Hun.	hillassociate@gmail.com	
Doug Kayser	2250 Virginia Av Culloden	dkayser@aol.com	
Mark + Leska Foster	116 Stone Street, Culloden, wv	lafoster@mail.kana.k12.wv.us	
Cassell	4 Parkview Dr Culloden	KellyCar7@aol.com	
HENRY PERKINS	PO BOX 242 CULLODEN WV		
Clifton Bledsoe	2009 Grace St. Culloden		
ROBIN W. CHANEY	2051 MAIN ST., CULLODEN	chaney.rw@gmail.com	304-544-5204

Culloden Interchange Project – U306-64-31.65 00
Culloden Elementary School
Public Meeting Sign-In
December 9, 2019

Name (Please Print)	Organization/Address	Email	Phone Number
James Vance	6 Beth St	jim4kids@yahoo.com	304 638 0537
WILLIAM F. CHAMPE	MILTON WV	WCHAMPE1@YAHOO.COM	3
TIFFANY CHAMPE	Milton WV		
Billy Jack Gregg	3600 Benedict Rd, Culloden, WV	bjgregg@frontier.com	304 562-3507
George Stirkey	P.O. Box 251	Culloden W. Va	
Mark Adkins	PO Box 1	Culloden WV	304-143 4968
Cathy Ellison	Meadows Dr.	Culloden	304 743 9832
Eddie Ellison	" "	"	"

Culloden Interchange Project – U306-64-31.65 00
Culloden Elementary School
Public Meeting Sign-In
December 9, 2019

Name (Please Print)	Organization/Address	Email	Phone Number
Ken Hunt	2668 MIDDLE ROAD Culloden		
David Tenney	2931 Middle Rd "		
Dwight Edwards	2756 Midland Trail Culloden		
[illegible]	2260 3RD ST Culloden		
Frank + Frankie Hardin	2225 State Street Culloden.		
Scott Smith	3499 Benedict Rd.		
Ken Burton	1043 Park Ave		
Tony Hansen	2697 Benedict Rd.		

Culloden Interchange Project – U306-64-31.65 00
Culloden Elementary School
Public Meeting Sign-In
December 9, 2019

Name (Please Print)	Organization/Address	Email	Phone Number
Sandy Sorrell	Self		
Marcella & David Kinzelmiggen			
Jeff & Stephanie Smith			
Ellen Bird			
Ale Hawkbarger	1015 Ponderosa Dr. Culloden, 25516		
Karen Tabor	3501 Benedict Rd		
Greg Carroll	" "		
Cristie Bryant	1841 Sunset View Milton, WV 25541		

Culloden Interchange Project – U306-64-31.65 00
Culloden Elementary School
Public Meeting Sign-In
December 9, 2019

Name (Please Print)	Organization/Address	Email	Phone Number
Norman Proudfoot	125 Meadow Pr. Culloden		3047106037
Mitch Collins	151 Meadow Dr Culloden		304 5412770
Tim Forth	Forth Foods Inc	Tim@foodfairmarkets	304 633-2384
Cathy J. Q. Marcum		Chev7255454@aol.com	549-7836

Culloden Interchange Project – U306-64-31.65 00
Culloden Elementary School
Public Meeting Sign-In
December 9, 2019

Name (Please Print)	Organization/Address	Email	Phone Number
Kim Marcum.			

Agency Comments

WEST VIRGINIA
Division of Culture and History

The Culture Center
1900 Kanawha Blvd., E.
Charleston, WV 25305-0300
Randall Reid-Smith, Commissioner
Phone 304.558.0220 • www.wvculture.org
Fax 304.558.2779 • TDD 304.558.3562
EEO/AA Employer

December 2, 2019

Mr. R. J. Scites, PE
Director
Engineering Division
West Virginia Division of Highways
1334 Smith Street
Charleston, West Virginia 25305

Re: Culloden Interchange (GO BOND)
State Project U306-64-31.65 00; Federal Project NHPP-2317(001)D
FR#: 19-1019-Multi-2

Dear Mr. Scites:

We have reviewed the approved Environmental Assessment (EA) that was prepared for the above-referenced project. As required by Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations, 36 CFR § 800: "Protection of Historic Properties," we submit our comments.

Upon review of the EA we find that it accurately summarizes the cultural resources surveys that were conducted within the proposed project's area of potential effect (APE) and the results of those surveys. As we indicated in previous project-related correspondence, the proposed project will have no effect on architectural or archaeological historic properties. We remain in concurrence with that determination. No further consultation is necessary.

We appreciate the opportunity to be of service. *If you have questions regarding our comments or the review process, please contact Lora A. Lamarre-DeMott, Senior Archaeologist, or Benjamin M. Riggle, Structural Historian, or at (304) 558-0240.*

Sincerely,

Susan M. Pierce
Deputy State Historic Preservation Officer

SMP/LLD/BMR

DIVISION OF NATURAL RESOURCES
Wildlife Resources Section
Elkins Operations Center
738 Ward Rd., P. O. Box 67
Elkins, WV 26241
Telephone 304-637-0245
Fax 304-637-0250

Stephen S. McDaniel
Director

Mr. R. J. Scites, Director of Engineering
Division of Highways
1334 Smith Street
Charleston WV 25301

December 3, 2019

Dear Mr. Scites,

The West Virginia Division of Natural Resources (WVDNR) Wildlife Resources Section (WRS) has reviewed the Environmental Assessment (EA) U306-64-31.65 for the proposed new Culloden Interchange on I64 in Cabell and Putnam Counties. In addition to the new interchange, the project will also involve modifying Benedict Road (CR 60/21) and constructing a connector road between Virginia Avenue (CR 60/10) and US 60. The EA reports that the preferred alternative will permanently impact 0.53 acres of wetlands and 631 linear feet (LF) of stream (592 LF perennial stream and 39 LF ephemeral stream).

The EA discusses potential negative impacts to the mainstem of Indian Fork, a perennial stream and unnamed tributaries to Indian Fork that could be impacted by the proposed project. Indian Fork is a tributary to the Mud River, a high quality warmwater stream. However, as the project is over 3 miles from the confluence of the Mud River, WRS has determined that the project is unlikely to impact the warmwater fishery of the Mud River. According to the EA and consultations with the United States Fish and Wildlife Service, the project is unlikely to directly affect mussels or bats.

The EA has adequately addressed potential environmental concerns associated with construction of the Culloden Interchange. If you have questions concerning these comments, please do not hesitate to contact me at the Elkins Operations Center at 304-637-0245 or email at Anne.M.Wakeford@wv.gov.

Regards,

A M. Wakeford

Anne Wakeford
Coordination Unit

west virginia department of environmental protection

Office of Environmental Remediation
601 57th Street SE
Charleston, WV 25304

Austin Caperton, Cabinet Secretary
dep.wv.gov

December 11, 2019

Mr. R.J. Scites, PE
Director, Engineering Division
WV Division of Highways
1334 Smith Street
Charleston, WV 25301

RE: State Project U306-64-31.65 00 Federal Project NHPP-2317(001)D Culloden Interchange Cabell and Putnam Counties

Mr. Scites,

Thank you for the opportunity to review the abovementioned project. I have compared the location of the West Virginia Division of Highways (WVDOH) project to known West Virginia Department of Protection (WVDEP), Office of Environmental Remediation (OER) remediation projects. I found no known OER remediation projects to be within the limits of the WVDOH project. Therefore, I have concluded that the WVDOH project will not interfere with any remediation projects currently underway and OER extends its endorsement for the project.

Sincerely,

Jason S McDougal
Superfund and DOD IR Program Manager
West Virginia Department of Environmental Protection
Office of Environmental Remediation

The Delaware Nation
Historic Preservation Department
31064 State Highway 281
Anadarko, OK 73005
Phone (405)247-2448

December 17, 2019

To Whom It May Concern:

The Delaware Nation Historic Preservation Department received correspondence regarding the following referenced project(s).

Project: State Project U306-64-31.65 00
Federal Project NHPP-2317(001)D
Culloden Interchange
Cabell and Putnam Counties

Our office is committed to protecting tribal heritage, culture and religion with particular concern for archaeological sites potentially containing burials and associated funerary objects.

The Lenape people occupied the area indicated in your letter during prior to European contact until their eventual removal to our present locations. According to our files, the location of the proposed project does not endanger cultural, or religious sites of interest to the Delaware Nation. **Please continue with the project as planned** keeping in mind during construction should an archaeological site or artifacts inadvertently be uncovered, all construction and ground disturbing activities should immediately be halted until the appropriate state agencies, as well as this office, are notified (within 24 hours), and a proper archaeological assessment can be made.

Please note the Delaware Nation, the Delaware Tribe of Indians, and the Stockbridge Munsee Band of Mohican Indians are the only Federally Recognized Delaware/Lenape entities in the United States and consultation must be made only with designated staff of these three tribes. We appreciate your cooperation in contacting the Delaware Nation Cultural Preservation Office to conduct proper Section 106 consultation. Should you have any questions, feel free to contact our offices at 405-247-2448 ext. 1403.

Erin N. Paden

Erin Paden
Director of Historic Preservation
Delaware Nation
31064 State Highway 281
Anadarko, OK 73005
Ph. 405-247-2448 ext. 1403
epaden@delawarenation-nsn.gov

From: Okorn, Barbara <Okorn.Barbara@epa.gov>
Sent: Wednesday, January 8, 2020 3:05 PM
To: Cummings, Traci L <Traci.L.Cummings@wv.gov>
Cc: Balthazar, Austen (FHWA) <austen.balthazar@dot.gov>; Workman, Jason (FHWA) <Jason.Workman@dot.gov>; Rudnick, Barbara <Rudnick.Barbara@epa.gov>
Subject: [External] Culloden Interchange Project Environmental Assessment

Ms. Cummings,

EPA has reviewed the draft Environmental Assessment (EA) for the proposed Culloden Interchange in Cabell County, WV. The EA evaluates replacing the bridges carrying I-64 over County Route 60/21, adding a diamond interchange at the location of these bridges, and upgrading Rt 60/21 to a three-lane connector road. We understand that the study is being done in compliance with the National Environmental Policy Act (NEPA) and CEQ regulations implementing NEPA. Please find below recommendations for the final EA. These comments may also helpful in future NEPA evaluations.

We would be pleased to discuss with you, at your convenience, issues of particular interest, including noise barriers, community cohesion, identification of environmental justice communities, development of a community outreach plan and stormwater management.

Purpose and Need
We suggest additional clarification be provided describing the purpose and need. The EA states that overall existing traffic levels of service are good and that the current project resulted from concerns regarding increased traffic and congestion. It would be helpful to include information regarding traffic concerns to be sure the project alternatives address identified problems.

Alternatives
The EA would benefit from additional discussion regarding the decision to evaluate only one location for the interchange and the modifications to Benedict Road. We suggest the EA include a more detailed discussion of rationale and criteria used to assess alternatives and clarify how the determination of a preferred alternative (Alternative 2) was made.

- It would be helpful if the EA explained further why the No Build Alternative does not meet the purpose and need.
- 2.2 page 4- Please explain why the diamond interchange and build alternatives (designed in the 1960's) were not modified as part of this project for current conditions.
- We suggest the study include description of design standards.
- Please state if other options were considered for Benedict Road. If other options where considered, we suggest a description of options considered and rationale for dismissing.

- Please consider adding a figure (or add labelling) of existing Benedict Road (Figures 2 and 3 show relocation).
- Page 8- Please provide explanation of why the alignment differences for US 60 connecter are not specifically factored into the model.

Affected Environment and Mitigation

Wetlands, Streams and Stormwater Management
Aquatic resources
The draft EA addresses the permanent impacts to wetlands and streams and suggests the compensatory mitigation will be evaluated using the West Virginia Stream and Wetland Valuation Metric. We recommend the study provide more detail on the potential stream impacts due to the project such as description and location of temporary and permanent impacts and quantity and description of stream that will be permanently or temporarily impacted. If available, please include the results of the analyses in the final EA. Also, the draft EA states that additional avoidance and minimization measures will be developed during design and through construction methods. Please feel free to share information on minimization measures with EPA when developed.

The proposed project would permanently increase the amount of impervious surface. The draft EA does not address the increase in run-off from new imperviousness that would flow into existing drainage areas. This has the potential to increase the volume of stormwater run-off to the Lower Guyandotte Creek Watershed. We suggest improvement to existing or new stormwater measures be discussed in the final EA to handle the increased volume of stormwater. Stormwater features should not be placed in waters of the U.S.

The draft EA states there will be 631 linear feet of direct impacts to existing streams and discusses culverting the streams. We recommend stating the size of the culverts, amount of flow they will receive during storm events and the increase in velocities, so an increase in flooding downstream or to the surrounding residents will not occur. Moreover, Indian Fork Stream flows through the project area and is listed on the Section 303(d) List of the Clean Water Act for a biological impairment. We suggest addressing the cause of this impairment to assist in reducing pollutants to mitigate for the permanent impacts to the stream.

It is suggested that the EA consider potential adverse direct, indirect, and cumulative impacts to water quality in the region. Water quality impacts to wetlands, rivers, streams and other surface waters could result from storm water discharges associated with construction, operation, and maintenance of the roadway. Accidental releases of fuel and chemicals into adjacent water bodies could also be a source of water quality pollution. It may be helpful if the study included a framework for collecting and comparing the baseline water quality to the water quality monitored during construction and operations of the proposed project.

Floodplains

The report states that there will be no impact to floodplains. We understand that the FEMA 100-year floodplain maps did not identify floodplains within the proposed project area. We validated this information. However, we believe that floodplains are present with the waters of the US identified in the report and may be susceptible to flooding events (including extreme weather events). Appropriate consideration should be made when constructing in and around waters, and extreme weather events.

Low Impact Development

To reduce the runoff volume and improve water quality, EPA recommends where possible the incorporation of Low Impact Development (LID) design features into the overall project stormwater management.

We suggest LID options be considered for design of other features such as parking, paving, and landscaping. Technical guidance in implementing green infrastructure practices can be found at: https://19january2017snapshot.epa.gov/sites/production/files/2015-09/documents/eisa-438.pdf. For these measures to be effective, they should be incorporated early in the design phase of the project. Other information can be found at: U.S. EPA's Low Impact Development Website: www.epa.gov/nps/lid ; U.S. EPA's Smart Growth website: www.epa.gov/smartgrowth; and the International Stormwater BMP Website: www.bmpdatabase.org. EPA suggest using the Watershed Resources Registry https://watershedresourcesregistry.org/ to assist with selecting an appropriate mitigation site.

Upland Resources

The preferred Action Alternative will have permanent impacts to 12.9 acres of impacts vegetation for Alternative 2. It is recommended that impacts to this vegetation be minimized and if permanent impacts result, we encourage consideration of compensatory mitigation for the loss of resource.

Species of Concern

We suggest consideration of Bald (and Golden) Eagles and their habitat be incorporated into the NEPA analysis. We suggest the EA state if this was considered for this project. In considering if a proposed project has potential to impact bald eagles or their habitat, consider as part of the affected environment whether breeding territories/nests, feeding areas, roosts, or other important bald eagle use areas are located within the analysis area. It would be helpful if the document included any coordination done with the U.S. Fish and Wildlife Service (FWS).

The EA identifies Gray Bats as one of the three endangered bat species in the project area. The FWS letter does not address Gray Bats. If information is available, we suggest it be included with other FWS coordination.

Pollution Prevention and Hazardous Materials

We suggest the EA contain an analysis of any hazardous materials that maybe on-site during project construction, particularly associated with the use of heavy construction equipment. It appears that heavy construction equipment may be used near various water resources. Effort should be made to avoid and or minimize the release of petroleum product or other potential

pollutants associated with construction activities into the waterways and wetlands. An analysis should consider spill and pollution prevention.

- Hazardous waste page 46: It is unclear how WVDOH determined that the ASTM standard significant data gap is not significant. Please explain.
- We suggest the study team identify how hazardous materials/soil be identified during soil moving. This information may be added to the final document or in design planning. Please consider if contaminant is colorless/odorless.

Air Quality

EPA notes that the proposed project is in a maintenance area for Ozone 8-hr, PM 2.5 24-hr and PM 2.5 annual. To minimize and mitigate air quality impacts during the construction phase of the project, please consider implementing the following Best Management Practice (BMPs):

- Utilize appropriate dust suppression methods during on-site construction activities. Available methods include application of water, soil stabilizers, or vegetation; use of enclosures, covers, silt fences, or wheel washers; and suspension of earth-movement activities during high wind conditions;
- Maintain a speed of less than 15 mph with construction equipment on unpaved surfaces as well as utilize fuel with lower sulfur content;
- Employ a construction management plan in order to minimize interference with regular motor vehicle traffic;
- Use electricity from power poles instead of generators whenever possible;
- Repair and service construction equipment according to the regular maintenance schedule recommended for each individual equipment type;
- Use low-VOC architectural materials and supplies equipment; and
- Incorporate energy-efficient supplies whenever feasible.

Childrens Health

Executive Order 13045, Protection of Children from Environmental Health Risks and Safety Risks, requires each federal agency to identify and assess environmental health and safety risks to children. "Environmental health and safety risks" are defined as "risks to health or to safety that are attributable to products or substances that the child is likely to come in contact with or ingest."

To minimize potential impacts to children's health, we encourage you to identify and assess environmental health risks and safety risks that may disproportionately affect children; and shall ensure that its policies, programs, activities, and standards address disproportionate risks to children that result from environmental health risks or safety risks.

Impacts from Mobile Source Air Pollutant Emissions/Children's Health

We suggest considering exposure and impacts to children from mobile source air pollutants from project construction and operations, including increases in traffic predicted as a result of the project. Children are especially vulnerable due to higher relative doses of air pollution,

smaller diameter airways, and more active time spent outdoors and closer to ground-level sources of vehicle exhaust. Please consider identifying children's proximity to project emission sources, including transportation corridors, transportation hubs, ports, and construction sites.

- Consider exposure and impacts to children from construction emissions and mobile source air pollutants, considering children's proximity to the roadway pre and post-construction. We suggest combining these with other area sources such as, industrial facilities and baseline air quality.

- Respiratory Impacts/Asthma: As applicable, please consider data on existing asthma rates and asthma severity among children and the general community living, working, playing, and attending school and daycare near the project site. To the extent feasible, identify potential for increased health risks of the project with respect to asthma rates and severity in children near the project site and discuss associated potential costs.

Noise Impacts

EPA appreciates the thoroughness of the noise study. We noted the EA explained the reasonable and feasible noise abatement criteria, analysis and final determination; however, it is not fully clear why noise barriers were determined to be not feasible and therefore not recommended. We suggest explanation of why noise barriers were dismissed based on "optional" criteria. Please provide further explanation with in the EA.

We appreciate that you propose to use construction noise best practices (BMP) during the construction phase of the project and the BMPs were listed for review.

Major infrastructure noise impacts people's health; this risk is greatest when construction happens: near people's homes; near people's workplaces; near hospitals and other sensitive areas; when noise isn't managed well. Consideration and mitigation of impacts from noise on health and learning, especially near homes, schools, and daycare centers is encouraged.

Utilities

- Please discuss any coordination with CSX (and other utilities) related to potential impacts from the project.
- Please discuss if there are there any drinking water sources in the area. (Page 40 3.3.8)

Community

We suggest WVDOH develop a community outreach and communication plan that provides specifics on how the local public will be keep informed throughout the duration of the project. We suggest the plan include how the public will be updated on anticipated road closures, times of anticipated high noise or vibration and other possible daily routine disruptions. It is important that communication is clear and concise; information should be easily accessible. Please consider best practices to reach any at-risk, low income communities.

We recognize that the EA study concludes that communities will be positively affected by the proposed project. It appears that a community will be fragmented and there are likely other adverse effects. We suggest the analysis include potential adverse impacts and proposed mitigation.

Both alternatives provided appear to adversely impact the community recreation fields either permanently or on an extended, temporary, basis. Please provide detail on how this community recreational resource will be replaced, or the impact will be mitigated while construction of the roadway is underway.

Environmental Justice:
Our review of the EJ analysis indicated areas where improved methods to identify EJ communities, approaches to assess potential impacts, and approaches to outreach are recommended. Please contact us at your convenience to discuss any of the comments below.

1. Consideration should be given to potential impacts of the project activities that may have adverse or potentially adverse effects upon the at-risk population. Impacts related to, but not limited to, construction, truck traffic, displacements, fugitive dusts, noise, traffic disruptions, community cohesion, and other related effects should be given consideration and appropriate mitigations discussed.
2. There is concern related to the potential displacement of residents, and for the potential to disrupt the cohesion of the community through potential actions. The cohesion and sustainability of communities is an important aspect of this assessment. Communities have traditions and other historical basis that help to make each community vital and sustainable. It is important to consider making sure that communities remain vital and possess a path towards a promising future.
3. We recommend changes in methodology to identify EJ (minority and/or low income) communities. The methodology used to establish minority population benchmarks for this assessment is a major concern. Adding 10 percentage points to the minority population percentage is problematic. This method has an inverse impact upon populations that have small minority populations. To be protective of human health and the environment, we suggest using a percentage of the county or local EJ population values.
4. Instead of adding 10 percentage points, we suggest the benchmark be calculated by taking the minority population percentage and then adding 10 percent of the value. That is in simple terms (the population percentage + an additional 10 percent of that percentage) (X+ 110%)
5. CEQ states the following for identifying minority populations associated with direction for EO: **"**Minority populations should be identified where either: (a) the minority population of the affected area exceeds 50 percent or (b) the minority population percentage of the affected area is meaningfully greater than the minority population percentage in the general population or other appropriate unit of geographic analysis. In identifying minority communities, agencies may consider as a community either a group of individuals living in.. geographic proximity to one another, or a geographically

dispersed/transient set of individuals (such as migrant workers or Native American), where either type of group experiences common conditions of environmental exposure or effect. The selection of the appropriate unit of geographic analysis may be a governing body's jurisdiction, a neighborhood, census tract, or other similar unit that is to be chosen so as to not artificially dilute or inflate the affected minority population. A minority population also exists if there is more than one minority group present and the minority percentage, as calculated by aggregating all minority persons, meets one of the above-stated thresholds."

6. We suggest that the document state the percentage of minorities in the study area. Is the study area reflective of the area impacted by the project? Are there others living outside of the study area that will be impacted or benefitted by the project?

It may be useful to use the methodology developed by the Interagnecy Workgroup on EJ (IWG) work group in minority populations. See below:

Below is an excerpt from the IWG Training composed by this reviewer explaining the calculations:

How to Calculate Benchmark Values

1. Determine Appropriate Benchmarks
2. Calculate the Benchmark Value

Determining Appropriate Benchmarks

1) Determine your approach to establishing your benchmark
   - Apply the 50% test (all areas that are more than 50% are areas of EJ concern.)

2) Determine your benchmark value by comparison to the state or county average
   - If the % minority population is > the state or county average, then this would = Area of Potential EJ concern; OR
   - Set a benchmark that exceeds the state or county average by a given percentage (*e.g.,* taking 110% of the state or county average).

Calculate the Benchmark Value

- State A has a minority population % of 5%.
  - The calculation is 5 (minority population percentage) X 1.1 (110%) = 5.5% (the benchmark value)
- State B has a minority population % of 25%.
  - The calculation is 25 (minority population percentage) X 1.1 (110%) = 27.5% (the benchmark value)
- This method works equally well for all values and percentages.
  - For an additional 10% of the minority population average use 1.1 (110%)
  - For an additional 20% of the minority population average use 1.2 (120%)
  - Please note that some choose to use the area percentage of minority population as the benchmark.

Miscellaneous

- Page 12 – What is the comment and response with 'Charleys Creek after completion?"
- Will there be waste material/ soil resulting from this project? How much and how will and where will it be disposed. How many trucks/day hauling it and what routes, etc.

Thank you for the opportunity to offer these comments. Please let me know if you have any questions or want to discuss these comments.

Barbara Okorn
Office of Communities, Tribes, & Environmental Assessment
US EPA, Region III
1650 Arch Street (3RA10)
Philadelphia, PA 19103
215-814-3330

Public Comments

_Title	
FirstName	Brian
LastName	Powell
Organization	
Email	bpowell@bitmapped.net
MailingAddress	21 Pleasant Hill Rd
City	Morgantown
State	WV
ZipCode	26508
Comments	This seems like a worthwhile project given the congestion at the existing Hurricane Creek Road and Milton interchanges. It is important that the interchange connector tie directly in to US 60 rather than requiring traffic to travel via Virginia Avenue, which has a complicated intersection with US 60. Alternative 2 seems a reasonable choice for the preferred alternative since it avoids the construction of a new bridge over the railroad. I do hope DOH will look at cleaning up the US 60/Virginia Avenue intersection as part of this project. Close Virginia Avenue's access to US 60 to simplify the existing multi-leg intersection with US 60 and to avoid having traffic use this as a shortcut to the new interchange.
CommentType	Online

Created at 11/20/2019 4:15 PM by
Last modified at 11/20/2019 4:15 PM by

_Title	
FirstName	Mark
LastName	Thomas
Organization	
Email	MarkCThomas@pm.me
MailingAddress	667 Thompson Rd
City	Culloden
State	WV
ZipCode	25510
Comments	I live in Culloden and I think this would be a wonderful addition. It appears to be a similar solution to Milton, and adding another option for reaching the interstate would be great for those of us commuting to Huntington or Charleston.
CommentType	Online

Created at 11/25/2019 10:46 AM by
Last modified at 11/25/2019 10:46 AM by

_Title	
FirstName	Brandon
LastName	Hanshaw
Organization	
Email	Brandonhanshaw304@yahoo.com
MailingAddress	125 east first st
City	Culloden
State	WV
ZipCode	25510
Comments	What about the home owners currently living on Bendict Rd and East first st? Are we going have to move?
CommentType	Online

Created at 11/28/2019 7:20 AM by
Last modified at 11/28/2019 7:20 AM by

Mr. RJ Scites, P.E.
Director, Engineering Division
West Virginia Division of Highways
1334 Smith Street
Charleston, West Virginia 25301

DATE: **Monday, December 9, 2019**
LOCATION: **Culloden Elementary School**
SUBJECT: **INFORMATIONAL PUBLIC MEETING**
PROJECT: **Culloden Interchange Project**
U306-64-31.65 00
NHPP-2317(001)D
Cabell County

COMMENTS DUE BY: Thursday, January 9, 2020

Please consider the following comments:

I am all for it, the sooner the better.

(Please print the following information)

NAME: Ernest M Collins

ADDRESS: 151 Meadow Dr
Culloden, WV 25510

ORGANIZATION (IF ANY):

How did you hear about the Informational Workshop Public Meeting? Letter, TV

Project Information and Comment Sheets
Can be found online at our WVDOH Website at http://go.wv.gov/dotcomment.
Under Engineering Projects, Open, and then click Culloden Interchange

Mr. RJ Scites, P.E.
Director, Engineering Division
West Virginia Division of Highways
1334 Smith Street
Charleston, West Virginia 25301

DATE: **Monday, December 9, 2019**
LOCATION: **Culloden Elementary School**
SUBJECT: **INFORMATIONAL PUBLIC MEETING**
PROJECT: **Culloden Interchange Project**
U306-64-31.65 00
NHPP-2317(001)D
Cabell County

COMMENTS DUE BY: Thursday, January 9, 2020

Please consider the following comments:

As the owner of Foodfair Supermarkets, we are very pleased with the ~~Route~~ Site Selection for the Rt 60 Access, We will Anticipate a ~~Stag~~ nice Business increase when complete.

(Please print the following information)

NAME: Tim Forth

ADDRESS: 3050 Woodville Drive, Huntington W.V. 25701

ORGANIZATION (IF ANY): Forth Foods Inc.

How did you hear about the Informational Workshop Public Meeting?
Public posting At Foodfair.

Project Information and Comment Sheets
Can be found online at our WVDOH Website at http://go.wv.gov/dotcomment.
Under Engineering Projects, Open, and then click Culloden Interchange

Mr. RJ Scites, P.E.
Director, Engineering Division
West Virginia Division of Highways
1334 Smith Street
Charleston, West Virginia 25301

DATE: **Monday, December 9, 2019**
LOCATION: **Culloden Elementary School**
SUBJECT: **INFORMATIONAL PUBLIC MEETING**
PROJECT: **Culloden Interchange Project**
U306-64-31.65 00
NHPP-2317(001)D
Cabell County

COMMENTS DUE BY: Thursday, January 9, 2020

Please consider the following comments:
This is Basicly the same we Aproved at are Last meeting. Aslight Adjustment But what i am Looking At there is only one on the corner house that will Be efected - Better than wiping out the whole comunity

(Please print the following information)

NAME: Howard Hunter

ADDRESS: 127 East 1st. Street Culloden WV 25510

ORGANIZATION (IF ANY): None

How did you hear about the Informational Workshop Public Meeting? Mail recieved - media

Project Information and Comment Sheets
Can be found online at our WVDOH Website at http://go.wv.gov/dotcomment.
Under Engineering Projects, Open, and then click Culloden Interchange

From: Scites, Raymond J <Raymond.J.Scites@wv.gov>
Sent: Tuesday, December 10, 2019 7:01 AM
To: Hark, Ben L <Ben.L.Hark@wv.gov>; Mullins, Sondra L <Sondra.L.Mullins@wv.gov>
Subject: FW: [External] Culloden Exit from 64
From: Richard Koven <richard.koven@yahoo.com>
Sent: Tuesday, December 10, 2019 2:15 AM
To: Scites, Raymond J <Raymond.J.Scites@wv.gov>
Subject: [External] Culloden Exit from 64

Sir-
Needed very badly. Excellent project

_Title	
FirstName	Jeremy
LastName	Taylor
Organization	
Email	jrtaylor@k12.wv.us
MailingAddress	
City	Hurricane
State	WV
ZipCode	25526
Comments	Great idea to help alleviate traffic from Hurricane
CommentType	Online

Created at 12/10/2019 12:40 PM by
Last modified at 12/10/2019 12:40 PM by

_Title	
FirstName	Jeffery
LastName	Lilly
Organization	
Email	Oneredchicken@suddenlink.net
MailingAddress	
City	Culloden
State	WV
ZipCode	25510
Comments	I am in complete support of an I64 interchange in Culloden.
CommentType	Online

Created at 12/10/2019 4:48 AM by
Last modified at 12/10/2019 4:48 AM by

_Title	
FirstName	Joshua
LastName	Brown
Organization	
Email	joshuaonealbrown@gmail.com
MailingAddress	PO Box 1039, 2211 US Hwy 60 Apt C
City	Culloden
State	WV
ZipCode	25510
Comments	Greetings. My name is Josh Brown and I'm writing regarding the proposed Culloden Interchange Project. Currently, I reside in the apartment building on the south side of Rt. 60, across from the Food Fair grocery store location. From looking at map and the proposed path of the connector road, it appears that the proposed intersection with Rt. 60 will be close to my home. If traveling westbound on Rt. 60, the rise in the bridge over the railroad tracks creates a blind crest that would seem to be a little dangerous with an intersection and traffic signal. I think it's a better idea to expand Virginia Ave and turn it into the connector road. The road could follow it's current path and meet Rt. 60 in a better location. I think a previous proposal called for a roundabout to be built where Virginia Ave and Rt. 60 meet and if still viable, I think that is a idea to be explored. Also, from the map provided it appears that the work on Rt. 60 for the proposed intersection will require you encroach on the parking lot here at the apartment building. We already don't have enough parking spaces at this building, so any reduction in spaces will be detrimental to this property.
CommentType	Online

Created at 12/10/2019 4:03 PM by
Last modified at 12/10/2019 4:03 PM by

_Title	
FirstName	Ric
LastName	Forbes
Organization	
Email	ricforbes76@gmail.com
MailingAddress	3233 Putnam ave
City	Hurricane
State	WV
ZipCode	25526
Comments	I grew up in Culloden and go there almost daily. This exit has been needed for years and I'm glad it's on the table
CommentType	Online

Created at 12/10/2019 5:40 AM by
Last modified at 12/10/2019 5:40 AM by

_Title	
FirstName	Sarah
LastName	Dent
Organization	
Email	
MailingAddress	
City	Hurricane
State	WV
ZipCode	
Comments	Virginia Ave. going to Culloden can be dangerous as it is now with all the semi trucks. Is anything going to be done to make that road safer since there will be increased traffic along with the semi trucks? I travel that direction daily for work and am just concerned that added traffic could increase the likelihood of accidents.
CommentType	Online

Created at 12/10/2019 10:05 PM by
Last modified at 12/10/2019 10:05 PM by

_Title	
FirstName	TImothy
LastName	Allman
Organization	
Email	tim1233@suddenlink.net
MailingAddress	69 Henson Rd
City	Hurricane
State	WV
ZipCode	25526
Comments	Awesome, we need it, business needs it and the safety of all involved deserve it. Full throttle. Major cheerleader here for this project!
CommentType	Online

Created at 12/10/2019 9:28 AM by
Last modified at 12/10/2019 9:28 AM by

_Title	
FirstName	Kara
LastName	Watson
Organization	
Email	karalwatson73@gmail.com
MailingAddress	Route 1 Box 228
City	Milton
State	WV
ZipCode	25541
Comments	I travel to and from Poca everyday for work. I sometimes take I64 but some days I go to St Albans first and go by Route 60 through culloden. I am confused where it takes 45 minutes to an hour to get off Milton ramp and get to Culloden. I didn't even see it get that bad during fair and pumpkin festival and I grew up in Milton. I rhink its a waste. Why not fix the ramps where accidents frequently occur like St Albans / Nitro bridge on 64 or Oakwood road - Virginia Ave - Lee street in Charleston? Milton and Culloden aren't populated enough for the millions it would take to do this project.
CommentType	Online

Created at 12/11/2019 10:45 PM by
Last modified at 12/11/2019 10:45 PM by

_Title	
FirstName	Douglas for (Betty)
LastName	Keyser
Organization	
Email	dkeyser@aol.com
MailingAddress	2250 Virginia AV
City	Culloden
State	WV
ZipCode	25510
Comments	I'm not against progress but this is my questions and concerns. My concern is my Mother Betty who is suffering First Stage Fibrosis Lung Disease. The air quality is bad now and we change air filters once monthly and use two air cleaners. These filters are not cheap and will need to actually purchase something else!! She get less than $1000.00 a month! On oxygen 24/7 and will be impacted! Will need 24 hours notice for any electrical outings do to concentrator?? Now what's kind of intersection? 4 way stop or Signal? Will sidewalk be put in place? Tons of foot traffic. Will you landscape up your mess? This is in front of our Home !
CommentType	Online

Created at 12/11/2019 10:14 AM by
Last modified at 12/11/2019 10:14 AM by

_Title	
FirstName	Viola
LastName	McCallister
Organization	
Email	
MailingAddress	
City	
State	WV
ZipCode	
Comments	I think the Culloden Interchange will be wonderful. It will help take care of a lot of congestion in Hurricane
CommentType	Online

Created at 12/12/2019 1:27 PM by
Last modified at 12/12/2019 1:27 PM by

_Title	
FirstName	Frank (Jamie)
LastName	Hardin
Organization	
Email	jamie.hardin@hotmail.com
MailingAddress	2247 US Rt. 60
City	Culloden
State	WV
ZipCode	25510
Comments	I'm writing with concern of the current proposal for the Culloden Interchange. With the revised plan which was shared on 9 Dec, it shows there will be a major intersection on Rt. 60 beside our house at 2247 Rt. 60. Route 60 is elevated at this location and is level (roughly) with my second story. With this new proposal, every vehicle approaching Rt. 60 at the intersection after dusk, that is turning left onto Rt. 60, will be shining their headlights through my son's bedroom window. With the addition of a traffic signal, there will be a changing red, yellow, green light outside of my son's window. The addition of the traffic light will cause traffic to stop directly in front of our house. This will increase the road noise significantly for us due to vehicles starting and stopping beside our house. I would like to know if any consideration was or has been taken for these concerns.
CommentType	Online

Created at 12/17/2019 1:06 PM by
Last modified at 12/17/2019 1:06 PM by

_Title	
FirstName	Rodney
LastName	Michallas
Organization	
Email	rodmichallas@mosescars.com
MailingAddress	503 Laurel ridge Rd
City	Culloden
State	WV
ZipCode	25510
Comments	As a resident of Holly Brook to the North off Benedict Rd, I support this project. It takes up to 25 minutes to access US 64 on some mornings. I believe it will bring additional development and revenue to this area and continue to make the Huntington- Charleson Corridor one of the best areas to live in the State. The traffic at Culloden Elementary in the mornings will be reduced as a result and provide a much safer enviorment and faster way to drop kids off. I would like to point out a additional pressing need. The current plans stop the expanison of Benedict road just north of 64. I feel Benedict should be widned 1 to 2 additional feet all the way to the entrance of Holly Brook as school buses must drive left of center when using this road, creating a very unsafe situation. I have video indicating the hazard. I have also witnessed the bus dropping off the shoulder on several occasions as well. The bus turns every day at Holly Brook and the current width of Benedict creates a safety hazard for the children on the bus and those that meet it on its route. This would be of little additional expense in the grand scheme of this project and I hope you will consider this expasnion as part of it for the safety of our children and the people who use this road. The equipment and manpower and resources will already be here. Rod Michallas 304-751-0426
CommentType	Online

Created at 12/17/2019 8:45 AM by
Last modified at 12/17/2019 8:45 AM by

_Title	
FirstName	Ken
LastName	Halstead
Organization	Retired Engineer
Email	halstead11@frontier.com
MailingAddress	2527 1st Ave
City	Huntington
State	WV
ZipCode	25703
Comments	Section 3.3.5 of the EA states "...Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRMs) (indicates that?) the study area is in Zone X (areas of minimal flood hazard) and outside of the mapped FEMA 100-year floodplain (FEMA 2005, FEMA 2012)." Then, it appears that an all too quickly, and an all too intuitive conclusion has been decided regarding runoff and flood related impact of the project. While FEMA language is correctly recited, it does not mean that persons and property cannot be adversely impacted by proposed projects in the upstream watershed, even though both are located in a Zone X designation. The EA does not provide any indication that any detailed hydrologic or hydraulic analyses have been performed for pre- and post- project conditions. No hydrologic/hydraulic engineer is listed as having participated in this study on the AECOM team. There is a levee/floodwall project located downstream of the proposed interchange project on the left descending bank of Indian Fork between US Route 60 and Thompson Road. (Barn Drive – Thompson Road Levee) The interior/protected area of the flood protection project includes the locations of Non-Impacted Receptor Nos. R11-05 and R11-03 as shown on FIGURE NO's: 10a and 10b in APPENDIX C of the EA. It is not clear whether the levee/floodwall project was designed and constructed based on properly engineered design analyses and construction methods. Recent flooding along this reach of Indian Fork occurred during the July 2016 and August 2018 rainfall events. Initial flooding of the protected area could occur as a result of head water depths induced by the existing culvert under US Route 60, which would cause US Route 60 to overflow to the east of the culvert toward R11-05, before the levee embankment overtops. It is not clear that there is any flood warning system affiliated with the levee, whereby advance notice can be provided. Subsequently, it is unknown if there is any Emergency Action Plan or evacuation plan. As such, it is recommended that the proposed interchange project include appropriate hydrologic and hydraulic analyses in sufficient detail using HEC-HMS and HEC-RAS, along with mitigating features if needed, to ensure that interchange does not adversely impact Barn Drive – Thompson Road Levee.
CommentType	Online

Created at 12/19/2019 10:25 AM by
Last modified at 12/19/2019 10:25 AM by

_Title	
FirstName	Sidney
LastName	Baldwin
Organization	homeowner
Email	troublegirl@suddenlink.net
MailingAddress	2442 1/2 benedict rd
City	Culloden
State	WV
ZipCode	25510
Comments	this is intersection is needed but hope it is done the right way after reviewing the plans at the meeting this ramp will only be 55 feet from our driveway.... and with the dust and noise from the project we hope that this is took into consideration with right of ways ...so do the interchange just asking that it be done right and not half assed.
CommentType	Online

Created at 12/27/2019 5:07 PM by
Last modified at 12/27/2019 5:07 PM by

Coy & Joan Mullins
1003 Jane Drive
Culloden, WV 25510

Kevin S. Mullins
1031 Jane Drive
Culloden, WV 25510

December 29, 2019

Mr. RJ Scites, P.E.
Director, Engineering Division
West Virginia Division of Highways
1334 Smith Street
Charleston, WV 25301

Re: Culloden, WV Interchange
U306-64-31.65 00
NHPP-2317(001)D
Cabell County

Dear Mr. Scites, P.E;

I am writing this letter in SUPPORT of the NEW planned interchange for Culloden, WV 25510. My wife and I reside at 1003 Jane Drive, Whispering Pines Subdivision in Culloden, WV. We have lived in Culloden since 1978 and have raised our child in this community as well. Our son owns his home also in the Whispering Pines Subdivision of Culloden and is also in support of this movement for new Culloden Interchange. (Mr. Kevin S. Mullins,1031 Jane Drive, Culloden, WV 25510).

A new interchange will help alleviate traffic congestion at both the Hurricane and Milton Interchanges. It will take the large number of U.S. Food trucks that use the Hurricane and Milton interchanges and allow immediate flow to an interstate entrance / exit versus having to work their way through Hurricane or US Rt. 60 from Milton exit to deliver and return their trucks to the warehouses and food storage units located on Virginia Ave. This in turn will improve the road conditions on Virginia Avenue and US Route 60 due to their weight and amount of travel of these trucks. This proposal has a ramp located near U.S. Foods, which their trucks can exit their parking lot directly (first warehouse/office location) onto this new interchange road and be on Interstate 64 within two to three minutes of exiting their parking lot (warehouse location in Hurricane, WV).

Other industries in this area which would also benefit are Service Wire, Direct TV, T-Shirt International, Food Fair truck deliveries, Brand Energy and Infrastructure Services, RCL Burco Incorporation and their extremely large equipment, J & J Excavating, Family Dollar and Dollar General truck deliveries as well as the Natural Gas Line Industries and equipment which has a lot of vehicles servicing this area. Not to mention their intermittent large equipment when "Pipe Line" work or maintenance is done in our area of Cabell, Putnam and Lincoln Counties.

Another benefit would be the availability of vacant land in all four directions of the planned interchange. The economic benefit from the development of this land due to improved access will be significant to the people of this community as well as the State of West Virginia.

The Sheriff of Cabell County made the statement in "*The Herald Dispatch*" would "*be improved safety for the citizens of this community due to less congestion at the Hurricane and Milton Interchanges.*"

This will also help alleviate the massive congestion at the fork of US Rt. 60, Virginia Ave and First Street in Culloden. It is my sincere hope that I will see ground breaking during the 2020-2021 construction season. The people of West Virginia and Culloden WV will benefit from this project. If anyone wishes to talk to myself, my wife or son, please feel free to contact us in any manner.

Thank you for your time in consideration of support for this new Interchange.

Sincerely,

Coy W. Mullins
Joan P. Mullins
Kevin S. Mullins

Coy W. Mullins, BSF
Joan P. Mullins, MA, BA
Whispering Pines Subdivision
Grant District, Cabell County
1003 Jane Drive
Culloden, WV 25510
304-412-2763
coymullins@aol.com

Kevin S. Mullins, BSN, RN
Whispering Pines Subdivision
Grant District, Cabell County
1031 Jane Drive
Culloden, WV 25510
304-412-2763
KevinMullinsRN@gmail.com

_Title	
FirstName	William
LastName	Dawson
Organization	
Email	cpnegrad07@yahoo.com
MailingAddress	3580 Benedict Rd
City	Culloden
State	WV
ZipCode	25510
Comments	I suggest that you look at using 3 roundabouts on this project. One would be at the intersection of Benedict Rd/Virginia Ave. The other would be at the 5-way intersection of Virginia Ave/Rt 60. And the 3rd would be at the new intersection of New Benedict (US 60 Connector) with Rt 60 As traffic comes off I-64, it will increase the congestion on Virginia and onto Rt 60. Roundabouts may be premature for the load now, but they will eventually be very helpful in avoiding left hand turns at these intersections. If you do not put one at Virginia/Rt60 5-point, you should consider radically changing that interchange so that people cannot try to get on Rt60 at that point.
CommentType	Online

Created at 1/7/2020 6:50 PM by
Last modified at 1/7/2020 6:50 PM by

_Title	
FirstName	Billy
LastName	Gregg
Organization	
Email	bjgregg@frontier.com
MailingAddress	3600 Benedict Road
City	Culloden
State	WV
ZipCode	25510
Comments	I generally approve of the proposed project. However, the WVDOH should provide the residents living on the existing portion of Benedict Road between I-64 and Virginia Avenue an additional access route by providing a connection between existing Benedict Road and 1st Street East, which parallels Benedict Road to the west. As currently proposed, the existing portion of Benedict Road between I-64 and Virginia Avenue will be separated by a berm from the new access road to the Benedict Road/I-64 interchange. Residents on existing Benedict Road will no longer have direct access to Virginia Avenue and will only be able to enter or exit the new access road to the Benedict Road/I-64 interchange by two openings in the separating berm located at the northern and southern ends of the berm. During morning and evening "rush hours" it will be difficult for residents of existing Benedict Road to enter or exit through these two berm openings because of the back-up of vehicles at the Virginia Avenue/Benedict Road intersection on the south end, and I-64/Benedict Road intersection at the north end. This will not only affect residents trying to leave existing Benedict Road, but also traffic on the new access road to the Benedict Road/I-64 interchange as residents attempt to enter existing Benedict Road by turning left across heavy morning or evening traffic. These potential problems could be eliminated by providing an additional access point for existing Benedict Road by connecting existing Benedict Road to 1st Street East. This connection would be made between the northern terminus of existing Benedict Road and the northern end of 1st Street East, and could be constructed entirely on existing DOH right of way. Construction of this alternate access point for residents of existing Benedict Road would allow access to Virginia Avenue one block west of the proposed intersection between new Benedict Road and Virginia Avenue, and would eliminate any potential congestion associated with the limited access points currently proposed for existing Benedict Road. I will mail a map showing the location of the proposed connector between existing Benedict Road and 1st Street East to the Engineering Division of the WVDOT. Thank you for consideration of these comments.
CommentType	Online

Created at 1/9/2020 11:14 AM by
Last modified at 1/9/2020 11:14 AM by

Mr. Scites:

On January 9, 2020, I mailed to you the attached comments concerning the proposed Culloden interchange on I-64. However, during printing the date was not included on the letter. The attached version includes the date, and I would ask that this version be included with my previously filed comments.

Sincerely,

Billy Jack Gregg

Culloden I/C

BILLY JACK GREGG

3600 Benedict Road
Culloden, West Virginia 25510

Telephone: 304-562-3507 **bjgregg@frontier.com** **Fax: 304-562-4172**

January 9, 2020

Mr. R. J. Scites, P.E.
Director, Engineering Division
West Virginia Department of Transportation
1334 Smith Street
Charleston, WV 25301

RE: Comments on the Culloden I-64 Interchange Project

Dear Mr. Scites:

The comments below were submitted on-line on January 9. I am submitting a written copy in order to include a map of the proposed connector road between existing Benedict Road and 1st Street East in Culloden.

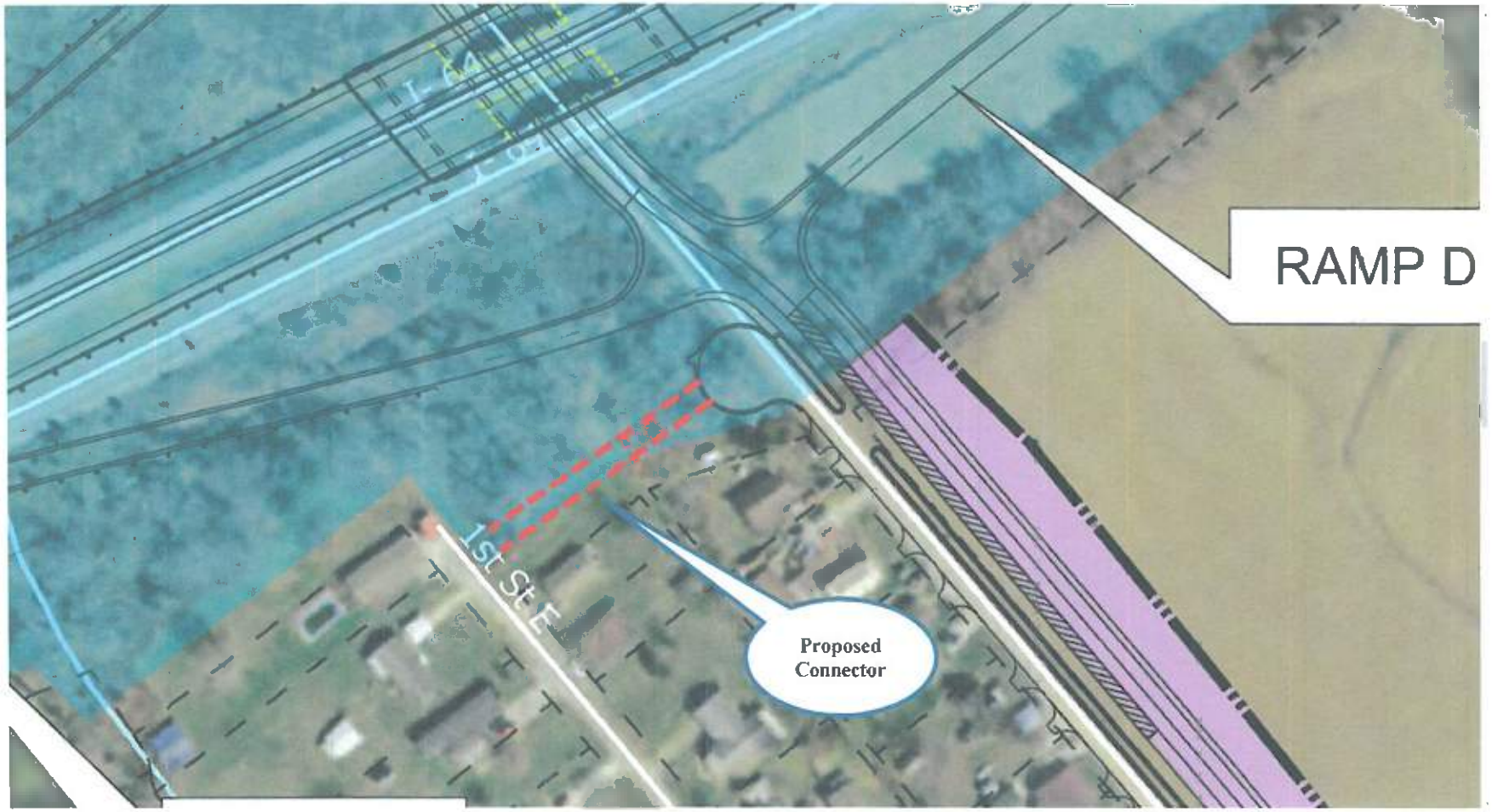
I generally approve of the proposed project. However, the WVDOH should provide the residents living on the existing portion of Benedict Road between I-64 and Virginia Avenue an additional access route by providing a connection between existing Benedict Road and 1st Street East, which parallels Benedict Road to the west.

As currently proposed, the existing portion of Benedict Road between I-64 and Virginia Avenue will be separated by a berm from the new access road to the Benedict Road/I-64 interchange. Residents on existing Benedict Road will no longer have direct access to Virginia Avenue and will only be able to enter or exit the new access road to the Benedict Road/I-64 interchange by two openings in the separating berm located at the northern and southern ends of the berm.

During morning and evening "rush hours" it will be difficult for residents of existing Benedict Road to enter or exit through these two berm openings because of the back-up of vehicles at the Virginia Avenue/Benedict Road intersection on the south end, and I-64/Benedict Road intersection at the north end. This will not only affect residents trying to leave existing Benedict Road, but also traffic on the new access road to the Benedict Road/I-64 interchange as residents attempt to enter existing Benedict Road by turning left across heavy morning or evening traffic.

These potential problems could be eliminated by providing an additional access point for existing Benedict Road by connecting existing Benedict Road to 1st Street East. This connection would be made between the northern terminus of existing Benedict Road and the northern end of 1st Street East, and could be constructed entirely on existing DOH right of way. Construction of this alternate access point for residents of existing Benedict Road would allow access to Virginia Avenue one block west of the proposed intersection between new Benedict Road and Virginia Avenue, and would eliminate any potential congestion associated with the limited access points

MAP SHOWING LOCATION OF NEW ROAD
CONNECTING BENEDICT SERVICE ROAD & FIRST STREET EAST



BILLY JACK GREGG
3600 Benedict Road
Culloden, West Virginia 25510
Telephone: 304-562-3507 **bjgregg@frontier.com** **Fax: 304-562-4172**

Mr. R. J. Scites, P.E.
Director, Engineering Division
West Virginia Department of Transportation
1334 Smith Street
Charleston, WV 25301

RE: Comments on the Culloden I-64 Interchange Project

Dear Mr. Scites:

The comments below were submitted on-line on January 9. I am submitting a written copy in order to include a map of the proposed connector road between existing Benedict Road and 1st Street East in Culloden.

I generally approve of the proposed project. However, the WVDOH should provide the residents living on the existing portion of Benedict Road between I-64 and Virginia Avenue an additional access route by providing a connection between existing Benedict Road and 1st Street East, which parallels Benedict Road to the west.

As currently proposed, the existing portion of Benedict Road between I-64 and Virginia Avenue will be separated by a berm from the new access road to the Benedict Road/I-64 interchange. Residents on existing Benedict Road will no longer have direct access to Virginia Avenue and will only be able to enter or exit the new access road to the Benedict Road/I-64 interchange by two openings in the separating berm located at the northern and southern ends of the berm.

During morning and evening "rush hours" it will be difficult for residents of existing Benedict Road to enter or exit through these two berm openings because of the back-up of vehicles at the Virginia Avenue/Benedict Road intersection on the south end, and I-64/Benedict Road intersection at the north end. This will not only affect residents trying to leave existing Benedict Road, but also traffic on the new access road to the Benedict Road/I-64 interchange as residents attempt to enter existing Benedict Road by turning left across heavy morning or evening traffic.

These potential problems could be eliminated by providing an additional access point for existing Benedict Road by connecting existing Benedict Road to 1st Street East. This connection would be made between the northern terminus of existing Benedict Road and the northern end of 1st Street East, and could be constructed entirely on existing DOH right of way. Construction of this alternate access point for residents of existing Benedict Road would allow access to Virginia Avenue one block west of the proposed intersection between new Benedict Road and Virginia Avenue, and would eliminate any potential congestion associated with the limited access points currently proposed for existing Benedict Road.

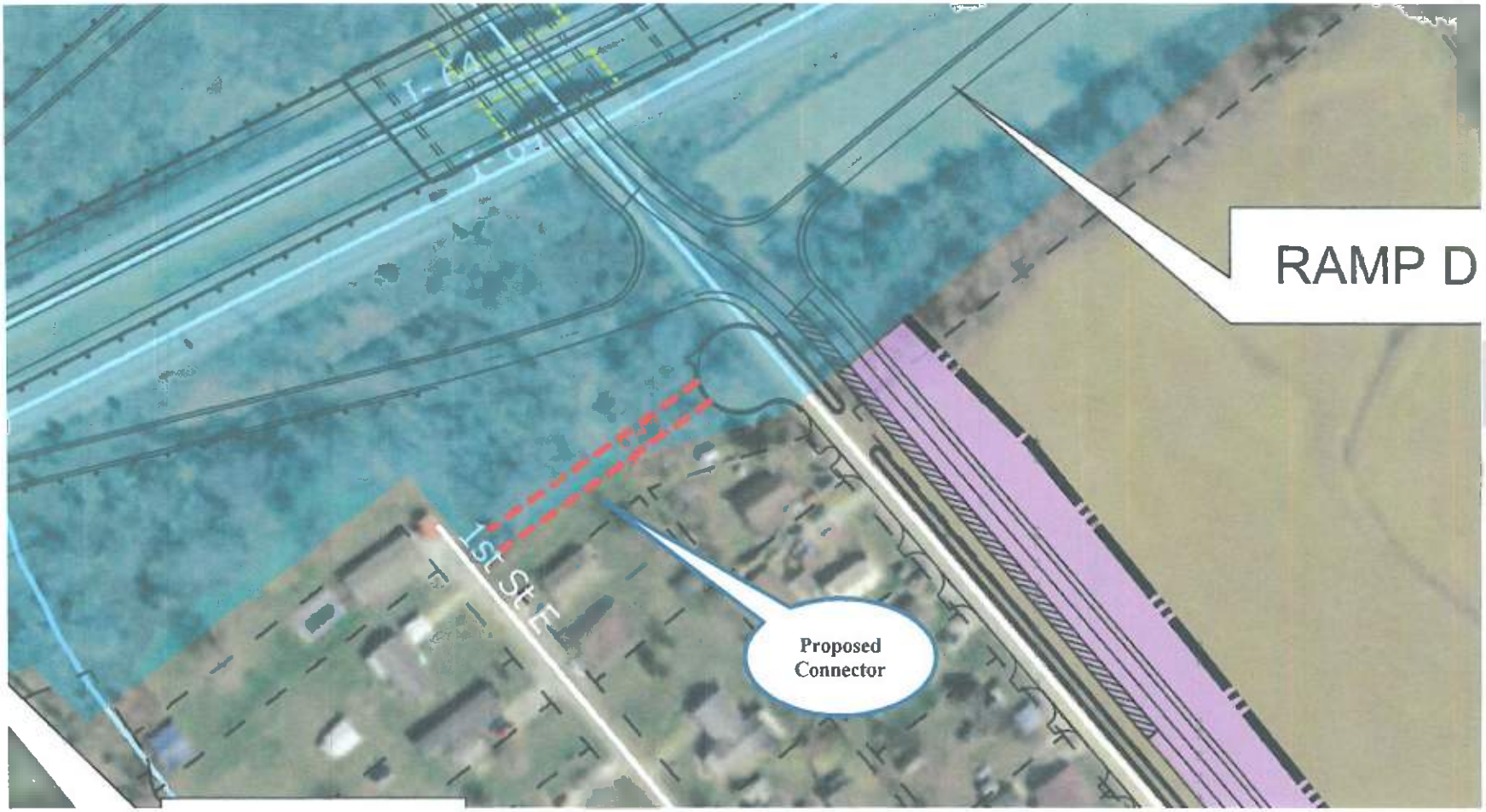
A map showing the location of the proposed connector between existing Benedict Road and 1st Street East in Culloden is attached.

Thank you for consideration of these comments.

Respectfully,

Billy Jack Gregg

MAP SHOWING LOCATION OF NEW ROAD CONNECTING BENEDICT SERVICE ROAD & FIRST STREET EAST



WVDOH Responses to Comments

CULLODEN INTERCHANGE
EA COMMENT SUMMARY

FirstName	LastName	Email	MailingAddress	City	State	Organization	ZipCode	Comments	WVDOH Response
TImothy	Allman	tim1233@suddenlink.net	69 Henson Rd	Hurricane	WV		25526	Awesome, we need it, business needs it and the safety of all involved deserve it. Full throttle. Major cheerleader here for this project!	Thank you for your comment.
Sidney	Baldwin	troublegirl@suddenlink.net	2442 1/2 Benedict Road	Culloden	WV		25510	this is intersection is needed but hope it is done the right way after reviewing the plans at the meeting this ramp will only be 55 feet from our driveway.... and with the dust and noise from the project we hope that this is took into consideration with right of ways ...so do the interchange just asking that it be done right and not half assed.	Thank you for your comments. We understand your concerns. During construction, there will be short-term increases in dust and emissions from heavy construction equipment, which will be minimized by using Best Management Practices (BMPs). Examples of BMPs that would be employed include the following: • Reduction of exposed erodible surface area through appropriate materials and equipment staging procedures; • Cover of exposed surface areas with pavement or vegetation in an expeditious manner; • Reduction of equipment idling times; • Ensure contractor knowledge of appropriate fugitive dust and equipment exhaust controls; • Soil and stockpile stabilization via cover or periodic watering; • Use of low- or zero-emissions equipment; • Use of covered haul trucks and conveyors during materials transportation; • Reduction of electrical generator usage, wherever possible; • Suspension of construction activities during high-wind conditions; • Creation of dust, odor, and nuisance reporting system; • Reduction of vehicle speeds onsite; and • Prohibition of open burning for waste disposal. Standard construction noise specifications and BMPs will be used to minimize the effects of construction noise, including: • Provide advance public notice of construction activities that may generate particularly high noise levels. • Use portable noise meters for noise level spot checks and sound-control devices and muffled exhaust on all equipment. • Do not perform construction operations within 1,000 feet of an occupied dwelling unit on Sundays, legal holidays, or between the hours of 9:00 PM and 6:00 AM on other days.
Joshua	Brown	joshuaonealbrown@gmail.com	PO Box 1039, 2211 US Hwy 60 Apt C	Culloden	WV		25510	Greetings. My name is Josh Brown and I'm writing regarding the proposed Culloden Interchange Project. Currently, I reside in the apartment building on the south side of Rt. 60, across from the Food Fair grocery store location. From looking at map and the proposed path of the connector road, it appears that the proposed intersection with Rt. 60 will be close to my home. If traveling westbound on Rt. 60, the rise in the bridge over the railroad tracks creates a blind crest that would seem to be a little dangerous with an intersection and traffic signal. I think it's a better idea to expand Virginia Ave and turn it into the connector road. The road could follow it's current path and meet Rt. 60 in a better location. I think a previous proposal called for a roundabout to be built where Virginia Ave and Rt. 60 meet and if still viable, I think that is a idea to be explored. Also, from the map provided it appears that the work on Rt. 60 for the proposed intersection will require you encroach on the parking lot here at the apartment building. We already don't have enough parking spaces at this building, so any reduction in spaces will be detrimental to this property.	Thank you for your comments. Early in the preliminary design phase, a roundabout was considered as an additional intersection improvement at the 5-legged intersection that would have worked in conjunction with the diamond interchange. However, introduction of the roundabout results in increased travel delays and an unacceptable Level of Service (LOS). Therefore, the roundabout concept was not studied further and was dismissed from consideration. The intersection sight distance has been measured to be 392 feet for the westbound US 60 traffic from the existing crest curve over the bridge to the proposed intersection, this distance exceeds the requirements for 45 mph design speed. In addition, this intersection will be signalized, and advanced warning signs will be placed along the roadway. There will be a small right of way acquisition from this property, however, the parking lot will not be impacted.
Ernest M.	Collins		151 Meadow Drive	Culloden	WV		25510	I am all for it, the sooner the better.	Thank you for your comment.
William	Dawson	cpnegrad07@yahoo.com	3580 Benedict Road	Culloden	WV		25510	I suggest that you look at using 3 roundabouts on this project. One would be at the intersection of Benedict Rd/Virginia Ave. The other would be at the 5-way intersection of Virginia Ave/Rt 60. And the 3rd would be at the new intersection of New Benedict (US 60 Connector) with Rt 60 As traffic comes off I-64, it will increase the congestion on Virginia and onto Rt 60. Roundabouts may be premature for the load now, but they will eventually be very helpful in avoiding left hand turns at these intersections. If you do not put one at Virginia/Rt60 5-point, you should consider radically changing that interchange so that people cannot try to get on Rt60 at that point.	Thank you for your comments. Early in the preliminary design phase, a roundabout was considered as an additional intersection improvement at the 5-legged intersection that would have worked in conjunction with the diamond interchange. However, introduction of the roundabout results in increased travel delays and an unacceptable Level of Service (LOS). Therefore, the roundabout concept was not studied further and was dismissed from consideration. The traffic analysis for improvements at Virginia Avenue and US 60 does not identify any concerns with the operations of the 5-legged intersection of US 60/Virginia Avenue/1st Street and Walton Road after the interchange is built. Traffic numbers will be significantly reduced at this intersection after the completion of the connector to US 60.
Sarah	Dent			Hurricane	WV			Virginia Ave. going to Culloden can be dangerous as it is now with all the semi trucks. Is anything going to be done to make that road safer since there will be increased traffic along with the semi trucks? I travel that direction daily for work and am just concerned that added traffic could increase the likelihood of accidents.	Thank you for your comments. The project will provide additional access for round-trip daily traffic and freight truck movements from the Hurricane area to Huntington via I-64. Local freight businesses in Culloden mainly use the Hurricane Interchange at I-64 (Exit 34), which then requires travel west to Culloden on Virginia Avenue, then east on US 60 to WV 34 to reach Hurricane. Freight trucks will potentially experience increased connectivity from the project, especially in the area near Benedict Road, due to the project's centralized location to the local freight businesses and Virginia Avenue.
Ric	Forbes	ricforbes76@gmail.com	3233 Putnam Avenue	Hurricane	WV		25526	I grew up in Culloden and go there almost daily. This exit has been needed for years and I'm glad it's on the table	Thank you for your comment.
Tim	Forth		3090 Woodville Drive	Huntington	WV	FoodFair	25701	As the owner of FoodFair Super Marts, we are very pleased with the site selection for the Rt 60 access. We will anticipate a nice business increase when complete.	Thank you for your comment.
Billy Jack	Gregg	bjgregg@frontier.com	3600 Benedict Road	Culloden	WV		25510	I generally approve of the proposed project. However, the WVDOH should provide the residents living on the existing portion of Benedict Road between I-64 and Virginia Avenue an additional access route by providing a connection between existing Benedict Road and 1st Street East, which parallels Benedict Road to the west. As currently proposed, the existing portion of Benedict Road between I-64 and Virginia Avenue will be separated by a berm from the new access road to the Benedict Road/I-64 interchange. Residents on existing Benedict Road will no longer have direct access to Virginia Avenue and will only be able to enter or exit the new access road to the Benedict Road/I-64 interchange by two openings in the separating berm located at the northern and southern ends of the berm. During morning and evening "rush hours" it will be difficult for residents of existing Benedict Road to enter or exit through these two berm openings because of the back-up of vehicles at the Virginia Avenue/Benedict Road intersection on the south end, and I-64/Benedict Road intersection at the north end. This will not only affect residents trying to leave existing Benedict Road, but also traffic on the new access road to the Benedict Road/I-64 interchange as residents attempt to enter existing Benedict Road by turning left across heavy morning or evening traffic. These potential problems could be eliminated by providing an additional access point for existing Benedict Road by connecting existing Benedict Road to 1st Street East. This connection would be made between the northern terminus of existing Benedict Road and the northern end of 1st Street East, and could be constructed entirely on existing DOH right of way. Construction of this alternate access point for residents of existing Benedict Road would allow access to Virginia Avenue one block west of the proposed intersection between new Benedict Road and Virginia Avenue, and would eliminate any potential congestion associated with the limited access points currently proposed for existing Benedict Road. I will mail a map showing the location of the proposed connector between existing Benedict Road and 1st Street East to the Engineering Division of the WVDOT (map attached to letter). Thank you for consideration of these comments.	Thank you for your comments. Since there is currently no access between these two roads, access would need to be provided using private property. WVDOH cannot condem private property to benefit other private property.
Ken	Halstead	halstead11@frontier.com	2527 1st Avenue	Huntington	WV		25703	Section 3.3.5 of the EA states "…Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRMs) (indicates that?) the study area is in Zone X (areas of minimal flood hazard) and outside of the mapped FEMA 100-year floodplain (FEMA 2005, FEMA 2012)." Then, it appears that an all too quickly, and an all too intuitive conclusion has been decided regarding runoff and flood related impact of the project. While FEMA language is correctly recited, it does not mean that persons and property cannot be adversely impacted by proposed projects in the upstream watershed, even though both are located in a Zone X designation. The EA does not provide any indication that any detailed hydrologic or hydraulic analyses have been performed for pre- and post- project conditions. No hydrologic/hydraulic engineer is listed as having participated in this study on the AECOM team. There is a levee/floodwall project located downstream of the proposed interchange project on the left descending bank of Indian Fork between US Route 60 and Thompson Road. (Barn Drive – Thompson Road Levee) The interior/protected area of the flood protection project includes the locations of Non-Impacted Receptor Nos. R11-05 and R11-03 as shown on FIGURE NO's: 10a and 10b in APPENDIX C of the EA. It is not clear whether the levee/floodwall project was designed and constructed based on properly engineered design analyses and construction methods. Recent flooding along this reach of Indian Fork occurred during the July 2016 and August 2018 rainfall events. Initial flooding of the protected area could occur as a result of head water depths induced by the existing culvert under US Route 60, which would cause US Route 60 to overflow to the east of the culvert toward R11-05, before the levee embankment overtops. It is not clear that there is any flood warning system affiliated with the levee, whereby advance notice can be provided. Subsequently, it is unknown if there is any Emergency Action Plan or evacuation plan. As such, it is recommended that the proposed interchange project include appropriate hydrologic and hydraulic analyses in sufficient detail using HEC-HMS and HEC-RAS, along with mitigating features if needed, to ensure that interchange does not adversely impact Barn Drive – Thompson Road Levee.	Thank you for your comments. Pre and Post conditions flow for the project area have been evaluated, post condition flows will not increase beyond existing conditions. This project will incorporate two rentention basins to ensure no impacts.
Brandon	Hanshaw	Brandonhanshaw304@yahoo.com	125 East First Street	Culloden	WV		25510	What about the home owners currently living on Bendict Rd and East first st? Are we going have to move?	Thank you for your comments. Only one residence will be displaced to accommodate the Benedict Road Improvements; this residence is located at the corner of Benedict Road and Virginia Avenue. No residences along East First Street will be displaced.
Frank (Jamie)	Hardin	jamie.hardin@hotmail.com	2247 US Route 60	Culloden	WV		25510	I'm writing with concern of the current proposal for the Culloden Interchange. With the revised plan which was shared on 9 Dec, it shows there will be a major intersection on Rt. 60 beside our house at 2247 Rt. 60. Route 60 is elevated at this location and is level (roughly) with my second story. With this new proposal, every vehicle approaching Rt. 60 at the intersection after dusk, that is turning left onto Rt. 60, will be shining their headlights through my son's bedroom window. With the addition of a traffic signal, there will be a changing red, yellow, green light outside of my son's window. The addition of the traffic light will cause traffic to stop directly in front of our house. This will increase the road noise significantly for us due to vehicles starting and stopping beside our house. I would like to know if any consideration was or has been taken for these concerns.	Thank you for your comments. The new connector would be in a PLUS configuration with State Street and not with the subject house. Based on the noise analysis conducted for the project, no measurable increase in noise would occur at this intersection.
Howard	Hunter		127 East 1st Street	Culloden	WV		25510	This is basically the same we approved at our last meeting. A slight adjustment but what I am looking at there is only one on the corner house that will be affected. Better than wiping out the whole community.	Thank you for your comments.

FirstName	LastName	Email	MailingAddress	City	State	Organization	ZipCode	Comments	WVDOH Response
Douglas for (Betty)	Keyser	dkeyser@aol.com	2250 Virginia Avenue	Culloden	WV		25510	I'm not against progress but this is my questions and concerns. My concern is my Mother Betty who is suffering First Stage Fibrosis Lung Disease. The air quality is bad now and we change air filters once monthly and use two air cleaners. These filters are not cheap and will need to actually purchase something else!! She get less than $1000.00 a month! On oxygen 24/7 and will be impacted! Will need 24 hours notice for any electrical outings do to concentrator?? Now what's kind of intersection? 4 way stop or Signal? Will sidewalk be put in place? Tons of foot traffic. Will you landscape up your mess? This is in front of our Home !	Thank you for your comments. We understand your concerns. During construction, there will be short-term increases in dust and emissions from heavy construction equipment, which will be minimized by using Best Management Practices (BMPs). Examples of BMPs that would be employed include the following: • Reduction of exposed erodible surface area through appropriate materials and equipment staging procedures; • Cover of exposed surface areas with pavement or vegetation in an expeditious manner; • Reduction of equipment idling times; • Ensure contractor knowledge of appropriate fugitive dust and equipment exhaust controls; • Soil and stockpile stabilization via cover or periodic watering; • Use of low- or zero-emissions equipment; • Use of covered haul trucks and conveyors during materials transportation; • Reduction of electrical generator usage, wherever possible; • Suspension of construction activities during high-wind conditions; • Creation of dust, odor, and nuisance reporting system; • Reduction of vehicles speeds onsite; and • Prohibition of open burning for waste disposal. WVDOH will coordinate with local utility companies to provide advance notice of any anticipated outages, including electric. The intersection control (4-way stop or traffic signal) and need for sidewalks will be determined during final design. All areas disturbed by construction will be revegetated (utilizing a native seed mixture) and landscaped upon completion of construction.
Richard	Koven	richard.koven@yahoo.com						Sir - Needed very badly. Excellent project.	Thank you for your comment.
Jeffery	Lilly	Oneredchicken@suddenlink.net		Culloden	WV		25510	I am in complete support of an I64 interchange in Culloden.	Thank you for your comment.
Viola	McCallister				WV			I think the Culloden Interchange will be wonderful. It will help take care of a lot of congestion in Hurricane	Thank you for your comment.
Jason S.	McDougal		601 57th Street SE	Charleston	WV	WVDEP Office of Environmental Remediation	25304	Thank you for the opportunity to review the abovementioned project. I have compared the location of the West Virginia Division of Highways (WVDOH) project to known West Virginia Department of Protection (WVDEP), Office of Environmental Remediation (OER) remediation projects. I found no known OER remediation projects to be within the limits of the WVDOH project. Therefore, I have concluded that the WVDOH project will not interfere with any remediation projects currently underway and OER extends its endorsement for the project.	Thank you for your comments.
Rodney	Michallas	rodmichallas@mosescars.com	503 Laurel Ridge Road	Culloden	WV		25510	As a resident of Holly Brook to the North off Benedict Rd, I support this project. It takes up to 25 minutes to access US 64 on some mornings. I believe it will bring additional development and revenue to this area and continue to make the Huntington- Charleson Corridor one of the best areas to live in the State. The traffic at Culloden Elementary in the mornings will be reduced as a result and provide a much safer enviorment and faster way to drop kids off. I would like to point out a additional pressing need. The current plans stop the expanison of Benedict road just north of 64. I feel Benedict should be widned 1 to 2 additional feet all the way to the entrance of Holly Brook as school buses must drive left of center when using this road, creating a very unsafe situation. I have video indicating the hazard. I have also witnessed the bus dropping off the shoulder on several occasions as well. The bus turns every day at Holly Brook and the current width of Benedict creates a safety hazard for the children on the bus and those that meet it on its route. This would be of little additional expense in the grand scheme of this project and I hope you will consider this expasnion as part of it for the safety of our children and the people who use this road. The equipment and manpower and resources will already be here.	Thank you for your comments. However, the request is outside the scope of this project.
Coy & Joan Kevin	Mullins Mullins	coymullins@aol.com KevinMullinsRN@gmail.com	1003 Jane Drive 1031 Jane Drive	Culloden Culloden	WV WV		25510 25510	I am writing this letter in SUPPORT ofthe NEW planned interchange for Culloden, WV 25510. My wife and I reside at 1003 Jane Drive, Whispering Pines Subdivision in Culloden, WV. We have lived in Culloden since 1978 and have raised our child in this community as well. Our son owns his home also in the Whispering Pines Subdivision of Culloden and is also in support of this movement for new Culloden Interchange. (Mr. Kevin S. Mullins,1031 Jane Drive, Culloden, WV 25510). A new interchange will help alleviate traffic congestion at both the Hurricane and Milton Interchanges. It will take the large number of U.S. Food trucks that use the Hurricane and Milton interchanges and allow immediate flow to an interstate entrance / exit versus having to work their way through Hurricane or US Rt. 60 from Milton exit to deliver and return their trucks to the warehouses and food storage units located on Virginia Ave. This in turn will improve the road conditions on Virginia Avenue and US Route 60 due to their weight and amount of travel of these trucks. This proposal has a ramp located near U.S. Foods, which their trucks can exit their parking lot directly (first warehouse/office location) onto this new interchange road and be on Interstate 64 within two to three minutes ofexiting their parking lot (warehouse location in Hurricane, WV). Other industries in this area which would also benefit are Service Wire, Direct TV, T-Shirt International, Food Fair truck deliveries, Brand Energy and Infrastructure Services, RCL Burco Incorporation and their extremely large equipment, J & J Excavating, Family Dollar and Dollar General truck deliveries as well as the Natural Gas Line Industries and equipment which has a lot of vehicles servicing this area. Not to mention their intermittent large equipment when "Pipe Line" work or maintenance is done in our area of Cabell, Putnam and Lincoln Counties. Another benefit would be the availability of vacant land in all four directions ofthe planned interchange. The economic benefit from the development of this land due to improved access will be significant to the people ofthis community as well as the State of West Virginia. The Sheriff of Cabell County made the statement in "*The Herald Dispatch* " would "*be improved safetyfor the citizens ofthis community due to less congestion at the Hurricane and Milton Interchanges.* " This will also help alleviate the massive congestion at the fork of US Rt. 60, Virginia Ave and First Street in Culloden. It is my sincere hope that I will see ground breaking during the 2020-2021 construction season. The people of West Virginia and Culloden WV will benefit from this project. If anyone wishes to talk to myself, my wife or son, please feel free to contact us in any manner. Thank you for your time in consideration of support for this new interchange.	Thank you for your comments.
Barbara	Okorn	Okorn.Barbara@epa.gov	1650 Arch Street (3RA10)	Philadelphia	PA	Office of Communities, Tribes, & Environmental Assessment US EPA, Region III	19103	**Purpose and Need**. We suggest additional clarification be provided describing the purpose and need. The EA states that overall existing traffic levels of service are good and that the current project resulted from concerns regarding increased traffic and congestion. It would be helpful to include information regarding traffic concerns to be sure the project alternatives address identified problems. **Alternatives**. The EA would benefit from additional discussion regarding the decision to evaluate only one location for the interchange and the modifications to Benedict Road. We suggest the EA include a more detailed discussion of rationale and criteria used to assess alternatives and clarify how the determination of a preferred alternative (Alternative 2) was made. • It would be helpful if the EA explained further why the No Build Alternative does not meet the purpose and need. • 2.2 page 4 - Please explain why the diamond interchange and build alternatives (designed in the 1960's) were not modified as part of this project for current conditions. • We suggest the study include description of design standards. • Please state if other options were considered for Benedict Road. If other options where considered, we suggest a description of options considered and rationale for dismissing. • Please consider adding a figure (or add labelling) of existing Benedict Road (Figures 2 and 3 show relocation). •Page 8 - Please provide explanation of why the alignment differences for US 60 connecter are not specifically factored into the model. **Wetlands, Streams and Stormwater Management, Aquatic resources.** The draft EA addresses the permanent impacts to wetlands and streams and suggests the compensatory mitigation will be evaluated using the West Virginia Stream and Wetland Valuation Metric. We recommend the study provide more detail on the potential stream impacts due to the project such as description and location of temporary and permanent impacts and quantity and description of stream that will be permanently or temporarily impacted. If available, please include the results of the analyses in the final EA. Also, the draft EA states that additional avoidance and minimization measures will be developed during design and through construction methods. Please feel free to share information on minimization measures with EPA when developed. The proposed project would permanently increase the amount of impervious surface. The draft EA does not address the increase in run-off from new imperviousness that would flow into existing drainage areas. This has the potential to increase the volume of stormwater run-off to the Lower Guyandotte Creek Watershed. We suggest improvement to existing or new stormwater measures be discussed in the final EA to handle the increased volume of stormwater. Stormwater features should not be placed in waters of the U.S. The draft EA states there will be 631 linear feet of direct impacts to existing streams and discusses culverting the streams. We recommend stating the size of the culverts, amount of flow they will receive during storm events and the increase in velocities, so an increase in flooding downstream or to the surrounding residents will not occur. Moreover, Indian Fork Stream flows	**Purpose and Need**. Section 2.3 Traffic Analysis in the EA discusses the traffic concerns of the project. A traffic analysis was conducted as part of the I-64 Culloden Interchange at Benedict Road Interchange Justification Report (IJR; HNTB 2019), which was compiled in 2019 to satisfy the operational and safety analysis requirements of the 2017 FHWA Policy on Access to the Interstate System. This report in its entirety will be included as an appendix in the FONSI. **Alternatives**. • See the traffic analysis section of the EA, 2.3. • See Section 2.2 Build Alternatives, the alternative analysis looked at several options and a preferred was chosen. The diamond interchange was designed in the 1960's but was reviewed and found to meet the traffic needs, with minor modifications for the I-64 ramp connection points as affected by the profile grade adjustment, and modifications to Benedict Road. • WVDOH is using current design standards, as required by FHWA. • Since the preferred alternative includes a connection with I-64, the options for this connection are very limited. In addition, the WVDOH wanted to avoid any unnecessary property takes. • Figures 2 and 3 will be updated to show existing Benedict Road with label. • Alternative 1 was not analyzed in Synchro as the software would show very minor differences in operational characteristics compared to Alternative 2 since the volumes are similar. However, the proximity of the proposed Benedict Road tie-in and Thompson Road will hinder both operations and safety at both the intersections along US 60. As Thompson Road is a two-way stop-controlled intersection, westbound vehicles turning left onto Thompson Road may block one of the westbound through lanes thereby impacting the traffic operations at the intersection of Benedict Road. Vehicles making a northbound left turn from Thomson Road may not have room to turn onto US 60 due to the queues from the signal at Benedict Road. Such close vicinity of Thompson Road with a signalized intersection at Benedict Road may result in higher rear-end and angle crashes. **Wetlands, Streams and Stormwater Management, Aquatic resources**. WVDOH will provide appropriate information to obtain the
								through the project area and is listed on the Section 303(d) List of the Clean Water Act for a biological impairment. We suggest addressing the cause of this impairment to assist in reducing pollutants to mitigate for the permanent impacts to the stream. It is suggested that the EA consider potential adverse direct, indirect, and cumulative impacts to water quality in the region. Water quality impacts to wetlands, rivers, streams and other surface waters could result from storm water discharges associated with construction, operation, and maintenance of the roadway. Accidental releases of fuel and chemicals into adjacent water bodies could also be a source of water quality pollution. It may be helpful if the study included a framework for collecting and comparing the baseline water quality to the water quality monitored during construction and operations of the proposed project. **Floodplains.** The report states that there will be no impact to floodplains. We understand that the FEMA 100-year floodplain maps did not identify floodplains within the proposed project area. We validated this information. However, we believe that floodplains are present with the waters of the US identified in the report and may be susceptible to flooding events (including extreme weather events). Appropriate consideration should be made when constructing in and around waters, and extreme weather events. **Low Impact Development**. To reduce the runoff volume and improve water quality, EPA recommends where possible the incorporation of Low Impact Development (LID) design features into the overall project stormwater management. We suggest LID options be considered for design of other features such as parking, paving, and landscaping. **Upland Resources**. The preferred Action Alternative will have permanent impacts to 12.9 acres of impacts vegetation for Alternative 2. It is recommended that impacts to this vegetation be minimized and if permanent impacts result, we encourage consideration of compensatory mitigation for the loss of resource. **Species of Concern**. We suggest consideration of Bald (and Golden) Eagles and their habitat be incorporated into the NEPA analysis. We suggest the EA state if this was considered for this project. In considering if a proposed project has potential to impact bald eagles or their habitat, consider as part of the affected environment whether breeding territories/nests, feeding areas, roosts, or other important bald eagle use areas are located within the analysis area. It would be helpful if the document included any coordination done with the U.S. Fish and Wildlife Service (FWS). The EA identifies Gray Bats as one of the three endangered bat species in the project area. The FWS letter does not address Gray Bats. If information is available, we suggest it be included with other FWS coordination. **Pollution Prevention and Hazardous Materials**. We suggest the EA contain an analysis of any hazardous materials that maybe on-site during project construction, particularly associated with the use of heavy construction equipment. It appears that heavy construction equipment may be used near various water resources. Effort should be made to avoid and or minimize the release of petroleum product or other potential pollutants associated with construction activities into the waterways and wetlands. An analysis should consider spill and pollution prevention.	404 permit. Pre and post condition flows for the project area have been evaluated. Post condition flows will not increase beyond existing conditions. This project will incorporate two retention basins to ensure no impacts. All culverts will be designed according to current WVDOH standards, and both the 401 and 404 permit packages will address the appropriate culvert sizing. All contractors are required to have a Stormwater Pollution Prevention Plan (SWPPP) in place. **Floodplains**. WVDOH completed the FHWA required FEMA research and documentation, and the project will not be affecting any floodplains. **Low Impact Development.** LID will be addressed in final design. **Upland Resources**. Compensatory mitigation for vegetation impacts will be addressed in final design. **Species of Concern**. Coordination with the USFWS was completed for this project, which included review for the Bald and Golden Eagle Protection Act (BGEPA). This correspondence can be found in Appendix A of the EA. The EA incorrectly identified gray bats as an endangered species in the project area. The gray bat is not known from Cabell County, WV. This will be addressed and corrected in the FONSI. **Pollution Prevention and Hazardous Materials**. All contractors are required to have a Stormwater Pollution Prevention Plan (SWPPP) in place. • The properties that were unable to be accessed at the time of the Haz Mat survey were the mobile homes that will be removed by the project. Because the owners can choose to move their homes, demolition of these mobile homes may not be needed. If the mobile homes are demolished, then a Phase II ESA will be done during the ROW acquisition phase prior to demolition. Therefore, WVDOH determined that the data gap is not significant. Any unanswered or hazardous waste issues will be addressed in the project's right of way phase after the FONSI is approved. • Because the Build Alternatives could impact properties that have or potentially have identified environmental conditions, a Hazardous Materials Contingency Plan (HMCP) will be developed by the contractor to include standard construction measures

FirstName	LastName	Email	MailingAddress	City	State	Organization	ZipCode	Comments	WVDOH Response
								• Hazardous waste page 46: It is unclear how WVDOH determined that the ASTM standard significant data gap is not significant. Please explain. • We suggest the study team identify how hazardous materials/soil be identified during soil moving. This information may be added to the final document or in design planning. Please consider if contaminant is colorless/odorless. **Air Quality**. EPA notes that the proposed project is in a maintenance area for Ozone 8-hr, PM 2.5 24-hr and PM 2.5 annual. To minimize and mitigate air quality impacts during the construction phase of the project, please consider implementing the following Best Management Practice (BMPs): • Utilize appropriate dust suppression methods during on-site construction activities. Available methods include application of water, soil stabilizers, or vegetation; use of enclosures, covers, silt fences, or wheel washers; and suspension of earth-movement activities during high wind conditions; • Maintain a speed of less than 15 mph with construction equipment on unpaved surfaces as well as utilize fuel with lower sulfur content; • Employ a construction management plan in order to minimize interference with regular motor vehicle traffic; • Use electricity from power poles instead of generators whenever possible; • Repair and service construction equipment according to the regular maintenance schedule recommended for each individual equipment type; • Use low-VOC architectural materials and supplies equipment; and • Incorporate energy-efficient supplies whenever feasible. Childrens Health **Children's Health**. Executive Order 13045, Protection of Children from Environmental Health Risks and Safety Risks, requires each federal agency to identify and assess environmental health and safety risks to children. "Environmental health and safety risks" are defined as "risks to health or to safety that are attributable to products or substances that the child is likely to come in contact with or ingest." To minimize potential impacts to children's health, we encourage you to identify and assess environmental health risks and safety risks that may disproportionately affect children; and shall ensure that its policies, programs, activities, and standards address disproportionate risks to children that result from environmental health risks or safety risks. Impacts from Mobile Source Air Pollutant Emissions/Children's Health. We suggest considering exposure and impacts to children from mobile source air pollutants from project construction and operations, including increases in traffic predicted as a result of the project. Children are especially vulnerable due to higher relative doses of air pollution, smaller diameter airways, and more active time spent outdoors and closer to ground-level sources of vehicle exhaust. Please consider identifying children's proximity to project emission sources, including transportation	required by federal, state, and local policies for hazardous materials, removal of onsite debris, and confirmation of presence of pipelines on-site. **Air Quality and Children's Health**. As part of a 2015 traffic study of the proposed project, an air quality analysis was performed and estimated a reduction in fuel consumption and an improvement in air quality after the construction of the new interchange. Contractors would be responsible for maintaining, repairing, and adjusting all construction equipment to minimize pollutant emissions. **Impacts from Mobile Source Air Pollutant Emissions/Children's Health**. As part of a 2015 traffic study of the proposed project, an air quality analysis was performed and estimated a reduction in fuel consumption and an improvement in air quality after the construction of the new interchange. Contractors would be responsible for maintaining, repairing, and adjusting all construction equipment to minimize pollutant emissions. **Noise Impacts**. On this project there are 11 Common Noise Environment (CNE) areas. Two CNEs have no impacted receptors, four have estimated costs exceeding the reasonableness criterion, and four have a relatively large number of driveways making any barrier acoustically ineffective. Only CNE 4 was eliminated due to the optional factors. 23CFR772.13(d)(2)(v) provides for the establishment of optional reasonable factors. The last sentence of 13(d)(2)(v) states, "No single optional reasonableness factor can be used to determine reasonableness." The sentence clearly implies that two or more optional reasonableness factors may be used to determine reasonableness. The Division adopted and the FHWA approved/concurred on five optional reasonableness factors. Optional Factor 6 compares the build noise level to the existing noise level. If there is an increase of more than 3dBA, then this factor is deemed reasonable. For this project the highest increase at any receptor, existing to build, is 2dBA with a mean of 1.4dBA. Therefore this factor is deemed not reasonable. Optional Factor 7 compares the build noise level to the future no-build noise level. If there is an increase of more than 2dBA, then this factor is deemed reasonable. For this project the highest increase at any receptor, build to no-build, is 1dBA with a mean of 0.4dBA. Therefore this factor is deemed not reasonable.
								corridors, transportation hubs, ports, and construction sites. • Consider exposure and impacts to children from construction emissions and mobile source air pollutants, considering children's proximity to the roadway pre and post-construction. We suggest combining these with other area sources such as, industrial facilities and baseline air quality. • Respiratory Impacts/Asthma: As applicable, please consider data on existing asthma rates and asthma severity among children and the general community living, working, playing, and attending school and daycare near the project site. To the extent feasible, identify potential for increased health risks of the project with respect to asthma rates and severity in children near the project site and discuss associated potential costs. **Noise Impacts**. EPA appreciates the thoroughness of the noise study. We noted the EA explained the reasonable and feasible noise abatement criteria, analysis and final determination; however, it is not fully clear why noise barriers were determined to be not feasible and therefore not recommended. We suggest explanation of why noise barriers were dismissed based on "optional" criteria. Please provide further explanation with in the EA. We appreciate that you propose to use construction noise best practices (BMP) during the construction phase of the project and the BMPs were listed for review. Major infrastructure noise impacts people's health; this risk is greatest when construction happens: near people's homes; near people's workplaces; near hospitals and other sensitive areas; when noise isn't managed well. Consideration and mitigation of impacts from noise on health and learning, especially near homes, schools, and daycare centers is encouraged. **Utilities**. • Please discuss any coordination with CSX (and other utilities) related to potential impacts from the project. • Please discuss if there are there any drinking water sources in the area. (Page 40 3.3.8) . **Community**.We suggest WVDOH develop a community outreach and communication plan that provides specifics on how the local public will be keep informed throughout the duration of the project. We suggest the plan include how the public will be updated on anticipated road closures, times of anticipated high noise or vibration and other possible daily routine disruptions. It is important that communication is clear and concise; information should be easily accessible. Please consider best practices to reach any at-risk, low income communities. We recognize that the EA study concludes that communities will be positively affected by the proposed project. It appears that a community will be fragmented and there are likely other adverse effects. We suggest the analysis include potential adverse impacts and proposed mitigation.	**Utilities**. • No coordination was required for CSX because the preferred alternative did not impact the railroad. There may potential relocation of existing utilities or installation of new utilities which may cause temporary disruption to local properties, services, and traffic. This will be coordinated with the appropriate utility companies. • The Build Alternatives are not anticipated to impact groundwater in the study area. The water source for Culloden, WV is from a Culloden Water Supply Dam located in Cabell County. This will not be impacted by the project. **Community**. WVDOH followed DD-201 for public involvement, and all NEPA requirements were met. Two public meetings were held in Culloden at the Culloden Elementary School. The first meeting was held on January 17, 2019, and the second was on December 9, 2019. WVDOH followed the FHWA provided Environmental Justice (EJ) Analysis for this project. See Section 3.2 Environmental Justice, page 25. The preferred alternative impacts a privately-owned property. US Foods, the owner, will be compensated as any private landowner would be. **Environmental Justice**. The EJ analysis in the EA was completed following FHWA standards and was approved by FHWA on October 18, 2019. Executive Order (EO) 12898, Federal Actions to Address Environmental Justice in Minority Populations dated February 11, 1994, directs federal agencies to define and address any disproportionately high or adverse human health or environmental effects of their actions on minority and low-income populations to the greatest extent practicable. The U.S. Department of Transportation (USDOT) issued Departmental Order 5610.2(a), Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, which describes steps to prevent disproportionately high and adverse effects to minority or low-income populations from federal transportation projects. In 2016, USDOT issued an EJ strategy to ensure opportunities for minority and low-income communities to influence the transportation planning and decision-making processes through enhanced engagement and meaningful input. EO 13166, Improving Access to Services for Persons with Limited English Proficiency (LEP), identified language barriers as an EJ-related consideration and directs federal agencies to examine their services, identify where needs exist for persons
								Both alternatives provided appear to adversely impact the community recreation fields either permanently or on an extended, temporary, basis. Please provide detail on how this community recreational resource will be replaced, or the impact will be mitigated while construction of the roadway is underway. **Environmental Justice:** Our review of the EJ analysis indicated areas where improved methods to identify EJ communities, approaches to assess potential impacts, and approaches to outreach are recommended. 1. Consideration should be given to potential impacts of the project activities that may have adverse or potentially adverse effects upon the at-risk population. Impacts related to, but not limited to, construction, truck traffic, displacements, fugitive dusts, noise, traffic disruptions, community cohesion, and other related effects should be given consideration and appropriate mitigations discussed. 2. There is concern related to the potential displacement of residents, and for the potential to disrupt the cohesion of the community through potential actions. The cohesion and sustainability of communities is an important aspect of this assessment. Communities have traditions and other historical basis that help to make each community vital and sustainable. It is important to consider making sure that communities remain vital and possess a path towards a promising future. 3. We recommend changes in methodology to identify EJ (minority and/or low income) communities. The methodology used to establish minority population benchmarks for this assessment is a major concern. Adding 10 percentage points to the minority population percentage is problematic. This method has an inverse impact upon populations that have small minority populations. To be protective of human health and the environment, we suggest using a percentage of the county or local EJ population values. 4. Instead of adding 10 percentage points, we suggest the benchmark be calculated by taking the minority population percentage and then adding 10 percent of the value. That is in simple terms (the population percentage + an additional 10 percent of that percentage) (X+ 110%) 5. CEQ states the following for identifying minority populations associated with direction for EO: "Minority populations should be identified where either: (a) the minority population of the affected area exceeds 50 percent or (b) the minority population percentage of the affected area is meaningfully greater than the minority population percentage in the general population or other appropriate unit of geographic analysis. In identifying minority communities, agencies may consider as a community either a group of individuals living in geographic proximity to one another, or a geographically dispersed/transient set of individuals (such as migrant workers or Native American), where either type of group experiences common conditions of environmental exposure or effect. The selection of the appropriate unit of geographic analysis may be a governing body's jurisdiction, a neighborhood, census tract, or other similar unit that is to be chosen so as to not artificially dilute or inflate the affected minority population. A minority population also exists if there is more than one minority group present and the minority percentage, as	with LEP, and implement solutions for meaningful access to those populations. FHWA has adopted the following three guiding principles for the evaluation of environmental justice: • Ensure the full and fair participation by all potentially affected communities in the transportation decision-making process; • Avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority or low-income populations; and • Prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority or low-income populations. This analysis used thresholds for identifying EJ areas based on CEQ's Environmental Justice Guidance under the National Environmental Policy Act (CEQ 1997b). The term "non-EJ area" does not imply the absence of minority or low-income persons living in the study area; rather, a non-EJ area is an area where there is no potential for disproportionate impacts on minority or low-income populations. An EJ area includes any census block group in which the minority or low-income population meets either of the following thresholds: • The minority or low-income population in the census block group exceeds 50 percent; or • The percentage of a minority or low-income population in the affected area is "meaningfully greater" than the percentage of minority or low-income population in the general population. This analysis defined "meaningfully greater" as a census block group in which the percentage of minority or low-income residents was at least 10 percentage points or more than the corresponding percentage in the surrounding jurisdictions (Cabell County or Putnam County, as appropriate) within the study area. For the purposes of this analysis, the study area is defined as the areas spanning the census tracts and block groups within Cabell and Putnam Counties, all within the state of West Virginia. To evaluate the proportionality of impacts and benefits, this analysis identified "EJ areas" and "non-EJ areas" within the study area. In 2010, USCB did not collect income data, so WVDOH used the 2012-2016 ACS Five-Year Estimates (which are based on 2014 census
								calculated by aggregating all minority persons, meets one of the above-stated thresholds." 6. We suggest that the document state the percentage of minorities in the study area. Is the study area reflective of the area impacted by the project? Are there others living outside of the study area that will be impacted or benefitted by the project? It may be useful to use the methodology developed by the Interagency Workgroup on EJ (IWG) work group in minority populations. **Miscellaneous**. • Page 12 – What is the comment and response with 'Charleys Creek after completion?" • Will there be waste material/ soil resulting from this project? How much and how will and where will it be disposed. How many trucks/day hauling it and what routes, etc.	boundaries) to determine the presence of low-income populations, minority populations, and LEP populations. The block group level is the smallest available census data level included in the ACS Five-Year Estimates and is the most current income data level available. A block group is a sub-division of a census tract, and one of the smallest geographic areas for which the USCB tabulates population data. Data reported at the block group level was used to analyze both minority and low-income populations to provide a comparative data set. Census tract data was used to identify potential clusters of LEP households, as LEP data was not available at the block group level. To analyze EJ potential within the study area the minority and low-income populations within the study area were estimated based on the available block group data. To estimate these populations the analysis assumes that the block group populations are equally distributed across the landscape. In its Geographic Areas Reference Manual, USCB notes that the larger census tracts (comprised of aggregated block groups) used to collect the full range of detailed demographic information were first created to be as homogenous as possible (USCB 1994). To generate the EJ study area population estimate, the fractional geographic area of each of the six block groups located within the EJ study area were calculated as a percentage of the overall block group areas. This percentage of each block group was then multiplied by the block group population figure to apportion the population within each block group. Finally, the six calculated block group population values were summed to obtain the overall population within the EJ study area. While the EJ study area has slightly higher percentages of minorities and persons living below the poverty level compared to the study area block groups, they are less than 50 percent of the overall population and are not meaningfully greater (not more than 10 percentage points higher) than the surrounding counties. Therefore, the EJ study area population concentrations for minority or low-income persons are considered non-EJ. Of the 6 block groups in the EJ study area, no block groups contain minority populations of 50 percent or more and no block groups contained low-income populations of 50 percent or more. The analysis also identified no block groups in the EJ study area as

FirstName	LastName	Email	MailingAddress	City	State	Organization	ZipCode	Comments	WVDOH Response
									minority or low-income areas using the "meaningfully greater" threshold criteria for the presence of a minority population or a low-income population. No census tracts that intersect the EJ study area meet the threshold for LEP households greater than 50 percent or meaningfully greater than the percentage of LEP households in the general population. Therefore, the EJ study area is considered to be a non-EJ area. Under the No-Build Alternative, the proposed project would not be constructed and there are no impacts on any populations, including EJ populations and LEP households. Based on the traffic analysis completed for this project, traffic congestion on existing I-64 interchange ramps at the Hurricane Creek Road and John Morris Road interchanges and surrounding local roads (US 60, Virginia Avenue, WV 34, etc.) is not reduced and additional access for round-trip daily traffic is not provided. Both Build Alternatives benefit all populations in the area, including minority and low-income populations by reducing traffic congestion on existing I-64 interchange ramps and surrounding local roads and providing additional access for round-trip daily traffic and freight truck movements from Hurricane to Huntington. No minority or low-income populations or LEP households have been identified that would be adversely impacted by the proposed project. Therefore, the Build Alternatives do not have a disproportionately high or adverse effect on EJ populations or LEP households. EPA suggests the approach to determining the 10-percentage point benchmark definition as "meaningfully greater" be calculated as a 10 percent multiplier of the EJ study area demographic data and then compared to the overall county data (where "population A" x 1.1= threshold for comparison for "meaningfully greater"). For example, rather than looking for an instance where there is a clear 10-percentage point difference (i.e., 12.9 percent vs. 2.9 percent) EPA suggested a 1.1 multiplier be used to establish a differential between values for comparison purposes. WVDOH applied the calculation suggested by EPA and compared the data for the combined Cabell and Putnam Counties population data (see table) against the EJ study area, which is itself comprised of both Cabell County and Putnam County geographic and demographic data.
									<table><tr><th>Parameter</th><th>EJ Study Area</th><th>Cabell County</th><th>Putnam County</th><th>Combined County Totals</th></tr><tr><td>Total population</td><td>1,011</td><td>3,167</td><td>5,294</td><td>8,461</td></tr><tr><td>Total minority population*</td><td>29</td><td>23</td><td>187</td><td>210</td></tr><tr><td>Percentage minority population</td><td>2.9%</td><td>0.7%</td><td>3.5%</td><td>2.5%</td></tr><tr><td>Persons living below poverty level</td><td>377</td><td>1,091</td><td>1,803</td><td>2,894</td></tr><tr><td>Percentage of persons living below poverty level</td><td>37.3%</td><td>34.4%</td><td>34.1%</td><td>34.2%</td></tr></table> * Includes Black Not of Hispanic Origin, Hispanic, American Indian or Alaskan Native, Asian or Pacific Islander, Other Race, and Two or More Races. Source: USCB 2012-2016 ACS Five-Year Estimates Below is a summary of the calculation results comparing the combined county totals to the EJ study area: • The percentage of persons living below the poverty level (34.2 percent x 1.1 = 37.6 percent) is higher for the county totals than for the EJ the study area value of 37.3 percent. • The percentage of minority populations (2.5 percent x 1.1 = 2.8 percent) is lower for the combined county totals than for the EJ study area value of 2.9 percent. The minority population comparison is the only instance where the county demographic population percentage is lower than that of the calculated EJ study area, which suggests a potential EJ population presence. However, in this specific scenario where there are such small population numbers, EPA's approach appears to be inconsistent with the intent of defining a "meaningfully greater" differentiation beyond the existing condition, since a 0.1 percent or 0.001 increase equates to essentially less than one minority individual when applied to the total minority population within the EJ study area. Given these findings, WVDOH has determined a differentiation of 0.1 percent in minority population (or less than one minority individual) does not meet the intent of the CEQ definition of "meaningfully greater," and therefore no viable EJ populations are
									present in the study area, the Selected Alternative does not have a disproportionately high or adverse effect on EJ populations or LEP households, and no mitigation is warranted. **Miscellaneous** • The Culloden Elementary School and Charleys Creek Road are outside the study area for this project. • The waste material/soil disposal is the responsibility of the contractor for this project.
Erin N.	Paden	epaden@delawarenation-nsn.gov	31064 State Highway 281	Anadarko	OK	The Delaware Nation Historic Preservation Department	73005	Our office is committed to protecting tribal heritage, culture and religion with particular concern for archaeological sites potentially containing burials and associated funerary objects. The Lenape people occupied the area indicated in your letter during prior to European contact until their eventual removal to our present locations. According to our files, the location of the proposed project does not endanger cultural, or religious sites of interest to the Delaware Nation. Please continue with the project as planned keeping in mind during construction should an archaeological site or artifacts inadvertently be uncovered, all construction and ground disturbing activities should immediately be halted until the appropriate state agencies, as well as this office, are notified (within 24 hours), and a proper archaeological assessment can be made. Please note the Delaware Nation, the Delaware Tribe of Indians, and the Stockbridge Munsee Band of Mohican Indians are the only Federally Recognized Delaware/Lenape entities in the United States and consultation must be made only with designated staff of these three tribes. We appreciate your cooperation in contacting the Delaware Nation Cultural Preservation Office to conduct proper Section 106 consultation.	Thank you for your comments.
Susan M.	Pierce		1900 Kanawha Boulevard E.	Charleston	WV	West Virginia Division of Culture and History	25305-0300	We have reviewed the approved Environmental Assessment (EA) that was prepared for the above-referenced project. As required by Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations, 36 CFR § 800: "Protection of Historic Properties," we submit our comments. Upon review of the EA we find that it accurately summarizes the cultural resources surveys that were conducted within the proposed project's area of potential effect (APE) and the results of those surveys. As we indicated in previous project-related correspondence, the proposed project will have no effect on architectural or archaeological historic properties. We remain in concurrence with that determination. No further consultation is necessary.	Thank you for your comments.
Brian	Powell	bpowell@bitmapped.net	21 Pleasant Hill Road	Morgantown	WV		26508	This seems like a worthwhile project given the congestion at the existing Hurricane Creek Road and Milton interchanges. It is important that the interchange connector tie directly in to US 60 rather than requiring traffic to travel via Virginia Avenue, which has a complicated intersection with US 60. Alternative 2 seems a reasonable choice for the preferred alternative since it avoids the construction of a new bridge over the railroad. I do hope DOH will look at cleaning up the US 60/Virginia Avenue intersection as part of this project. Close Virginia Avenue's access to US 60 to simplify the existing multi-leg intersection with US 60 and to avoid having traffic use this as a shortcut to the new interchange.	Thank you for your comments. Early in the preliminary design phase, a roundabout was considered as an additional intersection improvement at the 5-legged intersection that would have worked in conjunction with the diamond interchange. However, introduction of the roundabout results in increased travel delays and an unacceptable Level of Service (LOS). Therefore, the roundabout concept was not studied further and was dismissed from consideration. This intersection will have less traffic after the new connector is completed, and therefore would operate more efficiently than the current intersection.
Jeremy	Taylor	jrtaylor@k12.wv.us		Hurricane	WV		25526	Great idea to help alleviate traffic from Hurricane	Thank you for your comment.
Mark	Thomas	MarkCThomas@pm.me	667 Thompson Road	Culloden	WV		25510	I live in Culloden and I think this would be a wonderful addition. It appears to be a similar solution to Milton, and adding another option for reaching the interstate would be great for those of us commuting to Huntington or Charleston.	Thank you for your comment.
Anne	Wakeford	Anne.M.Wakeford@wv.gov	738 Ward Road PO Box 67	Elkins	WV	WVDNR Wildlife Resources Section	26241	The West Virginia Division of Natural Resources (WVDNR) Wildlife Resources Section (WRS) has reviewed the Environmental Assessment (EA) U306-64-31.6 for the proposed new Culloden Interchange on I-64 in Cabell and Putnam Counties. In addition to the new interchange, the project will also involve modifying Benedict Road (CR 60/21) and constructing a connector road between Virginia Avenue (CR 60/10) and US 60. The EA reports that the preferred alternative will permanently impact 0.53 acres of wetlands and 631 linear feet (LF) of stream (592 LF perennial stream and 39 LF ephemeral stream). The EA discusses potential negative impacts to the mainstem of Indian Fork, a perennial stream and unnamed tributaries to Indian Fork that could be impacted by the proposed project. Indian Fork is a tributary to the Mud River, a high quality warmwater stream. However, as the project is over 3 miles from the confluence of the mud River, WRS has determined that the project is unlikely to impact the warmwater fishery of the Mud River. According to the EA and consultations with the United States Fish and Wildlife Service, the project is unlikely to directly affect mussels or bats. The EA has adequately addressed potential environmental concerns associated with construction of the Culloden Interchange.	Thank you for your comments.
Kara	Watson	karalwatson73@gmail.com	Route 1 Box 228	Milton	WV		25541	I travel to and from Poca everyday for work. I sometimes take I64 but some days I go to St Albans first and go by Route 60 through culloden. I am confused where it takes 45 minutes to an hour to get off Milton ramp and get to Culloden. I didn't even see it get that bad during fair and pumpkin festival and I grew up in Milton. I rhink its a waste. Why not fix the ramps where accidents frequently occur like St Albans / Nitro bridge on 64 or Oakwood road - Virginia Ave - Lee street in Charleston? Milton and Culloden aren't populated enough for the millions it would take to do this project.	Thank you for your comments. The project was developed to address growing concerns regarding increased traffic and congestion on I-64 between Hurricane and Milton. The project will reduce existing and forecasted traffic congestion and delays associated with the Hurricane Creek Road/I-64 interchange and provide additional access for round-trip daily traffic and freight truck movements from the Hurricane area to Huntington.