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CITY OF CHARLOTTE
DEPARTMENT OF TRANSPORTATION

May 7, 2018

Crystal C. Amschler
Project Manager
Asheville Regulatory Field Office
151 Patton Avenue, Room 208
Asheville, NC 28403

Ms. Amschler:

It is our understanding that the United States Corps of Engineers (USACE) is recommending the study of the red and orange alignments as a possible Concurrence Point 2 alternative for NCDOT project U-5768. After reviewing these study alignments, the City of Charlotte has determined that they are not consistent with multiple City policies, guidelines, and our goal of protecting and preserving existing neighborhoods. Based on our review, the City does not support further consideration of the red and orange study alignments, and offer the following information for consideration by the USACE.

The thoroughfare classification and roadway designation, as per the City's Urban Street Design Guidelines, for the realignment of Back Creek Church Road / Eastern Circumferential Roadway (ECR) is a 4-lane Boulevard. More information on Boulevards can be found in the USDG document. While City Boulevards include accommodations for the safe movement of pedestrians, bicyclists, and transit, they are intended for corridors with higher vehicular traffic volumes. Given its operational and design characteristics, a 4-lane Boulevard is not the appropriate roadway classification to traverse through existing single-family residential neighborhoods as depicted in the orange and/or red study alignments. We believe the red and orange alignments would have significant adverse impacts on the single-family homes along these local streets.

The City's Subdivision Ordinance contains standards for only local residential, commercial, or industrial streets; not higher-classification thoroughfares, such as a 4-lane Boulevard. The Subdivision Ordinance recommends that where single-family lots abut a planned or existing thoroughfare, lots are accessed by a local road and rear yards front the thoroughfare. Accessing residential lots with individual driveways along a 4-lane Boulevard is not advisable due to safety concerns with higher vehicular speeds, volumes, and numerous access points. Additionally, projected 2040 horizon year average annual daily traffic volumes are roughly

23,000 vehicles per day. These volumes would far exceed the capacity of a local residential street and would result in significant impacts to adjacent single-family homes.

The 2006 Rocky River Road Area Plan identifies an alignment that is consistent with the ECR preferred alignment. While expanded connectivity is important, and identified as a goal or guiding principle in both in the Rocky River Road Area Plan and Charlotte's overall growth framework, Centers, Corridors, and Wedges, protection and enhancement of established neighborhoods is also a priority. Centers, Corridors, and Wedges states that, "Strong and attractive neighborhoods are key to Charlotte's success and long term viability. The City places a high value on its established neighborhoods, and our quality of life is determined by their livability and character." We believe the red and orange alignments would significantly impact the quality of life, livability and character of the existing neighborhoods.

While we appreciate the opportunity to participate in the Concurrence Point 1 & 2 processes, the City of Charlotte does not support further study of the proposed red and orange study alignments, given their incompatibility with the City's existing policies and guidelines and established neighborhood patterns. Furthermore, the City does not support the significant neighborhood impacts to The Villages at Back Creek and Wyndham Place communities. We respectfully request that the red and orange study alignments be eliminated from further consideration for Concurrence Point 2.

Sincerely,

A handwritten signature in black ink that reads "Dan Gallagher". The signature is written in a cursive, flowing style.

Dan Gallagher, AICP
Charlotte DOT Deputy Director

Enclosure

Links to Referenced City Documents

- USDG:
<http://charlottenc.gov/Transportation/PlansProjects/Documents/USDG%20Full%20Document.pdf>
- Subdivision Ordinance:
<http://www.charmeck.org/Planning/Subdivision/SubdivisionOrdinanceCity.pdf>
- Rocky River Road Area Plan:
<http://www.charmeck.org/Planning/Land%20Use%20Planning/RockyRiverFinalPlan.pdf>
- Centers, Corridors, and Wedges Growth Framework:
[http://www.charmeck.org/Planning/Land%20Use%20Planning/CentersCorridorsWedges/CentersCorridorsWedges\(Adopted\).pdf](http://www.charmeck.org/Planning/Land%20Use%20Planning/CentersCorridorsWedges/CentersCorridorsWedges(Adopted).pdf)