#### Section 5

# HIGHWAY PROJECT EVALUATION

# 5.0 SAFETEA-LU Planning Factors

The SAFETEA-LU legislation centers on the growing importance of operating, managing, and increasing the safety and security of the transportation system. This focus has been translated into eight broad "areas" to be considered, analyzed as appropriate, and reflected in the planning process. Table 5.1 lists the eight factors and explains how each factor is addressed in the Plan.

Factor	How It Is Considered					
1. Support the economic vitality of the metropolitan area, especially by enabling global competitiveness, productivity and efficiency	Access to industrial parks, ports, airports, intermodal transportation facilities and military installations is provided by interstate highways and other local, state, and federal highways; all of which are included in the Long Range Plan (LRP) highway network. Projects are included in the LRP to reduce congestion and increase accessibility to these locations.					
2. Increase the safety of the transportation system for motorized and non-motorized users	Safety projects are addressed in terms of transportation facilities used by all modes of transportation: motor vehicle, transit, bicycles, and pedestrian. Safety projects are included in the Congestion Management, Safety Management, and Security Element of the Plan. Additionally, transit safety is addressed. ITS and its application for network safety is also addressed. Safety is also addressed in the Plan under the Bicycle and Pedestrian/Greenways Element, in terms of the identification of projects dedicated for bike/ped purposes.					
3. Increase the security of the transportation system for motorized and non-motorized users	Security of the transportation system is addressed in the Congestion Management, Safety Management, and Security Element of the plan. Transit security is also addressed. ITS and its application for network security is addressed.					
4. Increase the accessibility and mobility of people and for freight	The Highway Element and the Congestion Management, Safety Management, and Security Element of the plan provide relief to traffic congestion. More accessibility and mobility options are provided through the Bicycle and Pedestrian/Greenway Facilities Element and Transit Element. Freight issues are being explored.					
5. Protect and enhance the environment, promote energy conservation, improve quality of life, and promote consistency between transportation improvements and State and local planned growth and economic development patterns	The Plan includes Transportation Enhancement Activities. These are projects that improve the quality of life through funding bicycle, pedestrian, historic preservation and other projects that make communities more livable. The quality of life afforded by these projects encourages and enhances local planned growth and economic development.					
6. Enhance the integration and connectivity of the transportation system, across and between modes, for people and freight	Better integration of modes is addressed throughout the Plan. The International Intermodal Center, railroad, and trucking issues are included. In addition, the transit system operates from a transfer station.					

# **Table 5.1: SAFETEA-LU Planning Factors**

Factor	How It Is Considered
7. Promote efficient system management and operation	The Plan promotes ITS as a means to encourage efficient management and operation of the transportation system.
8. Emphasize the preservation of the existing transportation system	Preservation of the existing transportation system is accomplished through upgrading and improving substandard and deficient facilities.

Table 5.1: SAFETEA-LU Planning Factors (Continued)

# **5.1 Consistency With Other Plans**

There are general and specific directions under SAFETEA-LU (Section 6001) for the consistency requirement. 23 USC 134, Section 6001(a)(g)(3) states "The secretary shall encourage each metropolitan planning organization to consult with officials responsible for other types of planning activities.....economic development, environmental protection, airport operations, and freight movements....to coordinate its planning process....with such planning activities. Under the metropolitan planning process, transportation plans and TIPs shall be developed with due consideration of other related planning activities...."

The MPO addresses this requirement by including planning, economic development, engineering, and other technical personnel from various levels of government on the Technical Coordinating Committee (TCC). In addition, the MPO consults with agencies and officials responsible for other planning activities within the Study Area that are affected by transportation when developing the long range transportation plan and Transportation Improvement Program (TIP). This includes Federal, State and Local agencies responsible for:

- Economic growth and development
- Environmental protection
- Airport operations
- Freight movement
- Land use management
- Natural resources
- Conservation
- Historic preservation
- Human service transportation providers

A contact list of these officials and agencies has been developed and is maintained, per the MPO's **Participation Plan for Transportation Planning in the Huntsville Urbanized Area,** found in **Appendix A, Policy 5** and **Policy 6** of this document. **Policy 5** specifically discusses consultation with other agencies and organizations to determine plan consistency, and **Policy 6** specifically discusses consultation with other agencies and organizations concerning environmental impacts.

A listing of all agencies and organizations contacted during this plan update and their responses are recorded in **Appendix B**. A formal request to these agencies is made to compare the draft long range transportation plan with their plans, maps, and inventories. Incorporating these key individuals in the transportation planning process allows for broad acknowledgement of

transportation planning and land use development activities at the local and regional level which can afford opportunities for cooperation and coordination. The spirit and intent of SAFETEA-LU 6001 are clear. In accordance with Public Law 109-59 policy provisions and subsequent agency interpretation, the metropolitan plan should acknowledge consistency with other plans that include transportation and land use components: Regional, Long Range, municipal and county Comprehensive and Master Plans (Airport, Multimodal, Transit, and Utility), Congestion Management Plans, Air Quality Conformity Determination, Freight, Bicycle/Pedestrian, Public Participation Process, and Environmental Plans.

#### 5.2 SAFETEA-LU Requirements for Consultation and Environmental Mitigation

SAFETEA-LU requires State transportation agencies to consult with other agencies in order to eliminate or minimize conflicts with activities that could impact or be impacted by transportation. Furthermore, transportation decisionmakers must take into account the potential environmental impacts associated with a transportation plan or plan update, in order to mitigate those impacts. Locally, the actions to be taken concerning environmental mitigation and determining environmental impacts as related to the long range transportation plan is discussed in **Appendix A, Policy 6**.

Mitigation as defined by the National Environmental Policy Act (NEPA) is really a threelevel concept. The first level is avoidance, and for transportation agencies, this could be as simple as choosing an alternative that avoids a sensitive resource, such as an historic site or a wetlands area.

The second level is minimization, which means that if avoidance is not possible, then the transportation agency takes action to minimize impact to the sensitive resource. For example, spanning a stream or wetlands area would have considerably less impact than re-channeling the stream or filling the wetlands.

The third level is mitigation, which means impact to a resource can't be avoided. Examples here include maintaining records of a historic structure that must be demolished and compensation for filled wetlands by debits from a wetlands "bank" either on-site or at some other location.

A few examples may illustrate how this hierarchy operates. Please note that for these resources there may be many more possible options to avoid, minimize or mitigate.

#### 5.2.1 Wetlands

Wetland impacts require avoidance, minimization, or mitigation by Executive Order 11990, to the extent practical.

For these resources we first try to avoid by shifting alignments. When the wetlands are narrow, for example, stream bank wetlands, we may avoid by spanning both the stream and the wet areas adjacent. That assumes a reasonable cost to avoid.

We may minimize by such actions as:

- narrowing medians,
- constructing fill slopes as steep as warranted by geotechnical investigation,
- alignment shift that may not entirely miss the wetland, but lessen the impact, or
- partial bridging

While mitigation for State projects in Alabama can utilize credits purchased from an established wetland bank, on-site mitigation may be possible by, for example, enhancing the remaining portion of the wetland to function at a higher level. Restoration/enhancement efforts for isolated wetlands are usually successful only when involving simple actions like restoring water flow to a former wetland that has been drained.

# 5.2.2 Historic Property

Historic properties are protected by both Section 4(f) of the DOT Act of 1966 (as amended) and Section 106 of the Historic Preservation Act. Section 4(f) in particular creates a high standard to pass before we can say we cannot avoid ("use") the resource. Other resources, notably publicly owned recreational lands are also protected by Section 4(f).

Therefore we mandate fairly detailed consideration of shifts to either side of each individual resource as well as all protected resources. The costs and impacts associated with these avoidance alternatives must be substantial before FHWA can agree to use the resource.

Minimization for historic property can take the form of planting to screen the view of a modern facility, restoring (e.g.) a stone wall taken by the ROW, even moving a building that is historic for architectural reasons and restoring it in an appropriate location...

Mitigation of historic property taken can be in the form of archival quality (i.e. long-lasting) photographs or line drawings of the structure to be taken. A researched, written narrative of the historical importance of the resource may also be developed. In some cases parts of the structure (e.g. approach spans to a longer bridge) may be reused in another application.

#### 5.2.3 Resources for Consultation and Environmental Mitigation

Considerations of potential environmental impacts associated with transportation projects include but are not limited to the following resources/issues, listed in **Table 5.2**:

# Table 5.2: Resources for Consultation and Environmental Mitigation

<b>Resource/Issue</b>	Why Important	Regulatory Basis	Contact				
HAZMAT Sites	Health hazards, costs, delays, liability for both State & federal projects on either existing or acquired right-of- way	State & federal law; Guidelines for Ops; ASTM E-1527	Phase-I: Design Bureau/ETS, phone 334-242- 6154 Phase-II & III: Materials & Tests Bureau, phone 334- 206-2284				
Air Quality	Public health, welfare, productivity, and the environment are degraded by air pollution	Clean Air Act of 1970; 40 CFR Parts 51 & 93; State Implementation Plan	Design Bureau/ETS, phone 334-242-6147; <u>PM-2.5</u> – Design Bureau/ETS, phone 334-242- 6315				
Noise	NoiseNoise can irritate, interrupt, and disrupt, as well as generally diminish the quality of lifeNoise Control Act of 1972; ALDOT's highway Traffic Noise Analysis Policy and Guidance						
Wetlands	Flood control, wildlife habitat, water purification; applies to both State and federally funded projects	Clean Water Act of 1977; Executive Order 11990; 23 CFR 777	Design Bureau/ETS, phone 334-242-6145; US Army Corps of Engineers, phone 251-690-2658				
Threatened and Endangered Species	Loss of species can damage or destroy ecosystems, to include the human food chain	Endangered Species Act of 1973; 7 CFR 355	Design Bureau/ETS, phone 334-242-6132; US Fish & Wildlife Service, phone 251- 441-5181				
Floodplains	Encroaching on or changing the natural floodplain of a water course can result in catastrophic flooding of developed areasExecutive Order 11 23 CFR 650; 23 CF 771		Design Bureau/ETS, phone 334-242-6145; Bridge Bureau, phone 334-242-6598				
Farmlands	Insure conversion compatibility with State and local farmland programs and policies	Farmland Protection Policy Act of 1981; 7 CFR 658	Design Bureau/ETS, phone 334-242-6150; Natural Resources Conservation Service (NRCS), phone 334- 887-4500 Design Bureau/ETS, phone 334-242-6143 or 6152; Alabama Department of Economic and Community Affairs, phone 334-242-5363				
Recreation Areas	Quality of life; neighborhood cohesion	Section 6(f) of the Land and Water Conservation Fund Act; Section 4(f) of the DOT Act of 1966 (when applicable); 23 CFR 771					

Resource/Issue	Why Important	Regulatory Basis	Contact Design Bureau/ETS, phone 334-242-6144 or 6225; Alabama Historical Commission, phone 334-230- 2667 Design Bureau/ETS, phone 334-242-6144 or 6225; Alabama Historical Commission, phone 334-230- 2667			
Historic Structures	Quality of life; preservation of the national heritage	National Historic Preservation Act of 1966 (Section 106); the DOT Act of 1966 [Section 4(f)]; 23 CFR 771; 36 CFR 800				
Archaeological Sites	Quality of life; preservation of national and Native American heritage	National Historic Preservation Act of 1966 (Section 106); the DOT Act of 1966 [Section 4(f)]; 23 CFR 771; Executive Order 13175				
Environmental Justice	To avoid, minimize, or mitigate disproportionately high impacts on minorities and low-income populations; basic American fairness	Title VI, Civil Rights Act of 1964; Executive Order 12898	Design Bureau/ETS, phone 334-242-6529 or 6576; right- of-way office in each respective ALDOT Division			

Table 5.2: Resources for Consultation and Environmental Mitigation (Continued)

In each of the examples given above, the first contact listed is the ALDOT's Design Bureau Environmental Technical Section (ETS), not because it is a "resource agency" as defined by federal regulations, but because it has the multidisciplinary experts who can guide the MPO through the early identification of impacts in the initial project planning and development stage. The sooner a potential environmental impact is identified, the more likely it can be avoided, minimized, or mitigated. Early contact with the ETS can insure timely consultation with all potentially affected stakeholders and compliance with provisions of the National Environmental Policy Act (NEPA) and its enforcing regulations.

# 5.3 Environmental Factors and Land Use

An overview of environmental factors and land use must be conducted to determine the viability of proposed projects. In order to assess the impacts of the planned transportation improvements in the area, the following environmental/land use factors were considered:

# 5.3.1 Air Quality

The Huntsville urban area is presently classified as an attainment area for all criteria pollutants [pollutants for which EPA has promulgated National Ambient Air Quality Standards (NAAQS) under the Clean Air Act]. In 2008, EPA lowered the ambient standard for ozone to 75 ppb (parts per billion) and Madison County was included on the list of recommended non-attainment areas submitted by the State of Alabama to EPA in March 2009. However, as of September 2009, it appeared that Madison County would attain the standard prior to designations being made with the inclusion of the data from the 2009 ozone season. EPA was scheduled to make the designations under the 2008 standard in March 2010, but has delayed the designation process pending further revisions to the ozone standard. In all likelihood the standard will be tightened further, and EPA has

indicated their intention to publish proposed revisions to the standard in December 2009, promulgate a final rule in August 2010, and designate areas as attainment or non-attainment under the revised standard in August 2011. Depending on the stringency of the revised standard, the Huntsville area could be designated as a non-attainment area in 2011.

The latest **Air Quality Report** (February 2009) published by the City of Huntsville's Department of Natural Resources, indicates that nearly 70% of the ozone precursor emissions (oxides of nitrogen and volatile organic compounds) in the area comes from mobile sources. While substantial reductions in emissions from individual vehicles have occurred due to Federal limitations on fuel volatility and national tailpipe emissions standards, increases in VMT (Vehicle Miles Traveled) have partially offset these reductions in many parts of the country. With stricter tail-pipe standards taking effect in 2004, and with imposition of tighter 2007 and 2010 diesel emissions standards, on-road emissions of ozone precursors should decrease in the coming years as a result of fleet turnover. However, further improvements in the transportation network to reduce congestion and improve connectivity are necessary to ensure these air quality benefits are actually realized.

#### **5.3.1.1 Transportation Conformity**

Transportation conformity is an analytical process required of MPOs in non-attainment and maintenance areas as a result of the Clean Air Act Amendments of 1990. SAFETEA-LU links compliance with conformity requirements to continued funding of transportation plans, programs and projects. States and MPOs must demonstrate, through the conformity process, that the transportation investments, strategies and programs they choose, taken as a whole, have air quality impacts consistent with the State Implementation Plan (SIP). Emissions from mobile sources may not exceed the SIP targets.

The State and MPO are responsible for deciding what transportation investments the area will make to attain the standards. Emissions reduction targets for mobile sources can be achieved through programs that address vehicle emissions (use of reformulated gasoline, implementation of inspection/maintenance programs), by changing how we travel (ridesharing or use of transit) or congestion mitigation programs (traffic signal synchronization).

# 5.3.1.2 CMAQ Funds

The Congestion Management and Air Quality (CMAQ) Program was reauthorized in SAFETEA-LU. The primary purpose of the CMAQ is to fund transportation projects and programs in non-attainment and maintenance areas which reduce transportation-related emissions. Over \$8.61 billion dollars will be authorized nationwide over the 5-year program (2005-2009), with annual authorization amounts increasing each year during this period.

#### **5.3.2 Cemeteries/Historic Properties**

Cemeteries (public and private) were located using information from United States Geological Survey (USGS) Quad Maps and from a cemetery inventory map. Copies of the USGS Quad Maps are kept on file in the City of Huntsville Planning Division Facility Inventory Data Base. A copy of the cemetery inventory map is located in the Huntsville/Madison County Public Library.

Historic properties are properties listed on or eligible for the National Register of Historic Places, and/or are designated as National Historic Landmarks and/or are located in a Locally Designated Historic District. This information is kept on file in the City of Huntsville Planning Division Facility Inventory database; however, information concerning eligible properties must be determined by field investigations conducted by qualified personnel.

#### 5.3.3 Potential Protected and Protected Lands/Champion Trees

Potentially Protected and Protected Lands are from an inventory of properties that have been acquired by, or have been designated as having the potential to be acquired by, the non-profit Huntsville Land Trust.

Champion Trees are those trees that are considered to be of state and/or national significance due to their outstanding size. This information is available from the Alabama Forestry Commission.

# 5.3.4 Parks and Recreation/Landfills

The parks and recreation facilities inventoried include City of Huntsville neighborhood and community park and recreation facilities as well as Madison County park and recreation facilities. This information is kept on file in the City of Huntsville Planning Division Facility Inventory database.

The locations of the known landfills (licensed and unlicensed) were provided by the Environmental Services Division of the Madison County Health Department.

# 5.3.5 Topography

The topographical features of the study area (including slopes, mountains and depressions) were derived from USGS Quad Maps. Copies of these maps are kept on file in the City of Huntsville Planning Division Facility Inventory database.

# 5.3.6 Floodplains

The locations of the floodplains are designated by the Federal Emergency Management Agency (FEMA). Copies of the maps depicting the locations of the floodplains are kept on file in the City of Huntsville Planning Division Facility Inventory database.

# 5.3.7 Wetlands

The U.S. Fish and Wildlife Service designate the location of wetlands. Copies of the maps depicting the locations of the wetlands are kept on file in the City of Huntsville Planning Division Facility Inventory database.

#### 5.3.8 Other

The locations of utility delivery points, universities, public properties, industrial parks, hospitals, water treatment plants, sewage treatment plants, and Redstone Arsenal facilities are found in this category. This information is kept on file in the City of Huntsville Planning Division Facility Inventory Data Base.

#### 5.4 Environmental Mitigation and Climate Change

#### 5.4.1 Federal Assessment

"According to the FHWA report Integrating Climate Change into the Transportation Planning Process, there is general scientific consensus that the earth is experiencing a long-term warming trend and that human-induced increases in atmospheric greenhouse gases (GHGs) may be the predominant cause. The combustion of fossil fuels is by far the biggest source of GHS emissions. In the United States, transportation is the largest source of GHG emissions, after electricity generation. Within the transportation sector, cars and trucks account for a majority of emissions.

Opportunities to reduce GHG emissions from transportation include switching to alternative fuels, using more fuel efficient vehicles, and reducing the total number of miles driven. Each of these options requires a mixture of public and private sector involvement. Transportation planning activities, which influence how transportation systems are built and operated, can contribute to these strategies. In addition to contributing to climate change, transportation will likely also be affected by climate change. Transportation infrastructure is vulnerable to predicted changes in sea level and increases in severe weather and extreme high temperatures. Long-term transportation planning will need to respond to these threats."

Introduction to Integrating Climate Change into the Transportation Planning Process - Federal Highway Administration, Final Report, July 2008

#### 5.4.2 Local Assessment

All corridors identified for improvement have been analyzed for environmental concerns, so that mitigation activities can be considered during the planning phase. Discussions are also held with other agencies as applicable to determine any environmental concerns regarding the overall proposed future plan network. It is hoped that through close coordination with the appropriate entities, that creative environmental mitigation strategies may be developed prior to the project design phase. The aggressive screening of projects, as shown in **Table 5.3**, can lead to various mitigation strategies that may achieve a balance between economic concerns and environmental stewardship. **Table 5.3** illustrates the proposed transportation improvements in relation to the environmental and land use factors listed in the previous section. While a more detailed study, such as the Environmental Assessment, is required once a project is selected for design and construction, the overview presented in this plan is only a brief synopsis of preliminary findings.

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27       Jeff Rd (Ph 2)       Capshaw Rd       Douglass Rd         28       Jeff Rd (Ph 3)       Douglass Rd       AL Hwy 53         29       Johns Road       Plummer Rd       Old Monrovia Rd         30       Jordan Rd (Ph 1)       Homer Nance Rd       U.S. 72 East         31       Jordan Rd (Ph 1)       Homer Nance Rd       U.S. 72 East         33       Martin Rd       Zierdt Rd       Laracy Dr         34       Martin Rd       Zierdt Rd       Rideout Rd         35       Maysville Rd Connector       Maysville Rd       Epworth Dr         36       Memorial Parkway       N. of Whitesburg-S. of Golf Rd       Immorial Parkway         39       Memorial Parkway       Meridianville Bottom Rd       Immorial Parkway         39       Memorial Parkway       N. of Whitesburg-S. of Golf Rd       Immorial Parkway         41       Memorial Parkway       Green Cove Rd       Immorial Parkway       Immorial Parkway         43       Memorial Parkway       Green Cove Rd       Immorial Parkway       Immorial Parkway         44       Memorial Parkway       Green Cove Rd       Immorial Parkway       Immorial Parkway         45       Memphis to Atlanta Hwy       Southem Bypass       Immorial Parkway       Immorial P
28       Jeff Rd (Ph 3)       Douglass Rd       AL Hwy 53         29       Johns Road       Plummer Rd       Old Monrovia Rd         30       Jordan Rd (Ph 1)       Homer Nance Rd       U.S. 72 East         31       Jordan Rd (Ph 2)       Moores Mill Rd       Homer Nance Rd         32       King Drake Rd - 431 Connector       King Drake Rd       U.S. 431         33       Martin Rd       Zierdt Rd       Laracy Dr         34       Martin Rd       Zierdt Rd       Rideout Rd         35       Mesnille Rd Connector       Maysville Rd       Epworth Dr         36       Memorial Parkway       N. of Whitesburg-S. of Golf Rd       Image: Connector         38       Memorial Parkway       Merdianville Bottom Rd       Image: Connector         39       Memorial Parkway       Merdianville Bottom Rd       Image: Connector         39       Memorial Parkway       N. of Whitesburg-S. of Golf Rd       Image: Connector         41       Memorial Parkway       N. of Whitesburg-S. of Golf Rd       Image: Connector         42       Memorial Parkway       N. of Whitesburg-S. of Golf Rd       Image: Connector         43       Memorial Parkway       Noftem Bypass       Image: Connector         44       Memorial Parkway </td
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47       Meridian St (PH 1)       Winchester Rd       Memorial Parkway         48       Meridian St (PH 2)       Oakwood Ave       Pratt Ave         49       Mill Rd       County Line Rd       Hughes Rd         50       Moontown Rd       Ryland Pike       U.S. 72 East       Image: County Line Rd         51       Moores Mill Rd       Winchester Rd       Northern Bypass       Image: County Line Rd         52       Mt Lebannon       Grimwood Rd       Northern Bypass       Image: County Line Rd         53       Nance Rd       University Dr       Capshaw Rd       Image: County Line Rd         54       Northern Bypass (PH 2)       East of Pulaski Pike       U.S. 231       Image: County C
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64 Old Madison Pike Hughes Rd Slaughter Rd
65 Old Railroad Bed Rd (PH 1) U.S. 72 West Capshaw Rd
66 Old Railroad Bed Rd (PH 2) Capshaw Rd AL Hwy 53
67 Patton Rd         Aerobee Rd         Redstone Rd
68 Plummer Rd Research Park Blvd Indian Creek Rd
69 Portal Ln Extension Shelton Rd Zierdt Rd Extension
70 Powell Rd Powell Rd Brownsferry Rd
71 Research Blvd and Interchanges I-565 Ardmore Hwy - AL 53

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72	Ryland Pike	U.S. 72	Northern Bypass									
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74	Shields Rd	Jordan Rd	Winchester Rd									
75	Slaughter Road	Madison Blvd	U.S. 72 West									
76	Southern Bypass (PH 1)	I-565	Martin Rd			Ī	Ī	l			1	
77	Southern Bypass (PH 2)	Martin Rd	Weatherly Rd Ext									
78	Southern Bypass (PH 3)	Weatherly Rd Ext	U.S. 231									
79	Sullivan St	Royal Dr	Front St									
80	Swancott Rd	1-565	County Line Rd									
81	U.S. 72 East/ARC Corr V	Moores Mill Rd & Shields Rd										
82	U.S. 72 East/ARC Corr V	Jordan Rd Extended										
83	U.S. 72 East/ARC Corr V	Moontown Rd										
84	U.S. 72 East/ARC Corr V	Brock Rd										
85	U.S. 72 East/ARC Corr V	Eastern Bypass										
86	U.S. 72 East/ARC Corr V Interchange	High Mountain Rd										
87	U.S. 72/University Dr	Providence Main Blvd	County Line Rd									
88	U.S. 72/University Dr	County Line Rd	Mooresville Rd									
89	Wall Triana Hwy	Mill Rd	U.S. 72 West									
90	Wall Triana Hwy	U.S. 72 West	Capshaw Rd									
91	Wall Triana Hwy	Capshaw Rd	Yarborough Rd									
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93	Winchester Rd (PH 2)	Dominion Cr	Naugher Rd					l	l	Î	1	
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95	Winchester Rd (PH 4)	Bell Factory Rd	State Line									
	Zierdt Rd (PH 1)	Madison Blvd	South of Martin Rd									
97	Zierdt Rd (PH 2)	South of Martin Rd	Beadle Ln									
98	Zierdt Rd Ext	1/4 mi N. of Madison Blvd	Old Madison Pike									
99	Zierdt Rd/Kellner Rd Corridor	Kellner Rd	Zierdt Rd									

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