

North Carolina Department of Transportation
PROJECT ENVIRONMENTAL CONSULTATION FORM
I. D. No. U-2524 C

I. GENERAL INFORMATION

- a. Consultation Phase: Right of Way
- b. Project Description: Greensboro Western Loop from North of SR 2176 (Bryan Boulevard) to US 220 (Battleground Avenue):
- c. Federal Project: STP-NHF-124(1)
- d. WBS Element No.: 34820.1.2
- e. Document Type: Final Environmental Impact Statement, February 28, 1995
Record of Decision, August 17, 1995

II. CONCLUSIONS

The above environmental document has been reevaluated as required by 23 CFR 771. It was determined that the current proposed action is essentially the same as the original proposed action. Proposed changes, if any, are noted below in Section III. It has been determined that anticipated social, economic, and environmental impacts were accurately described in the above referenced document(s) unless noted otherwise herein. Therefore, the original Administration Action remains valid.

III. CHANGES IN PROPOSED ACTION AND ENVIRONMENTAL CONSEQUENCES

DESIGN CHANGES

Various minor design changes were made since the completion of the Record of Decision (ROD) in 1995. Areas outside of the original study area have been reviewed for additional impacts to wetlands, streams, protected species, architectural history, archaeology, and noise and air quality. The following minor design changes were made:

The Greensboro Urban Loop will now be constructed as a six-lane facility instead of four-lane facility due to updated future traffic forecasts. The revisions were discussed in a meeting between NCDOT and FHWA, and based on this discussion, the revisions to the design were considered minor.

Two 4,200-foot long bridges will be constructed to accommodate the Greensboro Urban Loop at the Battleground Avenue interchange to avoid 1,600 feet of impacts to Horsepen Creek and its tributaries and 10.24 acres of wetlands in the area. Because of this bridging, Drawbridge Parkway will now pass under the Loop instead of crossing over the Loop. The revisions were discussed in a meeting between NCDOT and FHWA, and based on this discussion, the revisions to the design were considered minor.

The Greensboro Urban Loop alignment between Horsepen Creek Road and Battleground Avenue was shifted south to avoid over 2,600 feet of impacts to perennial streams. This alignment shift moved the Loop closer to Kernodle Middle School and the Carolyn S. Allen Community Park and Athletic Complex. NCDOT and the City of Greensboro worked jointly during the development phase of the park to avoid impacts to the facility. The roadway design plans include retaining walls and other measures to further minimize impacts to these properties. This southerly shift also moved the Loop further away from Caldwell Academy and its ballfields. Even though the Loop is closer to Kernodle Middle School, no additional impacts will be experienced by the school since the school building is approximately 950 feet away from the Loop. The shift was discussed in a meeting between NCDOT and FHWA, and based on this discussion, the revisions to the design were considered minor.

The City of Greensboro has future plans to widen Horsepen Creek Road to a four-lane divided facility with curb and gutter and sidewalks. This construction is scheduled to occur at the same time the Greensboro Urban Loop will be constructed. The original plans showed a proposed two-lane bridge to be constructed as part of the Loop project. The 4-lane structure on Horsepen Creek Road that will accommodate the proposed City of Greensboro's Horsepen Creek Road widening project is currently being designed and will be incorporated into the Loop construction plans. Any impacts associated with this revised design will be noted in the construction consultation or next Federal action for this project.

WATER RESOURCES

Water resource classifications have not changed since the FEIS was completed. Water resources within the project area are all located within the Cape Fear River Basin [US Geological Survey (USGS) Hydrologic Unit 03030002]. The following streams occur within the project study area: Horsepen Creek and Richland Creek and their unnamed tributaries.

Neither High Quality Waters (HQW), Water Supplies (WS-I: undeveloped watersheds or WS-II: predominately undeveloped watersheds), nor Outstanding Resource Waters (ORW) occur within 1.0 mile of the project study area. Horsepen Creek occurs within the project study area and is listed on the Final 2006 303(d) list of impaired waters due to "impaired biological integrity."

FEDERALLY PROTECTED SPECIES

At the time the FEIS was published, the USFWS listed no federally threatened or endangered species in Guilford County. As of September 22, 2010, the U.S. Fish and Wildlife Service (USFWS) lists the small whorled pogonia (*Isotria medeoloides*) as the only federally protected species for Guilford County. Surveys for small whorled pogonia were conducted by NCDOT biologists on May 18th - 20th, 2009 in areas of suitable habitat. No specimens were found. A review of the North Carolina Natural Heritage Program (NCNHP) database on May 22, 2009, indicated no occurrences of small whorled pogonia within one mile of the project study area. Therefore, the biological conclusion of 'No Effect' was determined for small whorled pogonia.

AIR QUALITY

EPA amended the Transportation Conformity rule on March 10, 2006 requiring a hot-spot analysis to determine project-level conformity in PM_{2.5} and PM₁₀ nonattainment and maintenance

areas. A hot-spot analysis is an assessment of localized emissions impacts from a proposed transportation project and is only required for "projects of air quality concern" in PM₁₀ and PM_{2.5} nonattainment and maintenance areas. The PM_{2.5} and PM₁₀ hot-spot requirements in the final rule became effective April 5, 2006. Project level conformity determinations are required pursuant to 40 CFR §93.116. and §93.123.

The Greensboro-Winston-Salem-High Point area was designated as non-attainment for the 1997 PM_{2.5} annual standard. This area includes Guilford and Davidson Counties. The Greensboro Western Urban Loop falls within the Guilford County portion of the non-attainment area. As a result, the project is required to meet Transportation Conformity requirements found in 40 CFR Part 93 as amended. A report is currently underway for projects U-2524C and U-2524D. Approval of this report from the Federal Highway Administration is needed and public comments are required. NCDOT will secure the final Project Level conformity determination for PM_{2.5} and PM₁₀ hot spot requirements no later than prior to letting the project to construction.

IV. LIST OF ENVIRONMENTAL COMMITMENTS

NCDOT will implement all practical measures and procedures to minimize and avoid environmental impacts. See attached green sheets for Project Commitments.

V. COORDINATION

Current project proposals have been discussed with others as follows:

Design Engineer: Clayton Walston April 28, 2011

FHWA Engineer: Felix Davila, PE April 28, 2011

VI. NCDOT CONCURRENCE

David M. Feller
Project Planning Engineer

5/3/11
Date

for *Beverly A. Rich*
Manager, Project Development and Environmental
Analysis Branch

5/3/11
Date

VII. FHWA CONCURRENCE

for *Felix Davila*
Federal Highway Administration
Division Administrator

5/3/11
Date

PROJECT COMMITMENTS

Greensboro Western Loop from North of SR 2176 (Bryan Boulevard)
to US 220 (Battleground Avenue)
Guilford County
WBS Element 34820.1.2
Federal Aid Project STP-NHF-124(1)
TIP Project U-2524 C

Current status, changes, or additions to the project commitments as shown in the environmental document for the project are printed in italics.

Project Development and Environmental Analysis Branch/ Human Environment Unit

Noise abatement measures which will continue to be considered throughout the design process include berms, alignment shifts and noise barriers. A detailed noise barrier evaluation will be performed during final design to determine the type and location of cost-effective noise abatement measures.

NOTE: The design noise report was completed for U-2524C in August 2007. This report did not include any proposed noise barriers within the U-2524C project limits.

A PM_{2.5} hot-spot analysis report is currently underway for projects U-2524C and U-2524D. Approval of this report from the Federal Highway Administration is needed and public comments are required. NCDOT will secure the final Project Level conformity determination for PM_{2.5} and PM 10 hot spot requirements no later than prior to letting the project to construction.

Location & Survey Unit

Geodetic survey control monuments will be located during design and the U.S. Coastal and Geodetic Survey and North Carolina Geodetic Survey will be notified of their location.

NOTE: Standard commitment.

Roadside Environmental Unit, Division Construction, Project Development and Environmental Analysis Branch/Natural Environment Unit, Hydraulics Unit

The NCDOT "Best Management Practices for Protection of Surface Waters" will be implemented where practicable to control highway runoff and minimize wetland impacts.

NOTE: Standard commitment.

Roadside Environmental Unit

During design, consideration will be given to planting trees as landscaping within the right-of-way, particularly at interchanges.

NOTE: The landscaping plans will be developed during or following construction.

Geotechnical Unit

Any underground storage tanks discovered during construction will be reported to the North Carolina Division of Environmental Management.

NOTE: If further studies indicate right of way needs to be acquired from any properties with UST's, preliminary site assessments for soil and groundwater contamination will need to be performed prior to right of way purchase.

Project Development and Environmental Analysis Branch/Natural Environment Unit, Hydraulics Unit

The final designs will be coordinated with appropriate state and local officials and the Federal Emergency Management Agency (FEMA) to assure compliance with FEMA, state and local floodway regulations. Stream channel modifications will be coordinated with appropriate review agencies. State-of-the-art stream relocation techniques will be used where practicable.

NOTE: Standard commitment.

The project will be developed in conformance with federal and state floodplain regulations.

NOTE: Standard commitment.

Issues related to dam relocation or possible stream restoration for Oka T. Hester Park will be coordinated with the City of Greensboro.

NOTE: The Oka T. Hester Park is not located within the U-2524C project limits.

Project Development and Environmental Analysis Branch/Natural Environment Unit

A final wetland mitigation plan will be coordinated with the U.S. Army Corps of Engineers and other concerned review agencies as part of the permit application. The wetland mitigation plan will be implemented and the site will be preserved in perpetuity.

NOTE: Standard permit requirement.

Project Development and Environmental Analysis Branch, Roadway Design Unit

The North Carolina Department of Transportation will continue to work with the Airport Authority during project design to minimize impact on the Piedmont Triad International Airport's access and planned expansion to the east.

NOTE: The Piedmont Triad International Airport is outside of the U-2524C project limits.

The maintenance of existing and proposed bicycle routes or greenways by grade separation and route modification will be coordinated with the City of Greensboro Department of Transportation during project design and the Guilford County Parks and Recreation Department.

NOTE: There are no bicycle routes or greenways within the U-2524C project limits.

The 4-lane structure on Horsepen Creek Road that will accommodate the proposed City of Greensboro's Horsepen Creek Road widening project is currently being designed and will be incorporated into the Loop construction plans. Any impacts associated with this revised design will be noted in the construction consultation or next Federal action for this project.

Project Development and Environmental Analysis Branch, Roadway Design Unit, Hydraulics Unit

A more detailed study of wetland and floodplain impacts at Horsepen Creek will be prepared during final design. Horsepen Creek floodplain and associated wetlands will be bridged as deemed necessary.

NOTE: Two 4,200-foot long bridges for the Loop plus ramp bridging will be constructed to accommodate the Greensboro Urban Loop at the Battleground Avenue interchange to avoid impacts to Horsepen Creek and its tributaries and wetlands.

Project Development and Environmental Analysis Branch, Roadway Design Unit, Right of Way Branch

During right of way acquisition, NCDOT will compensate the City of Greensboro the sum of \$15,000 for additional engineering fees incurred by the city due to the redesign of the proposed Carolyn S. Allen Park. A municipal agreement will be executed for this expenditure. During the final design process, every effort will be made to avoid impacts to the Park. If impacts cannot be avoided during the final design process, a 4(f) evaluation may be necessary.