



*cc: Davis/Grimes*

U.S. DEPARTMENT OF TRANSPORTATION  
FEDERAL HIGHWAY ADMINISTRATION  
REGION FOUR  
310 New Bern Avenue, Suite 410  
Raleigh, North Carolina 27601  
August 23, 1995

In Reply Refer To:

HO-NC

Mr. H. Frank Vick, P.E.  
Manager of Planning and  
Environmental Branch  
Division of Highways  
Raleigh, North Carolina

Dear Mr. Vick:

Subject: Record of Decision, Greensboro Western Urban Loop,  
Guilford County, North Carolina, FHWA-NC-EIS-91-01-F, TIP No.  
U-2524

Attached is a copy of the Record of Decision (ROD) for the subject project, which was approved by our Regional office on August 17, 1995. The project may be advanced in the normal manner. If you have any questions, please contact Mr. Felix Davila at (919) 856-4350.

Sincerely yours,

*Nicholas L. Graf*

For Nicholas L. Graf, P.E.  
Division Administrator

Attachment

cc:  
Calvin Leggett  
D.R. Morton





U.S. Department  
of Transportation

**Federal Highway  
Administration**

# Memorandum

HDA-NC

Subject: Record of Decision  
FHWA-NC-EIS-91-01-F  
Guilford County, North Carolina

Date: August 17, 1995

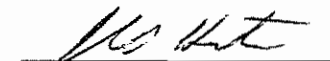
From: Director, Office of Planning and  
Program Development  
Atlanta, Georgia

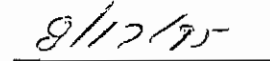
Reply to  
Attn. of: HPP-04

To: Mr. Nicholas L. Graf  
Division Administrator (HDA-NC)  
Raleigh, North Carolina

This documents the Record of Decision (ROD) (as required by 40 CFR 1505.2) for the subject project. This record incorporates the Federal and State project files and the memorandum (attached) of July 28, 1995, from Mr. Nicholas L. Graf, Division Administrator, which served as a preliminary ROD. Based upon the Environmental Impact Statement and public input, the Federal Highway Administration (FHWA) and the North Carolina Department of Transportation (NCDOT) have selected a combination of the Eastern and Western Alternatives utilizing Crossover 1. FHWA has determined that this is the environmentally preferable alternative. The preliminary ROD contains a description of the alternatives considered, measures to minimize harm, and all necessary monitoring requirements.

All correspondence received between the final EIS and the date this ROD was signed has been reviewed. Correspondence was received from the U.S. EPA; NC Wildlife Resources Commission; NC Department of Environment, Health, and Natural Resources, Division of Environmental Management; and Guilford County. Based on a review of correspondence received, we find that there have been no new, substantive issues or impacts identified. Therefore, the FEIS and the attached ROD remain valid.

  
\_\_\_\_\_  
John S. Humeston

  
\_\_\_\_\_  
Date

Attachments

cc: HEP-31



## RECORD OF DECISION

U. S. Department of Transportation  
Federal Highway Administration

Greensboro Western Urban Loop  
Guilford County, N. C.  
FHWA-NC-EIS-91-01-F  
TIP No. U-2524

### A. Decision

The proposed action for this EIS is the construction of the Greensboro Western Urban Loop, a multi-lane freeway, from I-85 south of Greensboro to Lawndale Drive. The project is approximately 15 miles in length. The Preferred Alternative incorporates the Western Alternative from the beginning of the project at Lawndale Drive to just west of Groometown Road. Crossover 1 is then followed to the Eastern Alternative and the Eastern Alternative is followed to the end of the project at I-85. This alternative and its anticipated impacts are fully discussed in the EIS, and it is identified as the environmentally Preferred Alternative.

The main purposes of the proposed Greensboro Western Urban Loop are to provide an efficient connection for major thoroughfares such as I-85, I-40, High Point Road, West Market Street, and US 220; and to improve service for local north-south traffic. The project also will improve access to the Piedmont Triad International Airport and the major employers in the western section of Greensboro from the north and south.

### B. Alternatives Considered

Three new location alternatives, a no-build alternative, transportation system management, and multi-modal alternatives were considered.

The No-Build Alternative assumes the Greensboro Urban Loop is not in place, but that other elements of the 1989 Greensboro Urban Area Thoroughfare Plan have been implemented.

Transportation System Management (TSM) alternatives consist of improvements to existing highways to allow traffic to flow smoothly and efficiently. TSM consists of improving signals and signal progression, installing a computerized signal system, adding high occupancy vehicle lanes, adding turn lanes, and making other similar improvements.

Multi-Modal System Alternatives consist of expanding transit service and ride-sharing to serve transportation demand in the study area.

Construction Alternatives investigated include widening existing roadways along two corridors and several preliminary corridors on new location. These were subsequently refined to the three most reasonable and feasible freeway alternatives. These three alternatives are described briefly below:

The Eastern Alternative basically follows the 1989 Greensboro Urban Area Thoroughfare Plan alignment. It begins at I-85 at Campground Road, crosses I-40 between Wendover Avenue (SR 1541) and NC 6 (Patterson Street), and extends northward to West Market Street (US 421) and Friendly Avenue (SR 2147). From Friendly Avenue, the Eastern Alternative generally parallels Jefferson Road and New Garden Road. The Eastern Alternative joins the Western and Middle Alternatives west of US 220 (Battleground Avenue) north of Cottswold Terrace (SR 2342) and south of Drawbridge Parkway, and extends to Lawndale Drive just north of Cottage Place. The Eastern Alternative is 11.9 miles in length.

The Middle Alternative begins at I-85 at Campground Road, crosses I-40 near Guilford College Road, crosses West Market Street near Swing Road, crosses Friendly Avenue near Meadowcreek Lane, and joins the Western Alternative just south of Fleming Road (SR 2136). The Middle Alternative extends northeastward from Fleming Road, crosses Horse Pen Creek Road (SR 2182) where it turns eastward, joins the Eastern Alternative west of US 220 (Battleground Avenue) and extends to Lawndale Drive just north of Cottage Place. The Middle Alternative is 13.6 miles in length.

The Western Alternative begins at I-85 at Campground Road, extends northwest to cross I-40 near Chimney Rock Road, crosses West Market Street and Friendly Avenue near Stagecoach Trail, and continues north to join the Middle Alternative just south of Fleming Road (SR 2136). The Western Alternative extends northeastward from Fleming Road, crosses Horse Pen Creek Road (SR 2182) where it turns eastward, joins the Eastern Alternative west of US 220 (Battleground Avenue) and extends to Lawndale Drive just north of Cottage Place. This alternative is 14.5 miles in length and is similar to the "Red Line" proposed by GREAT, a citizens group.

Three crossovers which shift between the alternatives at key locations also were studied. These crossovers enabled portions of different alternatives to be combined.

The Preferred Alternative is a combination of the Eastern and Western Alternatives, using Crossover 1. The Preferred Alternative begins at I-85 at Campground Road, and extends northward to just south of Broadacres Drive (Eastern Alternate), where it turns westward and extends to just west of Groometown Road (Crossover 1), continues west and northwest to cross I-40 near Chimney Rock Road, crosses West Market and Friendly Avenue near Stagecoach Trail, continues north to Fleming Road, and turns east to cross Lawndale Drive north of Cottage Place (Western Alternative). This alternative is 14.9 miles in length.

#### Basis for Selection of the Preferred Alternative

The Preferred Alternative was selected as the Preferred Alternative for the following reasons:

- . provides better service for I-40 traffic

- . provides better interchange design at I-40
- . requires the relocation of fewer homes
- . requires the relocation of fewer businesses than the Eastern Alternative
- . has less noise impact on residential areas than the Eastern Alternative
- . has no effect on National Register listed or eligible properties
- . does not require the taking of any Section 4(f) resources
- . impacts less wetlands than the Eastern or Middle Alternatives
- . requires less stream rechanneling
- . avoids involvement with contaminated properties

These advantages are detailed below:

#### I-40 Traffic

The Preferred Alternative provides a better path for I-40 traffic, which would be diverted from existing I-40 between the eastern terminus of the proposed I-85 Bypass to the interchange of the Western Urban Loop with I-40. Additionally, the Preferred Alternative bypasses more of existing I-40, reducing the length of I-40 that would require widening to eight lanes.

#### I-40 Interchange Design

The western location of the Preferred Alternative provides a better design and fewer conflicts with existing I-40 traffic.

#### Residential Relocations

The Preferred Alternative involves fewer residential relocations (336) than the Eastern Alternative (704), the Middle Alternative (965), or the Western Alternative (560).

#### Business Relocations

The Preferred Alternative involves fewer business relocations (16) than the Eastern Alternative (36) but more than the Middle (9) and the Western Alternatives (13).

#### Noise

The Preferred Alternative has less noise impact on residential areas (198 dwellings) than the Eastern Alternative (251 dwellings) based on the 2010 noise analysis. The Preferred Alternative has a greater impact than the Middle (153 receptors) and the Western Alternatives (170 receptors).

#### Cultural Resources

The Preferred Alternative does not involve any properties eligible for the National Register of Historic Places. The Eastern Alternative Corridor has an adverse affect on the Guilford College historic property and the Kimrey-Haworth House. The Western and Middle Alternatives require

property from the Sedgefield Stables and affect Celia Phelps Church. Under Section 4(f) of the Department of Transportation Act, these sites must be avoided if a prudent and feasible alternative exists.

#### Wetlands

The Preferred Alternative involves fewer acres of forested wetlands and fewer acres of high quality wetlands than the Eastern Alternative (20.4 acres vs. 42.9 acres total wetlands, 17.3 acres vs. 39.9 acres of high quality wetlands). The Western Alternative has least impact on wetlands, 14.8 acres. The Middle Alternative impacts 21.8 acres of wetlands.

#### Stream Channelization and Floodway Encroachment

The Preferred Alternative requires 850 feet of stream relocation and has no longitudinal floodway encroachment, versus 3,700 feet of relocation and 9,800 feet of longitudinal encroachment for the Eastern Alternative. The Middle and Western Alternatives each require 1600 feet of stream relocation.

#### Contaminated Properties

The Preferred Alternative involves no known sites of hazardous contamination within the anticipated right-of-way, based on preliminary design of the freeway to date. The Eastern Alternative involves Worth Chemical Company, a site with know serious hazardous material contamination and three other potential hazardous material sites. The Western and Middle Alternatives involve six and one potential hazardous material site, respectively.

As with any major highway project, even the best alternative raises some concerns. The Preferred Alternative has identified areas that will require additional study and coordination. These include the following:

#### Thoroughfare Plan

- . The Preferred Alternative does not conform to the location of a highway facility as shown on the adopted Greensboro Urban Area Thoroughfare Plan.

The Thoroughfare Plan is updated periodically. A future update will show the Preferred Alternative Corridor. Adjustments to network traffic projections and resulting thoroughfare needs will be addressed accordingly.

#### Eastern Corridor Traffic Needs

- . Selection of the Preferred Alternative Corridor may require consideration of a lower-type facility improvement in the area of the Eastern Alternative Corridor to serve local traffic needs.

The North Carolina Department of Transportation will continue to work with the City staff, should Greensboro pursue a project to develop this type of facility to resolve local traffic congestion. Possible

solutions that could be provided by a future project include street widening, intersection improvements, and improved traffic control.

#### Wetlands

- The Preferred Alternative has less wetland impact than the Eastern and Middle Alternatives, (20.4 acres versus 42.9 acres and 21.8 acres, respectively) but greater impact than the Western Alternative (14.8 acres).

The Preferred Alternative was selected as the only practicable alternative to achieve the benefits of the proposed action and to minimize overall impacts. In accordance with Executive Order 11990, impacts to wetlands will be avoided and minimized to the fullest extent practicable. Unavoidable wetland losses will be mitigated.

#### Cemetery

- The Preferred Alternative will involve the Persimmon Grove Church Cemetery.

Impacts to the cemetery will be minimized and, if necessary, grave relocation will comply with NCGS 65-13.

#### Recreation Facilities

- The Preferred Alternative will cross a portion of Oka Hester Park. However, when the park was developed, right of way for the roadway project was dedicated. The Preferred Alternative stays within this right of way and thus does not constitute Section 4(f) involvement.

The Preferred Alternative is near the proposed Western Greensboro Community Center but will not impact the facility. The Community Center is planned for primarily indoor uses which will not be impacted by highway noise. The future (2015) highway noise is estimated to be 64 dBA or less. The project will provide improved access to the center via Bryan Boulevard.

The Preferred Alternative crosses the Oka Hester Park bicycle route near Darden Road and proposed bicycle routes along McCuiston Road, Fleming Road, Horsepen Creek Road, and Old Battleground Road. All of the signed bicycle routes are on public streets or dedicated street right of way. Grade separations will be provided at all crossings, except the Oka Hester route and the McCuiston route. These routes will be maintained by minor route modifications that use the Wiley Davis Road overpass. The proposed Guilford County Bicentennial Greenway is designed to cross I-40 on the relocated Chimney Rock Road bridge. Planning for this greenway will be included in the I-40 widening project, TIP No. I-2201.

#### Business Relocation

- The Preferred Alternative displaces a number of businesses with large employment.



The North Carolina Department of Transportation will make every effort to locate suitable sites for relocation of businesses and industries involved.

#### Piedmont Triad International Airport

- The Preferred Alternative will pass through the eastern edge of property belonging to the Piedmont Triad Airport Authority. The North Carolina Department of Transportation and the Airport Authority have worked together to locate the Preferred Alternative to minimize impact on airport access and planned expansion to the east. Plans are currently under review by the Federal Aviation Administration. The airport master plan update will coordinate planned development with the Preferred Alternative. A letter from the Airport Authority documenting the coordination effort is attached.

The NCDOT will continue to work with the Airport Authority during project design to minimize impact on access and expansion of the Piedmont Triad International Airport.

#### C. Section 4(f)

The proposed action will not take land from a publicly owned park, historic site, wildlife or waterflow refuge, or recreation area of local, state or federal importance as determined by the officials having jurisdiction. Therefore, provisions of 49 USC 1653(f) are fulfilled. The applicable provisions of 36 CFR 800 have been fulfilled.

#### D. Measures to Minimize Harm

For the Preferred Alternative, 17 barrier locations were examined. Of the possible 17 barrier locations evaluated, eight were determined to be feasible. Based on preliminary analysis, Barrier 1, 2, 3, 4, 5, 11, 15, and 16 were estimated to provide substantial noise reduction for less than \$25,000 per dwelling unit. The estimated cost for these eight barriers is \$3,218,200. These preliminary indications of likely barrier abatement measures are based on preliminary studies and cost data. A final decision on the installation of abatement measure(s) will be made upon completion of the project design.

Mitigation of wetlands will be provided for this project as coordinated with the U. S. Fish and Wildlife Service, the U. S. Army Corps of Engineers, the Division of Environmental Management and the Wildlife Resources Commission. Preliminary investigation has identified the most suitable site for mitigation as the Horsepen Creek area near the proposed interchange with US 220.

No archaeological sites or historic structures listed on or eligible for the National Register are impacted by the Preferred Alternative, so no additional work is necessary. The State Historic Preservation Office concurs with this finding.

The Preferred Alternative will involve no longitudinal encroachment into floodways. Some encroachment within floodplain is unavoidable; however,

the project will be designed so that the 100-year flood levels are not exceeded by more than one foot.

Construction related impacts associated with the proposed action will be minimized through erosion and sediment control measures as described in the Federal Aid Policy Guide (FAPG) part 650B and the North Carolina Administrative Codes, Chapter 4 Sedimentation Control. Best Management Practices (BMPs) commonly recommended for highway construction, including mulching, sodding, diversion berms, sediment catch basins, and clean-up practices should limit excessive erosion. All practical measures will be taken to minimize environmental harm.

#### E. Monitoring and Enforcement Program

The construction staff of NCDOT and FHWA will enforce all pertinent specifications and contract provisions which are in accordance with the intent of this EIS and the welfare of the public.

#### F. Environmental Commitments

Environmental commitments for the proposed action include the following:

- A. 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.
- B. Any underground storage tanks discovered during construction will be reported to the North Carolina Division of Environmental Management.
- C. 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.
- D. The project will be developed in conformance with federal and state floodplain regulations.
- E. The NCDOT "Best Management Practices for Protection of Surface Waters" will be implemented where practicable to control highway runoff and minimize wetland impacts.
- F. 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.

- G. 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.
- H. 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.
- I. Issues related to dam relocation or possible stream restoration for Oka T. Hester Park will be coordinated with the City of Greensboro.
- J. 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.
- J. 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.
- L. During design, consideration will be given to planting trees as landscaping within the right-of-way, particularly at interchanges.

G. Comments on the Final EIS

The final statement is in conformance with the applicable provisions of 23 CFR 771 and it satisfactorily covers the anticipated environmental impacts, including physiographic and cultural effects.

Correspondence was received from the following agencies between the FEIS completion date and the date this ROD was completed:

U. S. Environmental Protection Agency  
N. C. Wildlife Resources Commission  
N. C. Department of Environment, Health, and Natural Resources,  
Division of Environmental Management  
Guilford County

All of the agency correspondence received regarding the FEIS is attached to this ROD. Responses to the substantive agency comments are as follows:

1. **U. S. Environmental Protection Agency**

Comment:

EPA had significant comments on the Draft EIS as Greensboro is a designated nonattainment area. We asked that the Final EIS address the nonattainment status both for ozone and carbon monoxide, the conformity action planned and deadlines for obtaining attainment. This document does not mention the recent attainment designation for these parameters.

Neither chapters III or IV mention the past three years of data resulting in this determination.

Response:

The project is located in Guilford County, which is within the Greensboro/Winston Salem/High Point nonattainment area for ozone (O<sub>3</sub>) as defined by the EPA. The 1990 Clean Air Act Amendments (CAAA) designated these areas as "moderate" nonattainment area for O<sub>3</sub>. However, due to improved monitoring data, these areas were redesignated as "maintenance" for O<sub>3</sub> on November 7, 1993. Section 176 (c) of the CAAA requires that transportation plans, programs, and projects conform to the intent of the state air quality implementation plan (SIP). The current SIP does not contain any transportation control measures for Guilford County. The Greensboro Urban Area 1995 Transportation Improvement Program (TIP) has been determined to conform to the intent of the SIP. The MPO approval date for the TIP is October 24, 1994. The USDOT approval date of the TIP is January 24, 1995. The current conformity determination is consistent with the final conformity rule found in 40 CFR Part 51. There has been no significant changes in the project's design concept or scope, as used in the conformity analyses.

Comment:

The Final EIS states in the table on Page IV-28 that 513 residences and 6 businesses would have noise levels exceeding criteria. Seventeen noise barrier locations were evaluated but it is not stated how many of the affected receptors would be mitigated if the mitigation is adopted. For those properties not selected for mitigation, there could be a property devaluation experienced by the owners due to the excessive noise. Has this been considered in the socio-economic costs of the project?

Response:

A detailed noise study will be prepared during final design. A determination will be made at that time regarding noise barrier location and design. Public input will be obtained where walls are warranted. Noise impacts were not included in the socio-economic costs of the project. In some cases, property may be devalued by traffic noise. In other cases, property values may increase to the proximity of freeway access. No conclusive studies are available documenting the socio-economic cost impact related to traffic noise.

Comment:

For land sparsely developed in the vicinity of the highway, there is appropriate reliance on local land use controls for managing the uses in order to limit sensitive receptors. The Final EIS should have given some indication of the city and county willingness to enforce appropriate zoning to achieve this result.

Response:

Development and enforcement of zoning and land use controls in the vicinity of the proposed project are local policy decisions. The results of all noise studies will be provided to local officials. It is the role of the city and county to determine which land uses are appropriate.

## 2. North Carolina Wildlife Resources Commission

Comment:

We are concerned about some of the Environmental Commitments included (or not included) in the Summary section of the FEIS. Items of concern are:

- 1) Commitment G. This should be a commitment to coordinate the wetland mitigation plan with all concerned review agencies. There should also be a commitment to implement the wetland mitigation plan and to preserve the site in perpetuity.
- 2) There should be a commitment to coordinate stream channel modifications with the appropriate review agencies. NCDOT should commit to use "state-of-the-art" stream relocation techniques where practicable.
- 3) Commitment I. NCDOT should commit to bridging the Horsepen Creek crossing and a portion of the associated wetlands. Bridging Horsepen Creek and a substantial portion of the adjacent wetlands would avoid some of the projected wetland impacts. If NCDOT is unable to show that wetlands have been avoided where practicable, we are not likely to comment favorably on the "404" permit application.

At this time, we concur with the FEIS for this project. However, NCDOT should recognize that if the commitments discussed above had been included in the FEIS, these issues could have been resolved prior to the "404" permit application, thus expediting the review process.

Response:

The Environmental Commitments listed in the ROD reflect these comments.

3. **Department of Environmental, Health and Natural Resources,  
Division of Environmental Management**

Comment:

I have reviewed the Final EIS for the proposed Greensboro Western Loop. I believe that the EIS is acceptable to DEM but that the following items should be addressed by DOT in the 404 Permit Application.

1. A draft mitigation plan should be sent to DEM as well as the COE for review.
2. Hazardous spill catch basins should be constructed if the stream crossing is within one mile of the critical area of all water supplies.

3. DOT's stream relocation guidelines should be followed at stream crossings.
4. Fill of wetlands should be minimized as much as possible in the vicinity of Battleground Ave. and Horsepen Creek. The 404 Permit application should address various measures to further minimize fill in this location.
5. Costs and logistical considerations concerning bridging of Horsepen Creek and its adjacent wetlands should be addressed in the Permit application.

DOT is aware that endorsement of the EIS by DEM does not preclude denial of the 401 Certification upon application if wetland impacts have not been avoided and minimized to the maximum extent practicable.

Response:

As requested, these items will be addressed in the permit application.

#### 4. Guilford County

Comment:

There is no mention or discussion on P.III-9 of the FEIS of the Guilford County Bicentennial Greenway. The Greenway is designed to cross I-40 on the relocated Chimney Rock Road bridge adjacent to the Western Loop/I-40 interchange. Figure III-2 shows future open space east of the Western Loop/I-40 interchange.

The final design for the relocated Chimney Rock Road bridge across I-40 must include a bike and pedestrian lane for the Bicentennial Greenway crossing I-40. A bike or pedestrian lane would not be feasible at the Western Loop/I-40 interchange or the Gallimore Dairy Road/I-40 interchange.

Please insure that the FEIS is amended to include the Bicentennial Greenway and the the Western Loop Final Design includes a bike and pedestrian lane for the Greenway on the Chimney Rock Road bridge over I-40.

Response:

The existing Chimney Rock Road/I-40 interchange will be removed and a bridge west of Chimney Rock Road will be constructed for local access across I-40 as part of the proposed widening of I-40, TIP No. I-2201. A bike and pedestrian lane along the relocated bridge will be addressed in the Environmental Assessment for the I-40 widening project. The request by Guilford County is beyond the scope of the Greensboro Western Urban Loop project.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

345 COURTLAND STREET, N.E.  
ATLANTA, GEORGIA 30365

JUN 16 1995

Mr. H. Franklin Vick, P.E., Manager  
Planning and Environmental Branch  
North Carolina Department of Transportation  
P.O. Box 25201  
Raleigh, North Carolina 27611-5201

Subject: Final Environmental Impact Statement  
Greensboro Western Urban Loop - Guilford County  
North Carolina T.I.P. No. U-2524 (FHW-E40736-NC)

Dear Mr. Vick:

In accordance with Section 309 of the Clean Air Act and Section 102(2)(C) of the National Environmental Policy Act, EPA Region 4 has reviewed the Final EIS and is providing the following comments.

The preferred alternative identified in the Final EIS is a 15 mile long section of a loop on new alignment. The project is proposed to serve projected suburban traffic. It is being planned concurrently with other loop segments and a I-85 bypass to the south of Greensboro.

Environmental Consequences

1. Air Quality

EPA had significant comments on the Draft EIS as Greensboro is a designated nonattainment area. We asked that the Final EIS address the nonattainment status both for ozone and carbon monoxide, the conformity action planned and deadlines for obtaining attainment. This document does not mention the recent attainment designation for these parameters. Neither chapters III or IV mention the past three years of data resulting in this determination.

## 2. Noise

The Final EIS states in the table on Page IV-28 that 513 residences and 6 businesses would have noise levels exceeding criteria. Seventeen noise barrier locations were evaluated but it is not stated how many of the affected receptors would be mitigated if the mitigation is adopted. For those properties not selected for mitigation, there could be a property devaluation experienced by the owners due to excessive noise. Has this been considered in the socio-economic costs of the project?

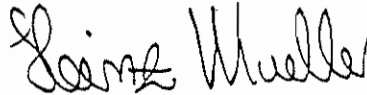
For land sparsely developed in the vicinity of the highway, there is appropriate reliance on local land use controls for managing the uses in order to limit sensitive receptors. The Final EIS should have given some indication of the city and county willingness to enforce appropriate zoning to achieve this result.

### Summary

EPA has reviewed the responses to all of our comments on the Draft EIS. Other than the problems noted with the air and noise impacts, we have no further comments to offer on the document or the preferred alternative. We continue to have concerns about how the noise impact will be dealt with in the future, and we clearly recognize that a large number of residents will be adversely impacted long term by the noise disturbance of highway operation.

Thank you for the opportunity to review the Final EIS. Please contact Ted Bisterfeld on my staff at 404/347-3776, if you wish to discuss our comments.

Sincerely,



Heinz J. Mueller  
Chief, Environmental Policy Section



State of North Carolina  
Department of Environment,  
Health and Natural Resources  
Legislative & Intergovernmental Affairs

James B. Hunt, Jr., Governor  
Jonathan B. Howes, Secretary  
Henry M. Lancaster II, Director



MEMORANDUM

TO: Chrys Baggett  
FROM: Melba McGee *W*  
RE: 95-0843 FEIS Greensboro Western Outer Loop, Guilford  
County  
DATE: June 14, 1995

The Department of Environment, Health, and Natural Resources has reviewed the proposed project. The attached comments are for the applicant's consideration.

Thank you for the opportunity to review.

attachments



## ☒ North Carolina Wildlife Resources Commission ☒

512 N. Salisbury Street, Raleigh, North Carolina 27604-1188, 919-733-3391  
Charles R. Fullwood, Executive Director

### MEMORANDUM

TO: Melba McGee  
Office of Policy Development, DEHNR

FROM: David Cox, Highway Project Coordinator  
Habitat Conservation Program *David Cox*

DATE: June 8, 1995

SUBJECT: Final Environmental Impact Statement (FEIS) for the Greensboro Western Outer Loop, from Lawndale Drive near Cottage Place to I-85 South Near Holden Road, Guilford County, North Carolina. TIP No. U-2524, SCH Project No. 95-0843.

Staff biologists with the N.C. Wildlife Resources Commission (NCWRC) have reviewed the subject FEIS and are familiar with habitat values in the project area. The purpose of this review was to assess project impacts to fish and wildlife resources. Our comments are provided in accordance with certain provisions of the National Environmental Policy Act (42 U.S.C. 4332(2)(c)) and the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661-667d).

The proposed project involves the construction of a four- to eight-lane freeway on new location from I-85 to Lawndale Drive (SR 2303), a distance of approximately 15 miles. The proposed roadway will be a median divided, full control of access freeway with interchanges at locations with major traffic movements and grade separations at minor crossroads. The proposed median width for the project varies from a 46-foot grassed median to a 22-foot paved median with a barrier.

The subject document adequately discusses benefits, social impacts, and traffic analysis of the final build alternatives. The document also adequately describes anticipated impacts to natural resources from construction of the preferred alternative, a modified version of the western alternative, here after referred to as the Modified-Western alternative.

We support NCDOT in the selection of the preferred alternative. Our comments on the Draft Environmental Impact Statement (DEIS) indicated that we favored the no-build or western alternative. The Modified Western alternative follows the Western alternative until it crosses Groometown Road, where it then follows the Eastern alternative to the southern project terminus.

Memorandum

2

June 8, 1995

We are concerned about some of the Environmental Commitments included (or not included) in the Summary section of the FEIS. Items of concern are:

- 1) Commitment G. This should be a commitment to coordinate the wetland mitigation plan with all concerned review agencies. There should also be a commitment to implement the wetland mitigation plan and to preserve the site in perpetuity.
- 2) There should be a commitment to coordinate stream channel modifications with the appropriate review agencies. NCDOT should commit to use "state-of-the-art" stream relocation techniques where practicable.
- 3) Commitment I. NCDOT should commit to bridging the Horsepen Creek crossing and a portion of the associated wetlands. Bridging Horsepen Creek and a substantial portion of the adjacent wetlands would avoid some of the projected wetland impacts. If NCDOT is unable to show that wetlands have been avoided where practicable, we are not likely to comment favorably on the "404" permit application.

At this time, we concur with the FEIS for this project. However, NCDOT should recognize that if the commitments discussed above had been included in the FEIS, these issues could have been resolved prior to the "404" permit application, thus expediting the review process.

Thank you for the opportunity to review and comment on this FEIS. If we can further assist your office, please call me at (919) 528-9886.

cc: Shari Bryant, District 5 Wildlife Biologist  
Larry Warlick, District 5 Fisheries Biologist  
Randy Wilson, NG/ES Program Manager  
Howard Hall, USFWS, Raleigh  
John Thomas, USACOE, Raleigh

State of North Carolina  
 Department of Environment,  
 Health and Natural Resources  
 Division of Environmental Management

James B. Hunt, Jr., Governor  
 Jonathan B. Howes, Secretary  
 A. Preston Howard, Jr., P.E., Director



June 12, 1995

MEMO

TO: Monica Swihart *MS* → *Melba McQueen*  
 FROM: John Dorney *J. Dorney*  
 RE: Water Quality review of proposed Greensboro Western  
 Loop  
 U-2524, State Project 6.498001T  
 Guilford County

I have reviewed the Final EIS for the proposed Greensboro Western Loop. I believe that the EIS is acceptable to DEM but that the following items should be addressed by DOT in the 404 Permit application.

1. A draft mitigation plan should be sent to DEM as well as the COE for review.
2. Hazardous spill catch basins should be constructed if the stream crossing is within one mile of the critical area of all water supplies.
3. DOT's stream relocation guidelines should be followed at stream crossings.
4. Fill of wetlands should be minimized as much as possible in the vicinity of Battleground Ave. and Horsepen Creek. The 404 Permit application should address various measures to further minimize fill in this location.
5. Costs and logistical considerations concerning bridging of Horsepen Creek and its adjacent wetlands should be addressed in the Permit application.

DOT is aware that endorsement of the EIS by DEM does not preclude denial of the 401 Certification upon application if wetland impacts have not been avoided and minimized to the maximum extent practicable.

Please call me at 733-1786 if you have any questions.

greenlop.eis

cc: Eric Galamb  
 Central Files  
 Ron Linville, WSRO  
 David Foster



**GUILFORD COUNTY**  
**ADMINISTRATIVE OFFICES**



**County Manager**  
**HECTOR A. RIVERA**

June 1, 1995

Piedmont Triad Council of Governments (PTCOG)  
Intergovernmental Review Process  
2216 West Meadowview Road  
Greensboro, North Carolina 27407-4580

Re: FEIS - Proposed Greensboro Western  
Urban Loop  
TIP #U-2524  
State Application Identifier #95-E-4220-0843

There is no mention or discussion on P.III-9 of the FEIS of the Guilford County Bicentennial Greenway. The Greenway is designed to cross I-40 on the relocated Chimney Rock Road bridge adjacent to the Western Loop/I-40 interchange. Figure III-2 shows future open space east of the Western Loop/I-40 interchange.

The Final Design for the relocated Chimney Rock Road bridge across I-40 must include a bike and pedestrian lane for the Bicentennial Greenway crossing I-40. A bike or pedestrian lane would not be feasible at the Western Loop/I-40 interchange or the Gallimore Dairy Road/I-40 interchange.

Please insure that the FEIS is amended to include the Bicentennial Greenway and that the Western Loop Final Design includes a bike and pedestrian lane for the Greenway on the Chimney Rock Road bridge over I-40.

Your prompt attention to this matter is appreciated.

Sincerely

Hector A. Rivera  
County Manager

/s

cc: John Shore, Deputy County Manager  
Jim Elza, Director, Department of Planning and Development



July 20, 1995

Mr. H. Franklin Vick, P.E.  
 Manager Planning and Environmental Branch  
 DOT  
 Post Office Box 25201  
 Raleigh, NC 27611

Dear Mr. Vick:

This is to confirm that the Airport Authority staff and engineers have been coordinating the design and location of the Greensboro Western Loop with the N.C. DOT design people.

The current design and location are under review by the FAA and to date we have not received their comments.

Sincerely,

PIEDMONT TRIAD AIRPORT AUTHORITY

Edward A. Johnson  
 Executive Director

EAJ/sf

Post-It* Fax Note	7671	Date	7/20/95	# of pages	1
To	Clint Shaver	From	Ed Johnson		
Co./Dept.		Co.			
Phone #		Phone #			
Fax #		Fax #			