

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

I. GENERAL INFORMATION

- a. Consultation Phase: Right of Way (U-2524D)
- b. Project Description: Greensboro Western Loop from US 220 (Battleground Avenue) to east of Lawndale Drive
- 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.

In the vicinity of Old Battleground Road, the Greensboro Urban Loop alignment was shifted to the south to reduce impacts to streams and the Woodland Village and Cotswold Village communities. At the Liberty Square community, which was built after the alignment was shifted to the south, a retaining wall was added to reduce impacts to the town houses. The revisions were discussed in a meeting between NCDOT and FHWA, and based on this discussion, an agreement was reached on the revision.

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.

NOISE ABATEMENT

The NCDOT Traffic Noise & Air Quality Group determined several modifications to the project’s noise barrier recommendations presented in the August 2007 Design Noise Report are feasible and reasonable. All modifications were performed in compliance with the 1996 Traffic Noise Abatement Policy in effect for Project U-2524. A new noise barrier is recommended for construction in the southeast quadrant of the Battleground Avenue / Greensboro Western Urban Loop interchange. This barrier extends approximately 175 feet and provides noise reduction for the Lakemont Apartments community. A new section of noise barrier is recommended for the area between two previously-recommended barrier sections located north of the proposed Greensboro Western Urban Loop alignment, and immediately west of Lawndale Drive. This barrier now extends for a total length of approximately 1,200 feet, and provides noise reduction for residences along Regents Park Lane and Battle Forest Lane. A new noise barrier is recommended in the southeast quadrant of the Greensboro Western Urban Loop / Lawndale Drive interchange. This barrier was erroneously included in the original Traffic Noise Analysis for U-2525, which included the portion of U-2524 that extends east of Lawndale Drive. The Design Noise Report for U-2525 omitted this barrier because it is within the U-2524 project limits. The barrier extends approximately 625 feet and provides noise reduction for Battle Forest Condos.

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 PM_{2.5} hotspot analysis is currently completed and a public review and comment period will soon be underway for projects U-2524C and U-2524D. The PM_{2.5} hotspot analysis will be included as part of the construction consultation that NCDOT and FHWA will sign. NCDOT will complete the Project Level conformity determination process 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 June 9, 2011

FHWA Engineer: Felix Davila, PE June 9, 2011

VI. NCDOT CONCURRENCE

Scott M. Ladd
Project Planning Engineer

6/13/11
Date

for *Beverly Robb*
Manager, Project Development and Environmental
Analysis Branch

6/13/11
Date

VII. FHWA CONCURRENCE

For *Felix Davila*
Federal Highway Administration
Division Administrator

6/15/11
Date

PROJECT COMMITMENTS

Greensboro Western Loop from from US 220 (Battleground Avenue) to Lawndale Drive
Guilford County
WBS Element 34820.1.2
Federal Aid Project STP-NHF-124(1)
TIP Project U-2524 D

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-2524D in August 2007. This report included proposed noise barriers north and south of the Greensboro Western Loop between Old Battleground Road and Lawndale Drive within the U-2524D project limits. Three new noise barriers were recommended after a review of the 2007 report. A new noise barrier was recommended in the southeast quadrant of the Battleground Avenue / Greensboro Western Urban Loop interchange. A new section of noise barrier was recommended for the area between the two previously-recommended barrier sections located north of the proposed Greensboro Western Urban Loop. A new noise barrier was recommended in the southeast quadrant of the Greensboro Western Urban Loop / Lawndale Drive interchange.

A PM_{2.5} hotspot analysis is currently completed and a public review and comment period will soon be underway for projects U-2524C and U-2524D. The PM_{2.5} hotspot analysis will be included as part of the construction consultation that NCDOT and FHWA will sign. NCDOT will complete the Project Level conformity determination process 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-2524D 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-2524D 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: An ADA-compliant grade separation is proposed at the intersection of Old Battleground Road and the Greensboro Urban Loop to accommodate an existing bicycle and pedestrian trail as requested by the City of Greensboro.

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: The Horsepen Creek floodplain and wetlands are not located within the U-2524D project limits.