

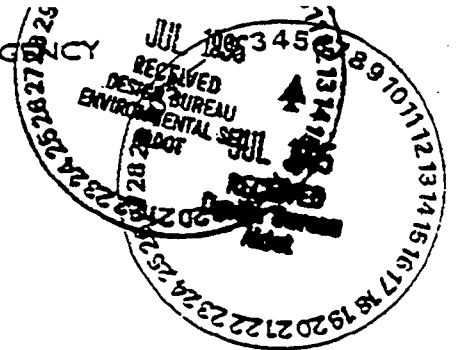


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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

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

JUL 16 1995



AML/fab

Don T. Arkle, Chief  
Design Bureau  
Alabama Department of Transportation  
1409 Coliseum Boulevard  
Montgomery, Alabama 36130

SUBJECT: Birmingham Northern Beltline  
Draft Environmental Impact Statement

Dear Mr. Arkle:

The U.S. Environmental Protection Agency has reviewed the above referenced document in accordance with its responsibilities under Section 309 of the Clean Air Act and Section 102(2)(C) of the National Environmental Policy Act. The document present alternatives and impacts associated with the construction of a 34- to 50-mile long limited access highway from I-59/20 west of the City of Birmingham to I-59 northeast of the City. The roadway would respond to traffic growth in the corridor and would increase development potential in the region.

Four alternatives were selected for final assessment. Overall the document provides a good description of potential environmental impacts associated with the proposed alternatives. However, all alternatives will have major impacts on the natural environment. A large number of floodplains will be crossed and large areas of forest and wetland resources will be destroyed or degraded.

Alternative D, the shortest at 34 miles, appears to have the least impact on natural resources. This alternative is located closest to urban areas and is the most highly developed. Still, over 2800 acres of forestland are located within its right-of-way along with 82 acres of streams, lakes and ponds. Sixty-one acres of wetlands at 66 different locations will also be affected by its construction.

We are especially concerned about losses of wetland and floodplain resources, and deciduous upland forestlands. These resources contain high quality wildlife habitat and travel corridors. They also provide other environmental amenities including water quality maintainance, floodwater storage, and control of soil erosion.

Alternate D puts the fewest total wetlands and the fewest undisturbed wetlands in jeopardy, 30 acres and 61 acres respectively. Mitigation

proposed in the document such as avoidance and bridging of wetlands, and highway side slope reduction could substantially reduce the wetland impacts for all alternatives, e.g., less than 28 acres for Alternative D. We strongly recommend that these measures be implemented wherever possible, and that they be included and discussed in the final environmental impact statement (EIS).

Compensatory mitigation including appropriate mitigation sites needs to be coordinated with the various interested agencies before the final EIS is finished as suggested in the current document. Mark LaRue of our Wetlands Regulatory Section (404/347-4015) should be contacted during this effort.

The loss of upland and bottomland forestland is major for all alternatives. The flora and fauna of these resources are an important component of the ecosystem in the project area. We strongly recommend that the higher quality deciduous forest tracts be avoided to the maximum extent possible.

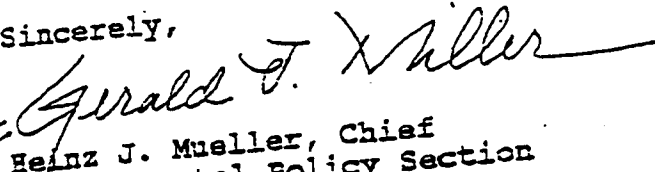
The air quality section of the draft EIS lacks documentation supporting the results of the modeling data. A list of inputs that were used in the MOBILE 4.1 model should have been included in the document. Also a map demonstrating the locations of the receptors should also have been presented. This information needs to be included in the final EIS.

Because of the heavy toll on environmental resources by all the proposed alternatives, we cannot recommend a preferred alternative.

We rate this document EC-2. Our review has identified environmental impacts that should be avoided in order to fully protect the environment. Information on wetland mitigation is lacking and should be included in the Final EIS.

We appreciate the opportunity to comment on this document.

Sincerely,

*For*   
Heinz J. Mueller, Chief  
Environmental Policy Section  
Federal Activities Branch