



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 REGION 4
 ATLANTA FEDERAL CENTER
 100 ALABAMA STREET, S.W.
 ATLANTA, GEORGIA 30303-3104

SEP 8 - 1997

AML/oea

Jimmy Butts, Director
 Alabama Department of Transportation
 1409 Coliseum Boulevard
 Montgomery, Alabama 36130-3050

FILE

SUBJECT: Birmingham Northern Beltline
 Final Environmental Impact Statement

Dear Mr. Butts:

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 presents alternatives and impacts associated with the construction and operation of a 34- to 50-mile long limited access, four-lane highway. The highway would connect I-59/20 west of the City of Birmingham to I-59 northeast of the City. Future traffic growth in the corridor would be accommodated by the roadway. Promoting development in the northern region of Birmingham is also stated as a project goal.

As stated in our letter on the draft document, all alternatives have major impacts on the natural environment. However, we had recommended that Alternative D, the shortest alignment at 34 miles, be selected. Not only would this alignment have a smaller "footprint" on natural resources but would probably generate fewer secondary impacts from future development. This alignment has subsequently been dropped because of Section 4(f) historic preservation impacts that apparently cannot be avoided.

Alternative A, the outermost alignment through the corridor, was selected as the preferred alternative. Alternative A is the longest route at 50 miles and, overall, has the most impacts to natural resources. Alternative A will disrupt streams at 14 crossings, will impact over 4050 acres forested lands within the ROW, and will destroy up to 68 acres of wetlands at 114 different sites. It also will have the greatest impact on wildlife of all the alignments discussed. Alternative A will likely generate a high level of secondary development and associated impacts to the environment.

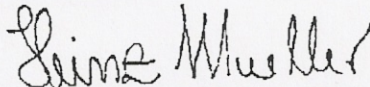
We still believe that Alternative D is the environmentally best route. Consideration should be given to relocating its western terminus to the west of the historic district. This would avoid the Section 4(f) properties and the CERCLA site to east of the historic district.

The wetland mitigation proposal outlined in the document has merit. The two sites preferred by the U.S. Fish and Wildlife Service appear to be the best candidate sites presented. Jose Negron of our Wetlands Protection Section (404/562-9422) should be contacted to discuss details of the proposal.

All final design and construction activities for this project should be examined with the purpose of avoiding as much disruption to the natural environment as possible. Where high quality resources are in jeopardy, consideration should be given to moving the alignment. All best management practices listed in the document should be employed where needed, and should be monitored and strictly enforced.

We appreciate the opportunity to review this document. Any questions should be addressed to Allen Lucas at 404/562-9624.

Sincerely,



Heinz J. Mueller, Chief
Office of Environmental Assessment
Environmental Accountability
Division