

**ADMINISTRATIVE ACTION  
RE-EVALUATION OF THE FINAL ENVIRONMENTAL IMPACT STATEMENT**

**U.S. Department of Transportation  
Federal Highway Administration  
and  
North Carolina Department of Transportation**


**GREENSBORO-HIGH POINT ROAD (SR 1486-SR 4121) IMPROVEMENTS  
GUILFORD COUNTY, NORTH CAROLINA**

**FEDERAL AID PROJECT NO: STP-4121(1)  
WBS: 34802.1.1  
TIP No: U-2412A**

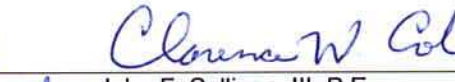
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Cooperating Agencies:  
U.S. Army Corps of Engineers

4/23/18  
Date of Approval

  
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4/25/18  
Date of Approval

  
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This re-evaluation of the Final Environmental Impact Statement (FEIS) evaluates the adequacy of the FEIS, approved May 15, 2006, by evaluating changes in the project purpose and need, the preferred alternative, affected environment, environmental impacts, and mitigation that affect the existing FEIS and other related environmental approvals. This re-evaluation finds that the 2006 FEIS is adequate, and no Supplemental EIS (SEIS) or new FEIS is warranted.

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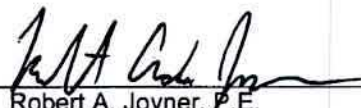
**RE-EVALUATION OF THE FINAL ENVIRONMENTAL IMPACT STATEMENT**

**April 2018**


Documentation prepared by:  
**AECOM**



4/20/2018  
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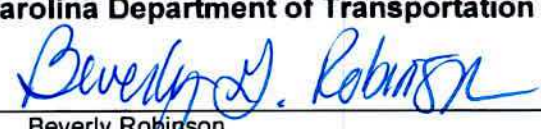
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## INTRODUCTION

The following is a re-evaluation of the Final Environmental Impact Statement (FEIS) and the Record of Decision (ROD) for the proposed Greensboro High-Point Road improvements between US 311 (I-74) in High Point and Hilltop Road (SR 1424) in Greensboro, Guilford County. This memorandum describes the methodology and the results of the re-evaluation, prepared in accordance with Title 23 CFR (Highways) Part 771.129 and Federal Highway Administration (FHWA) Technical Advisory T 6640.8A.

The proposed project is identified as U-2412 in the North Carolina Department of Transportation's (NCDOT) *2018-2027 State Transportation Improvement Program* (STIP) and is divided into Sections A and B. Section A begins at US 311 (I-74) and ends at Vickrey Chapel Road (SR 4228). Right of way acquisition for Section A is underway, and construction is funded beginning in FY 2018. Section B starts at Vickrey Chapel Road (SR 4228) and ends at Hilltop Road (SR 1424). Construction of Section B (U-2412B) was completed in 2016; therefore, this section of the project is not discussed further in this document. This re-evaluation identifies changes in the U-2412A project and project setting since the FEIS was approved on May 15, 2006, and evaluates the effect of those changes on the conclusions presented in the FEIS. **Figure 1** shows the project vicinity.

## PROPOSED ACTION

NCDOT proposes to improve Greensboro-High Point Road (SR 1486-SR 4121) from US 311 Bypass (future I-74) in High Point to Vickrey Chapel Road in Greensboro. Improvements will consist of a combination of widening existing High Point Road and building a roadway on new location with interchanges with the US 311 Bypass in High Point and the Greensboro Western Urban Loop (Future I-40). Portions of the project built on new location will have full control-of-access between at-grade intersections with existing cross-roads. Portions of the proposed project along existing High Point Road will maintain existing access and limit future driveways to one access per property.

## Project History

A Draft Environmental Impact Statement (DEIS) was prepared for the proposed action in the late 1980s and early 1990s. The DEIS, which was approved by FHWA in May 1992, documented the purpose and need for the project, the proposed alternative corridors being considered, and the potential environmental impacts. Following the publication of the DEIS, a Corridor Public Hearing was held in July 1992 to present the alternative corridors and DEIS findings to interested citizens. Following the Corridor Public Hearing, the planning process for the project stalled. Section 4(f) prohibited the selection of Alternative 1, which impacted the Sedgefield Historic District, as the preferred alternative since there were feasible and prudent alternatives that avoided the district. Alternatives 2 and 3 in the DEIS both avoided the district. At the time, local officials favored Alternative 1 and were not satisfied with either of the avoidance alternatives; consequently, the FHWA and NCDOT opted not to proceed with the project until local support for an avoidance alternative could be obtained.

With the support of local officials, FHWA and NCDOT reinitiated the development of the project in 1999. Since more than three years had passed since the DEIS was published, a re-evaluation of the DEIS was completed in June 2003 to assess the validity of the 1992 DEIS. As part of this re-evaluation process, agency concurrence was obtained on the project's purpose and need and detailed study alternatives. Updates to technical studies conducted as part of the re-evaluation process identified a number of changes in the project study area, including an additional thirteen properties/districts eligible for the National Register of Historic Places, several of which were located in Alternative Corridor 3. The findings of the DEIS Re-evaluation were presented to the public at a Public Hearing and associated open houses in fall 2003.

Agencies concurred with the selection of Alternative Corridor 2 as the Least Environmentally Damaging Practicable Alternative (LEDPA) on February 10, 2005. The Corridor Selection Committee endorsed Alternative Corridor 2 as the Preferred Alternative on December 20, 2005. A FEIS was published in May 2006 and identified Alternative Corridor 2 as the Preferred Alternative. The Federal ROD was issued on December 30, 2006.

In June 2012, prior to construction of U-2412 Section B, a re-evaluation of the FEIS was prepared and found no significant design changes from the FEIS and ROD. Since the submittal of the 2012 Re-evaluation, the following notable events have occurred:

- Scoping and coordination efforts for the construction of U-2412A began in early 2016.
- Construction of U-2412B was completed in 2016, and it has been opened for vehicle traffic.
- A Natural Resources Technical Report (NRTR) was prepared in 2017, updating information on the natural environment in the U-2412A study area.
- A Concurrence Point 4C meeting for U-2412A was held on September 21, 2017.
- An Effects meeting with the NC Historic Preservation Office (NC HPO) was held on October 31, 2017, concerning the Orville Willard House and the Oakdale Cotton Mill Village Historic District. NC HPO concurred that the preferred alternative will have no effect on the sites.
- A field review, with representatives from US Army Corps of Engineers (USACE) and NC Division of Water Resources (NC DWR), was held on November 9, 2017.
- An application for Section 404 Individual Permit, Section 401 Water Quality Certification, and Riparian Buffer Certification was submitted on February 27, 2018.
- A Design Noise Report is underway for U-2412A and is anticipated to be completed in May 2018.

## **FINDINGS**

This re-evaluation addresses changes in the proposed project and project study area, as well as changes in applicable laws and regulations, which have occurred since completion of the 2006 FEIS and ROD. It reviews the following:

- Need for the project
- Selected Alternative
- Affected Environment and Environmental Impacts
- Proposed Mitigation

### **Need for the Project**

The purpose of and need for the proposed action has not changed since the publication of the U-2412 FEIS in 2006. The project's purpose remains to: 1) increase traffic carrying capacity and improve current and future level of service along the Greensboro-High Point Road corridor; 2) enhance connectivity between US 311 Bypass, the Greensboro Western Urban Loop, and the entire transportation network in the Southwest Guilford County area; and 3) improve access between High Point, Jamestown, and Greensboro.

Improvements to the transportation network are needed to provide a primary arterial and major thoroughfare between High Point and Greensboro – two of the three cities that comprise the Triad. The existing network of two- and three-lane roadways in the area, Greensboro Road (SR 1486), Main Street in Jamestown, and High Point Road (SR 4121), are congested, and traffic volumes are anticipated to increase as the area continues to grow. High Point Road is the most continuous east-west access in Southwest Guilford County. In addition, High Point Road connects the Greensboro

Western Urban Loop (Future I-40) and I-74/US 311 Bypass of High Point. An updated traffic forecast, prepared in 2016, indicated that the existing facility is currently over capacity (operating at a LOS F) and traffic service will continue to degrade as traffic demand increases in the future. Improvements and increases in traffic carrying capacity are needed to better serve projected traffic volumes in the project area. An improved Greensboro-High Point Road will provide better east-west access between Greensboro and High Point. Better east-west access along High Point Road will enhance connectivity between I-74/US-311, the Greensboro Western Urban Loop, and thus, the entire transportation network in the growing Southwest Guilford area.

### **Selected Alternative**

Alternative Corridor 2 was identified as the Preferred Alternative in the U-2412 FEIS. Section A of the project is 3.7 miles long and begins at the US 311/I-74 interchange with existing Greensboro Road, follows Greensboro Road east to Enterprise Drive, then moves to new location to the south side of Greensboro Road and continues east until terminating at the intersection with Vickrey Chapel Road. The roadway will be a four-lane, divided arterial with a 46-foot depressed median with outside shoulders and a design speed of 60 miles per hour (mph). It will include bridges over Oakdale Road and the existing Norfolk Southern Railroad, between N. Scientific Street and Dillon Road. Signalized intersections are proposed for the intersections of U-2412A with the following roadways: ramps to and from US 311/I-74, Enterprise Drive, realigned Greensboro Road, Manor Drive, N. Scientific Street, Dillon Road, Harvey Road, and Vickrey Chapel Road.

Alternative Corridor 2 was selected as the Preferred Alternative because:

- It was the only corridor that avoided the use of Section 4(f) resources and minimized effects to historic properties.
- DEIS Re-evaluation comments received from the public favored Alternative Corridor 2.

Only minor design changes have occurred since Alternative 2 was identified as the Selected Alternative in the U-2412 FEIS. The following changes were noted for U-2412A in the 2012 Re-evaluation:

- Generally, right-of-way extents have been reduced throughout U-2412A.
- Side-street improvements have been reduced along Enterprise Drive, Ring Street, and Hampton Drive. Improvements to Greensboro Road (SR 1486) have been reduced westward towards Lindale Drive.
- Roadway design along Manor Drive and North Scientific Street (SR 1332), north and south of the Selected Alternative, has been expanded slightly, past the right-of-way proposed in the FEIS. New improvements to Pump Station Road and Edgeview Drive have been proposed that were not part of the right-of-way depicted in the FEIS.
- Improvements to Dillon Road (SR 1334) have changed since the FEIS was approved in 2006. The right-of-way limits have been reduced north of the Selected Alternative, since the approval of the FEIS, but has been expanded along Dillon Drive, south of the corridor.
- Improvements to Oakdale Road (SR 1352) have been significantly reduced to avoid impacts to the Oakdale Cotton Mill Village Historic District.
- Improvements to Harvey Road (SR 1355) have been reduced north of the Selected Alternative, but have been slightly expanded south of the Selected Alternative. The Selected Alternative has been shifted to the south of the pond, east of Harvey Road, to avoid impacts to an unnamed tributary of Bull Creek.

Since the 2012 Re-evaluation, the hydraulic design has been completed for the project. As a result, small amounts of additional right-of-way will be required for the addition of drainage features in the following areas:

- west of Manor Drive, south of the Selected Alternative

- north of Selected Alternative, east of N. Scientific Drive
- north of Selected Alternative, west of Dillon Road
- south of Selected Alternative, west of Deep River
- north of Selected Alternative, west of Oakdale Road
- south of Selected Alternative, east of Bull Run

An updated traffic forecast was prepared for U-2412A in July 2016. Volumes in the 2016 forecast for the U-2412A alignment are comparable to the previous forecast, which was prepared in 2006; however, volumes along some intersecting roads are lower in the updated forecast. No substantial design revisions were made based on the updated traffic forecast.

All of the above roadway design revisions are minor. They do not result in any significant changes in relocations or impacts to waters of the US.

## Affected Environment and Environmental Impacts

### Human Environment

#### *Demographics*

The population of the Triad is projected to grow by 40 percent between 2009 and 2035. (Greensboro LTRP). **Table 1** summarizes total population, race, and ethnicity for the U-2412A study area. In addition, it compares population change between the data presented in the 2012 Re-evaluation (2010 Census) and the current 2011-2015 American Community Survey (ACS). The demographics of the municipalities and county included in the study area have changed since the 2012 Re-evaluation. The total population in Guilford County in 2015 was 506,763, which is a 3.8 percent growth from 2010 to 2015. This growth rate slightly outpaced that of North Carolina, which was 3.3 percent. Jamestown experienced the highest growth rate of 7.57 percent, but both High Point and Greensboro grew by 3.5 and 3.6 percent, respectively.

**Table 1. Racial and ethnic comparison of Guilford County, High Point, Jamestown, and Greensboro from 2010 to 2015**

Race/Ethnic Group	2010 Census and 2011-2015 American Community Survey											
	Guilford County			High Point			Jamestown			Greensboro		
	2010 Persons	2015 Persons	Change	2010 Persons	2015 Persons	Change	2010 Persons	2015 Persons	Change	2010 Persons	2015 Persons	Change
White	278,525	287,617	3.3%	55,989	57,777	3.2%	2,726	2,898	6.3%	130,396	135,234	3.7%
Black	158,899	169,138	6.4%	34,394	34,980	1.7%	461	233	-49.5%	109,586	117,524	7.2%
American Indian	2,594	2,328	-10.3%	579	489	-15.5%	14	0	100.0%	1,385	1,037	-25.1%
Asian	19,176	22,445	17.1%	6,345	8,932	40.8%	85	44	-48.2%	10,772	11,231	4.3%
Pacific Islander	235	281	19.6%	45	44	-2.2%	2	21	950.0%	157	207	31.8%
Other Race	17,675	13,986	-20.9%	4,573	3,096	-32.3%	39	175	348.7%	10,290	7,989	-22.4%
Two or More Races	11,302	10,968	-2.9%	2,202	2,713	23.2%	55	5	-90.9%	7,080	6,205	-12.4%
Hispanic	34,826	38,207	9.7%	8,847	9,917	12.1%	107	339	216.8%	20,336	20,732	1.9%
Total	488,406	506,763	3.8%	104,371	108,031	3.5%	3,382	3,638	7.6%	269,666	279,427	3.6%

Table 1 indicates notable population changes for the municipalities of High Point, Jamestown, and Greensboro, from the 2012 Re-evaluation to the 2011-2015 ACS. The proportion of white persons has increased in each municipality and county, overall. The proportion of black persons grew in both High Point and Greensboro, with Greensboro experiencing the highest growth rate of 7.2. The proportion of black persons in Jamestown, however, declined by 49.5 percent. The Asian

population also grew in High Point and Greensboro, with High Point experiencing a 40.7 percent increase. The Asian population in Greensboro grew at a similar rate to that of the county, 4.3 and 4.4 percent, respectively; however, the Asian population declined by 48.4 percent in Jamestown.

The Hispanic population in each community grew, but at different rates. The growth rate in Guilford County was 9.7 percent. The Hispanic population in Greensboro grew the least at 1.9 percent, and grew fastest in Jamestown, at over 200 percent. The Hispanic population in Jamestown currently is 9.3 percent of the municipality's total population. The Hispanic population in High Point grew by 12.1 percent, which was higher than that of Guilford County.

#### *Land Use and Transportation Planning*

The City of High Point updated its land use map in 2016. According to this map, U-2412A will pass through areas that are designated as Light Industrial and Low-Density Residential. A small portion of U-2412A will pass through a Moderate-Density Residential area; however, none of these areas in High Point are identified as Developmental Focus Area, Neighborhood Revitalization Target Area, or Conservation Neighborhood in the Land Use Plan for the High Point Area (2015). The Town of Jamestown Land Use Plan (2007) identifies Vacant, Single-Family Residential, and Agriculture areas in the vicinity of the Preferred Alternative. In addition, this plan states that the areas in the vicinity of Oakdale Road and Dillon Road are areas of Primary Growth. The remaining areas are designated as Future Growth. The Jamestown land use plan states that the area around the U-2412A Preferred Alternative should include suburban residential growth, except for the area around Harvey Road, which should include commercial growth in the future.

The Greensboro Urban Area 2035 Long Range Transportation Plan (updated in 2013) identifies U-2412 as a major regional project (Greensboro LTRP). The High Point Urbanized Area 2040 Metropolitan Transportation Plan (MTP) also identifies U-2412A as a regionally significant project for horizon year 2030. The project supports the High Point MTP's goal of improving access to Greensboro.

A comparison of existing development in the region revealed very few changes to development or land use in the vicinity of the project since 2012. A new self-storage facility located adjacent to US 311/I-74 and with an entrance on Greensboro Road appears to have opened since 2012. A residential development has been completed along Dillon Road, but it was designed and built to avoid any U-2412A construction. Additionally, a 90-acre residential/commercial development is planned at High Point Road and Guilford College Road, just north of the terminus of High Point Road at Vickrey Chapel Road. Aerial imagery from April 2017 shows that this development is currently under construction, but it would not be impacted by the proposed U-2412A project.

#### *Community Resources*

Since the 2006 FEIS and 2012 Re-evaluation, Jamestown Middle School opened with its entrance on Harvey Road. The new facility includes the Middle School building, the Haynes-Inman Education Center, and a track and athletic fields in the northern portion of the property. The school postdates the date of public knowledge and was planned and designed around the U-2412 project, so there would be no impacts from the proposed U-2412A project.

#### *Cultural Resources*

Twenty historic architectural structures and historic districts listed or eligible for listing on the National Register of Historic Places (NRHP) were located within the U-2412 area of potential effects (APE), at the time of the FEIS publication in 2006. Eight of these resources are along the U-2412B project, which has been constructed and is open to traffic. The remaining twelve resources are located along the U-2412A Section of the project. Only two of these historic resources are within close proximity to the U-2412A Selected Alternative: the Orville Williard House and the Oakdale Cotton Mill Village Historic District. The other properties are located along existing Greensboro Road/Main Street (SR 1486) and would not be affected by the project.



The Orville Williard House property lies adjacent to the U-2412A Preferred Alternative corridor, but no right-of-way would be required from the property. The historic portion of the property is located near the north side of the property along Greensboro Road, and the house is separated from the Preferred Alternative alignment by four metal self-storage buildings. Therefore, visual impacts and traffic noise generated by the Preferred Alternative are not anticipated. On October 31, 2017, the NC Historic Preservation Office (NC HPO) concurred that U-2412A would have no effect on the Orville Williard House (see NC HPO coordination in Appendix B).

The Oakdale Cotton Mill Village Historic District is located on Oakdale Road, and was originally listed in the NRHP in 1975. At that time, only properties south of the intersection of Oakdale Road and Oakdale Mill Road were included in the nomination. The Historic District boundary was revised and enlarged in 2004, based on the investigations conducted during the DEIS process for the U-2412 project, to include additional properties along Oakdale Road from its intersection with Oakdale Mill Road north to the Oakdale United Methodist Church property. The church property is considered a contributing resource to the Historic District.

Based on preliminary design plans in the FEIS, NC HPO concurred with a determination that the Preferred Alternative would have no effect on the expanded Oakdale Cotton Mill Village Historic District. No property from the historic district would be acquired; however, to minimize visual impacts to the expanded historic district, a Green Sheet Commitment was included in the FEIS that stated:

*In order to mitigate visual impacts to the Oakdale Cotton Mill Village Historic District, NCDOT will coordinate with the NC Historic Preservation Office (NC HPO) regarding the control-of-access fence to be located at the top of the cut slope adjacent to the district, the bridge rail, and guardrails on Oakdale Road (SR 1352).*

The 2012 Re-evaluation noted that NC HPO coordination associated with this commitment would be conducted when the U-2412A section of the project is funded.

Based on the final design plans currently being re-evaluated, there would be no right-of-way required from any properties associated with the Historic District. Improvements along Oakdale Road, which would be grade-separated on a bridge over the proposed facility, would tie in to existing grade at the northern property line of the Oakdale United Methodist Church property. A woven wire control-of-access fence would also end at this property line. On October 31, 2017, NC HPO determined that U-2412A would have no effect on the Historic District (see Appendix B).

Two archaeological sites were noted in the APE in the 2006 FEIS. The Iddings House (31GF259), which was determined to be potentially eligible for the NHRP, is located in Section B of the project, which has been constructed and is open to traffic. High Point Water Works (31GF260) is located in Section A of the project, at the end of Pump Station Road, east of the Norfolk Southern Railroad corridor. It is eligible for the NRHP. The archaeological site lies along a tributary to Deep River, north of the Preferred Alternative, and no right-of-way would be required from this area. U-2412A would have no effect on the High Point Waterworks. The NC HPO concurred with this determination in a letter dated October 4, 2001.

### Physical Environment

#### *Noise*

The 2006 FEIS identified 60 impacted receptors and included three reasonable and feasible noise barriers, based on the NCDOT 2004 Traffic Noise Abatement Policy. Based on the U-2412 date of public knowledge (December 30, 2006), a Design Noise Report is underway for U-2412A in accordance with the NCDOT 2011 Traffic Noise Abatement Policy. Based on the draft Design Noise Report, there are 35 impacted receptors, and noise abatement is likely in three locations, which correspond to the three barriers identified in the 2006 FEIS. The likely barriers are shown in **Figure 2** and are:



- Barrier 1 – located along the eastbound direction of U-2412A, north of Loftyview Drive
- Barrier 2 – located along the westbound direction of U-2412A, south of Crestwood Circle
- Barrier 7 – located along the westbound direction of U-2412A in the northeast quadrant of the intersection of U-2412A and Dillon Road, south of Riverwalk Lane

The final decision regarding the installation of abatement measures shall be made upon completion of the project design and public involvement process.

#### *Air Quality*

As of March 30, 2012, Guilford County is considered an attainment area for 8-hour ozone, sulfur dioxide, nitrogen dioxide, and carbon monoxide. From 2005-2010, Guilford County was classified as nonattainment for fine particulate matter (PM<sub>2.5</sub>), and re-designated as a maintenance area for fine particulate matter on December 19, 2011. In 2016, US EPA revoked the 1997 PM<sub>2.5</sub> Standard, and Guilford County is now considered to be in attainment for PM<sub>2.5</sub>. In addition, FHWA issued *Updated Interim Guidance on Mobile Source Air Toxic Analysis in NEPA Documents* in October 2016. This guidance does not affect the environmental impacts of the proposed project or the selection of the Selected Alternative.

#### *Floodplains/Floodways*

A review of the 2017 digital GIS data and current FEMA FIRMS show that the locations of the 100-year floodplains, 500-year floodplains, and floodways have not changed since the publication of the FEIS in 2006.

#### *Natural Environment*

A Natural Resources Technical Report (NRTR) was prepared in 2017, to assist in the preparation of this re-evaluation for U-2412A. It updated the previous NRTR completed in 2001, which covered sections U-2412A and U-2412B of the project.

#### *Jurisdictional Features*

Jurisdictional features were delineated in the field in April 2017, and an updated jurisdictional package was provided to the USACE. As shown in **Table 2**, several additional streams were identified during the 2017 field studies. This difference is likely due to differences in the hydroperiod between the initial delineation verified for the FEIS and subsequent field visits. This difference resulted in the observation of intermittent stream reaches extending further upstream, and leading to some intermittent/ephemeral channels previously considered borderline to be reclassified as intermittent. A field review with representatives from USACE and NC DWR was held on November 9, 2017 to review these delineations.

Impacts to jurisdictional features in U-2412A have been updated based on the 2017 delineations and field review and current design plans and are shown in **Table 3**. These impacts have been discussed with environmental regulatory and resource agencies through the NEPA/Section 404 Merger process. An application for modification of the Section 404 Individual Permit (Action ID SAW-2000-21876, dated July 18, 2012) and Section 401 Water Quality Certification and Riparian Buffer Certification (No. 003924, dated June 4, 2012) was submitted on February 27, 2018, to incorporate impacts for U-2412 Section A.

Total preliminary surface water impacts for U-2412A are now 3,073 linear feet of permanent stream impacts and 203 linear feet of temporary stream impacts. All surface waters in the study area are within the Deep River/Randleman Lake Watersheds. There will be 1.01 acres of permanent riparian wetland impacts, in addition to 0.45 acre of mechanized clearing and 0.09 acre of hand clearing, associated with this section, for a total of 1.46 acres of wetland impacts. Mitigated impacts to Zone 1 and 2 of the protected Randleman Lake watershed are respectively 235,338 square feet and 176,764 square feet.

**Table 2. Jurisdictional Features in U-2412A**

2006 FEIS Jurisdictional Features	2017 Reevaluation Jurisdictional Features	Classification
UT Lake 1	SA	Perennial
-	SB	Perennial
UT 1 Deep	SC	Perennial
-	SD	Perennial
-	SD	Intermittent
UT 2 Deep	SE	Perennial
-	SF	Intermittent
UT 3 Deep	SG	Perennial
-	SH	Intermittent
-	SI	Perennial
-	SJ	Intermittent
Deep River	Deep River	Perennial
Bull Run	Bull Run	Perennial
UT 1 Bull	SK	Perennial
UT 7 Bull, UT 3 Bull	SL	Perennial
-	SM	Intermittent
-	WA	Riparian
-	1*	Riparian
-	WB	Riparian
Wetland A	WC	Riparian
Wetland I, B	WD	Riparian
-	12*	Riparian
Wetland E	WE	Non-riparian
Wetland F	WF	Riparian

\*Feature added at site visit on November 9, 2017

**Table 3. Impacts to Jurisdictional Features on U-2412A**

Document	Permanent Stream Impacts (ft)	Temporary Stream Impacts (ft)	Wetland Impacts (acres)	Pond Impacts (acres)	Zone 1 Buffer Impacts (ft <sup>2</sup> )	Zone2 Buffer Impacts (ft <sup>2</sup> )
2006 FEIS Section A	1,791.5	0	1.14	2.53	211,702	153,331
2012 Re-evaluation Section A (Preliminary Design)	2,885	636	0.99	3.65	311,580	342,621
2018 Re-evaluation Section A (Final Design, as presented in permit application)	3,073	203	1.46	3.64	235,338	176,764

### *Protected Species*

One federally protected species has been added to the county list for Guilford County, since the approval of the FEIS in 2006. As of March 25, 2015, the U.S. Fish and Wildlife Service (USFWS) lists the federally-threatened small-whorled pogonia (*Isotria medeoloides*) orchid as occurring within Guilford County. Surveys were completed for this species in U-2412A in 2008. Additional pedestrian surveys were completed in 2017, and no occurrences were found. While habitat was determined to be present, the project is anticipated to have “No effect” on the small-whorled pogonia.

Since the 2006 FEIS was completed, the bald eagle has been removed from the endangered and threatened species list nationwide (updated on September 22, 2010). The bald eagle was delisted in August 2007, and is no longer subject to Section 7 consultation; thus, a biological conclusion is not required. However, the bald eagle remains protected by the Bald and Golden Eagle Protection Act. A desktop GIS assessment of the U-2412A study area, as well as the area within a 1.13 mile radius (1.0 mile plus 660 feet) of the project limits, was performed on May 23, 2017, using color aerials from the year 2013. Suitable habitat for bald eagle exists in the study area along the shores of High Point Lake. A review of the NC Natural Heritage Program records, updated May 23, 2017, indicated no known bald eagle occurrences within 1.0 mile of the study area. A visual survey of suitable nesting habitat was performed by biologists on July 26, 2017. No bald eagle nests were observed. The project is anticipated to have no effect on bald eagles.

### *Proposed Mitigation*

Compensatory mitigation is required for stream, wetland, and buffer impacts from this project, and will be provided by NC Division of Mitigation Services (DMS) at rate of 2:1. Mitigation will also be required for buffer impacts at a rate of 3:1 for Zone 1 and 1.5:1 for Zone 2.

### **Comments and Coordination**

#### Agency Coordination

A Concurrence Point 4C meeting was held on September 21, 2017, to review impacts and permit drawings for U-2412A. A field review with representatives from USACE and NC DWR was held on November 9, 2017.

#### Public Outreach

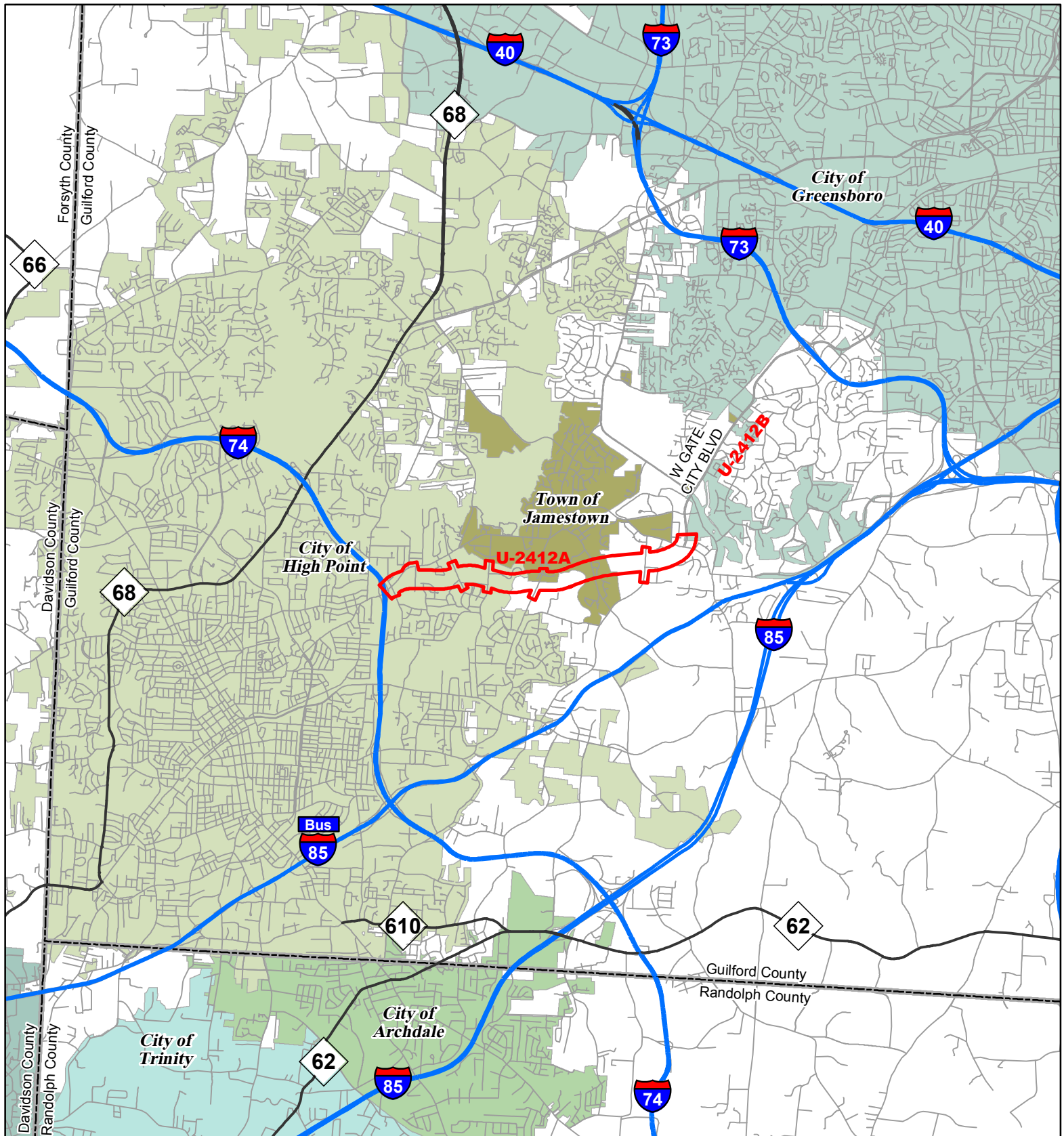
A property owners mailing list was generated in March 2017. The list contained 137 entries. A letter to landowners was mailed on March 21, 2017, informing them that representatives of NCDOT and USACE could be in the area verifying the limits of waters and wetlands, pursuant of Section 404 of the Clean Water Act and/or Section 10 of the Rivers and Harbors Act of 1899. The letter was also provided in Spanish.

Additional stakeholder meetings are anticipated, to review proposed noise barriers with adjacent property owners.

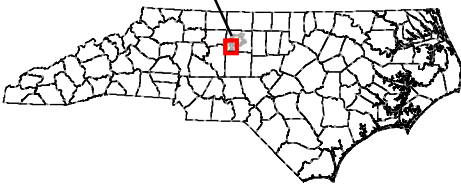
### **Conclusion**

Based on this re-evaluation of the proposed project, the FEIS and ROD adequately describe the environmental impacts of the U-2412A Greensboro-High Point Road Improvements in Guilford County. This re-evaluation examined all changes in the project purpose and need, the preferred alternative, affected environment, environmental impacts, and mitigation that affect the existing NEPA and other related environmental approvals. None of the changes noted were found to be substantial or cause the existing NEPA approval to be invalidated. Therefore, no Supplemental EIS (SEIS) or new FEIS is warranted.

## **FIGURES**



#### Project Location



#### Legend

- U-2412A Study Area
- Interstate
- NC Route
- US Route
- Local Streets
- County Boundary

0 0.5 1 2 Miles



NORTH CAROLINA DEPARTMENT  
OF TRANSPORTATION  
PROJECT DEVELOPMENT AND  
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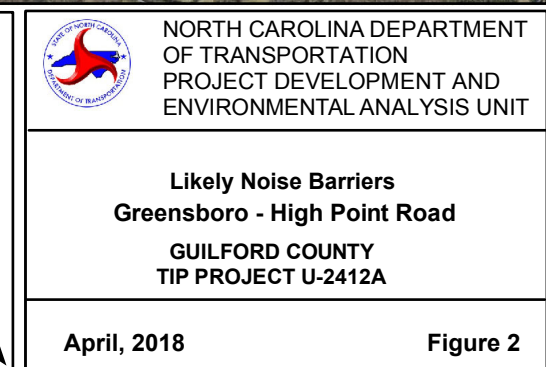
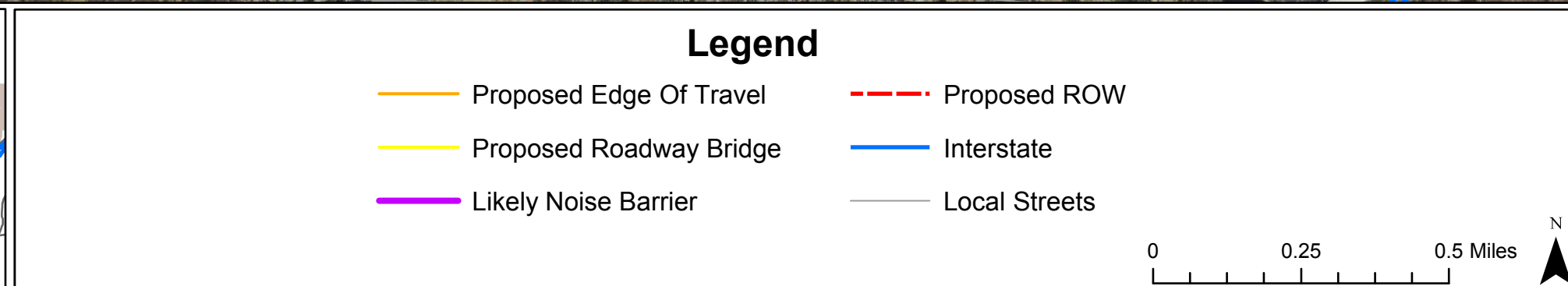
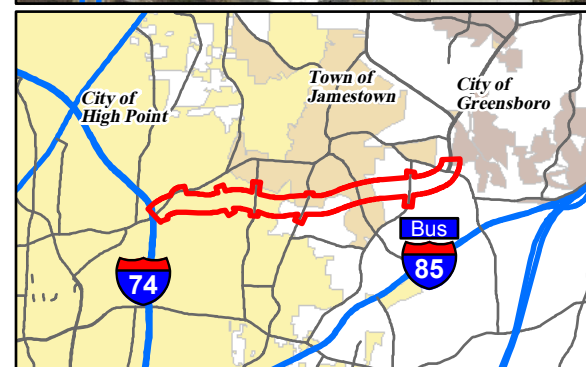
**Vicinity Map**  
**Greensboro - High Point Road**

**GUILFORD COUNTY**  
**TIP PROJECT U-2412A**

March, 2018

Figure 1







**APPENDIX A**  
**Special Project Commitments**



# **Special Project Commitments**

## **Greensboro-High Point Road Improvements**

### **Guilford County**

**Federal-Aid Project Number STP-4121(1)**  
**WBS Number 34802.1.1**  
**TIP Project U-2412A**

In addition to the Section 404 Conditions, Regional Conditions, State Consistency Conditions, NCDOT's Guidelines for Best Management Practices for the Protection of Surface Waters, General Certification Conditions, and Section 401 Conditions of Certification, the following special commitments have been agreed to by NCDOT staff. Updates to the Project Commitments appear in italics below:

#### ***Project Development and Environmental Analysis Branch***

A final design traffic noise study will be performed on the Selected Alternative (Alternative Corridor 2). The study will include, but will not be limited to, likely noise barrier locations at Loftyview Drive, Crestwood Circle, and Riverwalk Lane.

- *A design noise report is underway for U-2412A and is anticipated to be completed in May 2018. The final decision on the installation of abatement measures shall be made upon completion of the project design and public involvement process.*

#### ***Project Development and Environmental Analysis Branch Natural Environment Unit, Hydraulics Unit***

NCDOT will apply for the "general" major variance from the Randleman Lake Water Supply: Protection and Maintenance of Riparian Areas with the Pre-Notification Application Form for the 401 Water Quality Certification. Written concurrence that the conditions of the "general" major variance must be obtained from the Division of Water Quality before any activities that impact buffers may begin.

- *Since the 2006 FEIS completion, the revised version of the Randleman Lake Water Supply Buffer Rules has been enacted. Based on the new Randleman Lake buffer rules, this project is in compliance and therefore will not need a major variance.*

#### ***Hydraulics Unit, Roadside Environmental Unit***

Since the alternative corridors cross the Deep River within a critical area, high quality water sedimentation controls, in addition to NCDOT Best Management Practices for Protection of Surface Waters and Design Standards in Sensitive Watersheds, will be implemented. Hazardous spill detention basins will be provided along the new location portion of the project between Enterprise Drive and Guilford College Road (SR 1546). If feasible from a topographical standpoint, combined spill and stormwater basins will be used. Stormwater regulations set forth by the Randleman Dam Watershed Nutrient Management Strategy (Randleman Rules) will be followed during the design and construction of the proposed project.

- *No Change.*

### ***Hydraulics Unit, Roadway Design Unit***

The proposed Bull Run Creek Trail greenway is anticipated to follow Bull Run Creek. A bridge is proposed to carry the roadway over Bull Run Creek and its 50-foot buffers. The bridge will be designed to accommodate the proposed greenway on one side of the stream.

- o *No Change.*

The project will incorporate bridges to span the streams and buffers at an unnamed tributary to the Deep River (UT3), the Deep River itself, and Bull Run Creek, as discussed at Merger Concurrence Meeting 2A.

- o *No Change. Bridge are included in final design plans to span an unnamed tributary to Deep River (UT3/SG), Deep River, and Bull Run Creek.*

Wetlands associated with the Deep River will be spanned, as discussed at Merger Concurrence Meeting 4A.

- o *No Change. A bridge is included in final design plans to span Deep River and associated wetlands.*

### ***Project Development and Environmental Analysis Branch, Roadway Design Unit, Structure Design Unit***

In order to mitigate visual impacts to the Oakdale Cotton Mill Village Historic District, NCDOT will coordinate with the NC Historic Preservation Office (NC HPO) regarding the control-of-access fence to be located at the top of the cut slope adjacent to the district, the bridge rail, and guardrails on Oakdale Road (SR 1352).

- o *The NC HPO concurred on October 31, 2017, that U-2412A would have no effect on the Oakdale Cotton Mill Village Historic District (GF0015), as the project does not impact the historic property boundary. NCDOT will continue to coordinate with NC HPO through construction to ensure effects on Oakdale Cotton Mill Village Historic District are avoided.*

### ***Roadway Design Unit, Structure Design Unit***

NCDOT will coordinate with Norfolk Southern to ensure the bridge over the railroad is correctly located and is designed to span future freight, high speed rail, and potential transit tracks. This will ensure the expansion of the freight tracks and installation of the high speed rail corridor will remain compatible with the project.

- o *No change.*

### ***Roadway Design***

During the preparation of right-of-way plans, NCDOT will include bus pullovers at the project intersections with Enterprise Drive, Manor Road, Mackay Road, and Hilltop Road, provided the pullovers do not increase the number of residential or business relocations.

- o *As of February 2018, the City of High Point Transportation Department states that there is no plan for public transit along this route. As such, they request no bus turnouts for the intersections of Enterprise Drive, Manor Road or Hilltop Road.*

Along curb and gutter portions of the project, 4.2 m (14-foot) outside through lanes will be provided to accommodate bicyclists.

- o *No Change.*

***Right-of-Way, Project Development and Environmental Analysis Branch***

Once the owners of the dam at Owen Lake, between Ring Street and Manor Drive, have been identified through the Right-of-Way Branch deed research, NCDOT will provide contact information to the Division of Land Quality for their use in pursuing repair or removal of the dam.

- o *No Change.*

Project design plans will not maintain access to Oak Village Drive and Creekside Drive in the Bull Run subdivision. This decision is based on preliminary right-of-way damage estimates and public input.

- o *No Change.*

**APPENDIX B**  
**NC HPO Coordination**

Federal Aid #: STP-4121(1)

TIP#: U-2412A

County: Guilford

### CONCURRENCE FORM FOR ASSESSMENT OF EFFECTS

*Project Description:* SR 1486 - SR 4121 (GREENSBORO/ HIGH POINT ROAD) FROM PROPOSED US 311 BYPASS TO WEST OF SR 1480 (VICKREY CHAPEL ROAD). U-2412B IS UNDER CONSTRUCTION. U-2412A IS IN ROW ACQUISITION.

On October 31, 2017, representatives of the

- ☒ North Carolina Department of Transportation (NCDOT)
- ☒ Federal Highway Administration (FHWA)
- ☒ North Carolina State Historic Preservation Office (HPO)
- ☐ Other

Reviewed the subject project and agreed on the effects findings listed within the table on the reverse of this signature page.

Signed:

*Shelby Reap*

Representative, NCDOT

*Oct 31, 2017*

Date

*John Brown*

FHWA, for the Division Administrator, or other Federal Agency

*10-31-17*

Date

*Rene Shethill-Easley*

Representative, HPO

*10/31/17*

Date

State Historic Preservation Officer

Date

Federal Aid #: STP-4121(1)

TIP#: U-2412A

County: Guilford

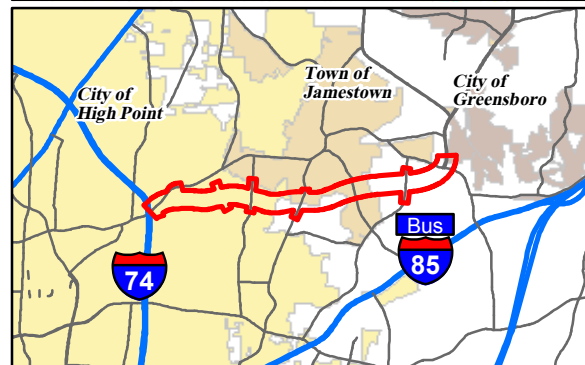
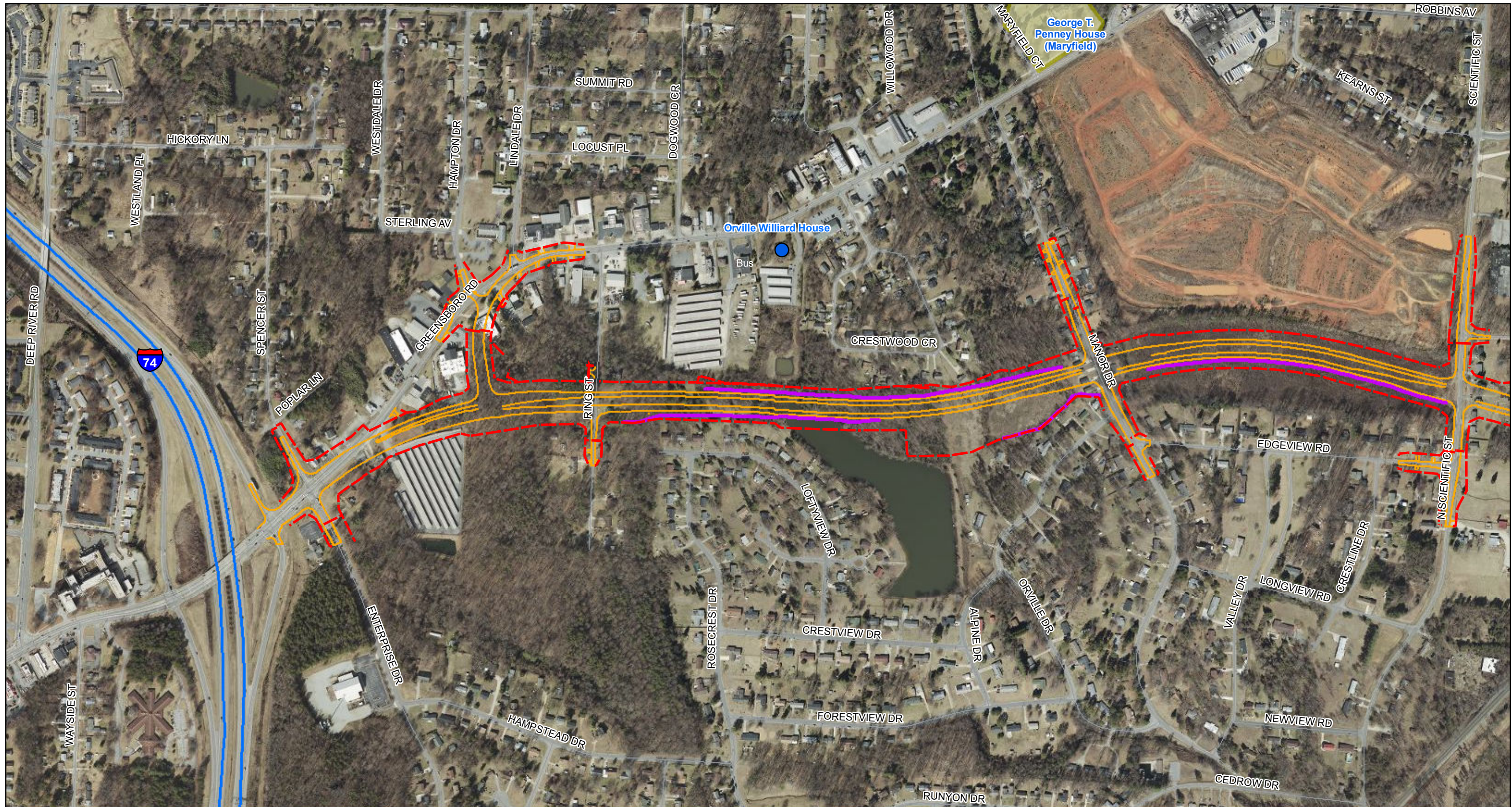
Property and Status	Effect Finding	Reasons
Oakdale Cotton Mill Village (GF3263)	No effect	Project stay away from <del>DE</del> boundary
Orville Williard House (GF1260)	No effect	No construction activity near reduced boundary

Initialed:

NCDOT SRFHWA DBHPO DB

FHWA Intends to use the NC-HPO's concurrence as a basis for a "de minimis" finding for the following properties, pursuant to Section 4(f):





**Legend**

	Orville Williard House		Proposed Edge Of Travel		Interstate
	SLDOE		Proposed Noise Barrier		
	Local Streets		Proposed ROW		

N

0 500 1,000 Feet

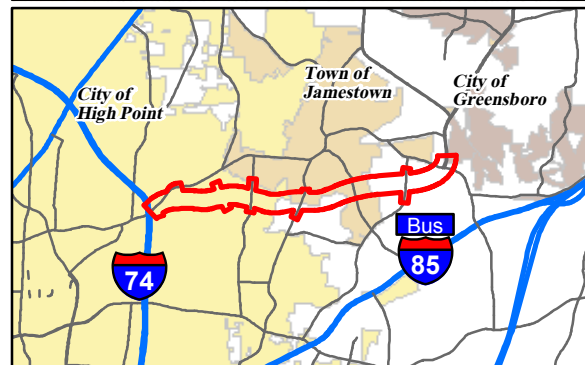
NORTH CAROLINA DEPARTMENT  
OF TRANSPORTATION  
PROJECT DEVELOPMENT AND  
ENVIRONMENTAL ANALYSIS UNIT

**Orville Williard House  
Greensboro - High Point Road**








**GUILFORD COUNTY  
TIP PROJECT U-2412A**

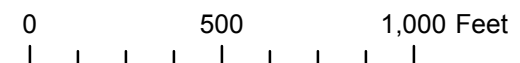
**October, 2017**





### Legend

- |  |   |  |
|--|---|--|
|  National Register   |  Proposed Edge Of Travel |  Proposed ROW |
|  Determined Eligible |  Proposed Roadway Bridge |  |
|  Local Streets       |  Proposed Noise Barrier  |  |



NORTH CAROLINA DEPARTMENT  
OF TRANSPORTATION  
PROJECT DEVELOPMENT AND  
ENVIRONMENTAL ANALYSIS UNIT

**Oakdale Cotton Mill Village  
Historic District  
Greensboro - High Point Road**

**GUILFORD COUNTY  
TIP PROJECT U-2412A**

October, 2017





OCT 10 2001

**North Carolina Department of Cultural Resources  
State Historic Preservation Office**

David L. S. Brook, Administrator

Michael F. Easley, Governor  
Lisbeth C. Evans, Secretary

Division of Archives and History  
Jeffrey J. Crow, Director

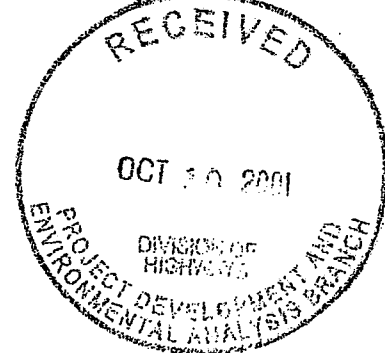
October 4, 2001

## MEMORANDUM

**TO:** William D. Gilmore, PE, Manager  
Project Development & Environmental Analysis Branch  
NC Department of Transportation

**FROM:** David Brook *for David Brook*  
Deputy State Historic Preservation Officer

**RE:** Greensboro-High Point Road (SR 4121), From Deep River Road to Hilltop Road,  
Guilford County, Federal Aid Project No. STP-4121(1), State Project No. 8.2491602,  
TIP Project No. U-2412, ER 90-7159, ER 01-9075 and ER 02-7599



Thank you for your letters of August 14, 2001, and September 4, 2001, concerning the above project. We apologize for the delay in our response.

We have reviewed the additional information provided during the August 10, 2001, meeting and the addendum to the archaeological investigation by Paul Mohler and Megan O'Connell. We concur with the evaluation that sites 31GF259\*\* and 31GF260\*\* will not be affected by the proposed road improvements and no additional investigation of these sites is warranted.

We also concur with Mr. Mohler's and Ms. O'Connell's recommendation that site 31GF258\*\* is not eligible for the National Register of Historic Places under criterion D. No additional archaeological investigations are recommended in connection with this project as currently proposed.

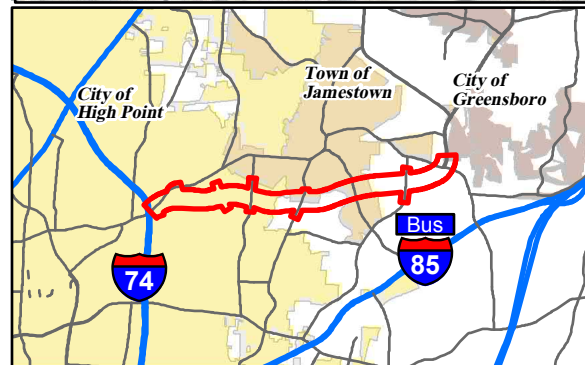
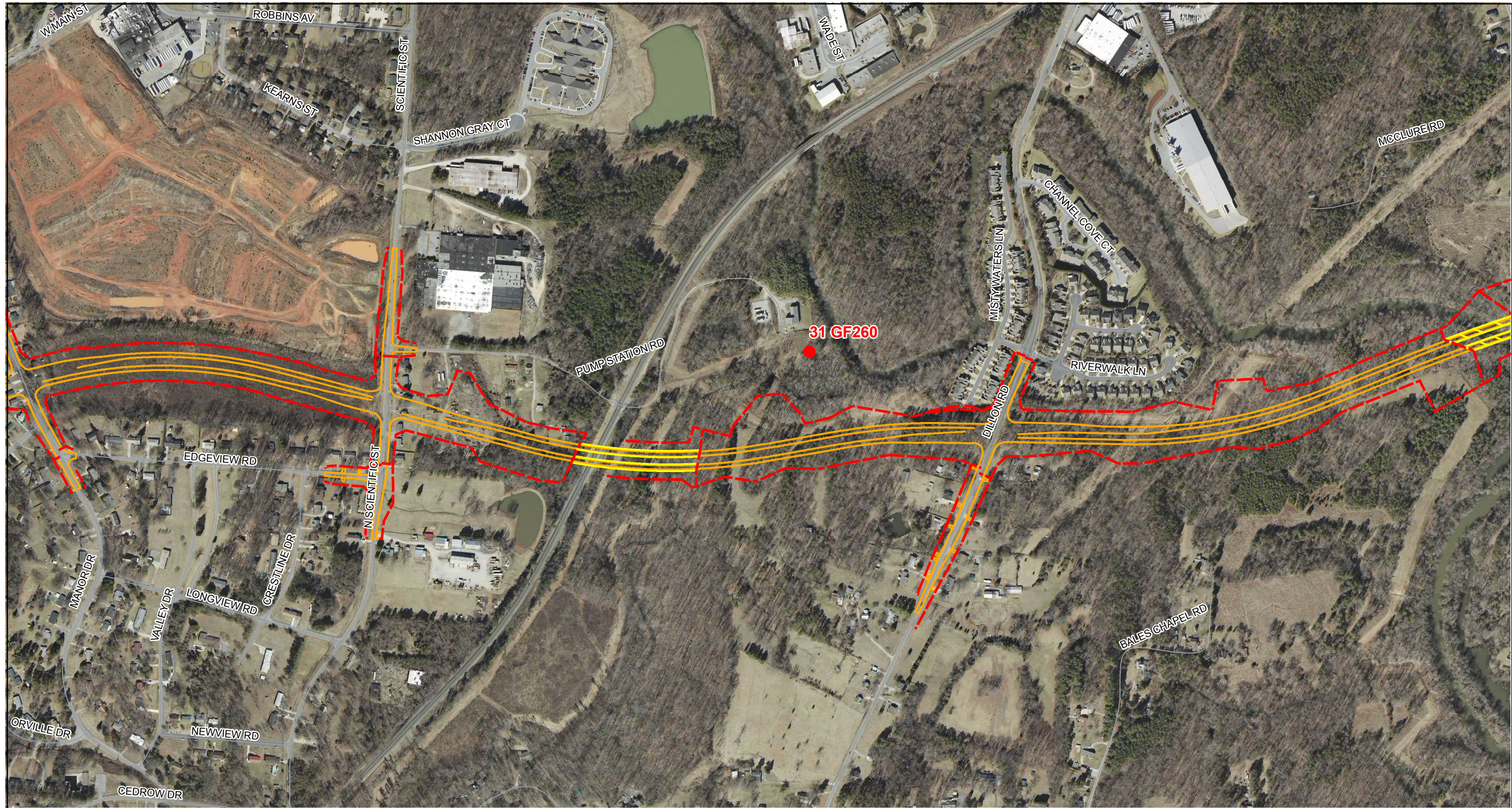
The above comments are made pursuant to Section 106 of the National Historic Preservation Act and the Advisory Council on Historic Preservation's Regulations for Compliance with Section 106 codified at 36 CFR Part 800.

Thank you for your cooperation and consideration. If you have questions concerning the above comment, please contact Renee Gledhill-Earley, environmental review coordinator, at 919/733-4763.

cc: Matt Wadsworth, FHWA  
Wilkerson, NCDOT

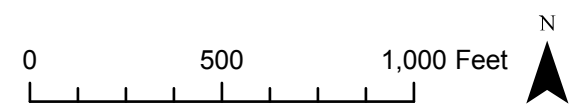
	Location	Mailing Address	Telephone/Fax
Administration	507 N. Blount St, Raleigh, NC	4617 Mail Service Center, Raleigh 27699-4617	(919) 733-4763 • 733-8653
Restoration	515 N. Blount St, Raleigh, NC	4613 Mail Service Center, Raleigh 27699-4613	(919) 733-6547 • 715-4801
Survey & Planning	515 N. Blount St, Raleigh, NC	4618 Mail Service Center, Raleigh 27699-4618	(919) 733-4763 • 715-4801






### Legend

- Archaeological Site
- Local Streets
- Proposed Edge Of Travel
- Proposed Roadway Bridge
- Proposed ROW



	NORTH CAROLINA DEPARTMENT OF TRANSPORTATION PROJECT DEVELOPMENT AND ENVIRONMENTAL ANALYSIS UNIT
	<b>High Point Waterworks Greensboro - High Point Road</b>
	GUILFORD COUNTY TIP PROJECT U-2412A
March, 2018	