



From: Okorn, Barbara [mailto:Okorn.Barbara@epa.gov]

Sent: Thursday, August 11, 2016 2:47 PM

To: Mullins, Sondra L

Cc: Rogers, Alison (FHWA)

Subject: WV 601, Jefferson Road, US 119 to US 60 Environmental Assessment South Charleston, Kanawha County, WV

Ms. Mullins,

Thank you for the opportunity to review the Environmental Assessment (EA) for the Proposed WV 601, Jefferson Road, US 119 to US 60 Project located in Kanawha County, West Virginia. We have reviewed the EA in accordance with the National Environmental Policy Act (NEPA) of 1969, Section 309 of the Clean Air Act and the Council on Environmental Quality (CEQ) regulations implementing NEPA (40 CFR 1500-1508). Based on our review we have the following comments:

- Page 17 states that the bridge piers and abutments are outside of the 100-year floodplain, but the south approach embankment creates minor variations in the 100-year surface water. It is unclear what this means. Impacts should be clearly evaluated and explained in the EA.
- The Table on page 40 indicates that tributary crossings will require new culverts or pipes and some extended culverts to cross the widened Jefferson Road. Again, impacts should be clearly identified and evaluated in the EA.
- The resources should be described in the EA and any studies of the resources should be clearly referenced and attached. This includes terrestrial and aquatic resources. The size of the potential impacts should also be included.
- Stormwater ponds, best management practices (BMPs) and construction staging areas should not be located in wetlands and streams. Stormwater management alternatives that address the existing and new construction should be considered.

- The EA should include a discussion and analysis of greenhouse gas emissions, climate change, and extreme weather events (in particular in association with resiliency design).
- We suggest that a community coordination plan be developed to assist impacted residents with their concerns.
- The assessment is quite sort, and seems to give little consideration to Environmental Justice as related to potential impacts. It would be helpful for maps to show the location and extent of the impacts that may reasonably expected to occur in the study area. Which parts of the block groups will have displacements? Are those displacements in areas where there are minority and/or low income populations? How will the project activities impact residents who may be living or working in the areas where there will be project related work taking place?
- Block level analyses does not provide useful information regarding those living below poverty according to Table 1 in Appendix C at the Block Level. There is no data for the Blocks. The Block group level data shows that the percent of the population living below poverty does not exceed the state average, but exceeds the averages for the Census Tract and County.
- Based upon the data provided, the percent minority values for the County, Census Tract and Block Group all exceed the state average for West Virginia. The percent minority population for Census Tract 130, Block Group 1, Block 1027 is more than three times the state average for minority population; the minority population percentage for Census Tract 130, Block Group 1, Block 1030 is more than twice the state average; values for Census Tract 130, Block Group 1, Block 1051 are more than 3 times the state average. The values for Census Tract 130, Block Group 3 and Census Tract 128 exceed the state average.
- Consideration should be given to the potential for impacts associated with noise, dust, business disruption, traffic, and all other activities associated with the work on this project. This assessment concludes that there will be no impacts on minority and/or low income populations, but fails to provide documentation or justification for the assertion.
- We suggest that the project team continue assessment of social impacts, and continue coordination with the community and state and federal agencies as the project moves forward. Efforts to avoid and minimize impacts to communities and the natural environment including aquatic resources should be developed as detailed planning progresses.

We would be pleased to discuss our comments at your convenience. Please let me know if you have any questions.

Barb

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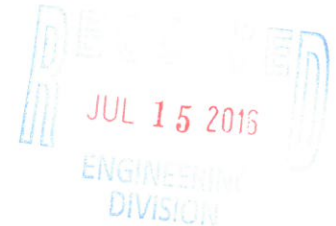
Randall Reid-Smith, Commissioner

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EEO/AA Employer

July 12, 2016

Mr. Ben L. Hark
Section Head
WVDOH, Environmental Section
Engineering Division
1334 Smith Street
Charleston, WV 25301



RE: Jefferson Road Realignment Project
State Project: U220-601-0.00 00
FR# 13-352-KA-3

Dear Mr. Hark:

We have reviewed the above mentioned project to determine its effects to cultural resources. As required by Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations, 36 CFR 800: "Protection of Historic Properties," we submit our comments.

We reviewed the *Environmental Assessment for WV601, Jefferson Road, US 119 to US 60* (May 2016). It is our opinion that all our concerns were previously addressed, considered, and responses recorded in the appendix to this document. We appreciate the opportunity to review and comment, but have nothing further to add at this time. No further consultation is necessary regarding historic resources; however, we ask that you contact our office if your project should change.

We appreciate the opportunity to be of service. *If you have questions regarding our comments or the Section 106 process, please contact Ernst E. Blevins, Structural Historian, at (304) 558-0240.*

Sincerely,

A handwritten signature in blue ink that reads "Susan M. Pierce".

Susan M. Pierce
Deputy State Historic Preservation Officer

SMP/EEB