



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Region 6**

**1445 Ross Avenue, Suite 1200**

**Dallas, TX 75202-2733**

January 30, 2012

Louisiana Department of Transportation  
and Development  
Mike Lafleur  
Environmental Section  
1201 Capitol Access Road  
Baton Rouge, LA 70802

**SUBJECT: Wafer Road Extension Draft Environmental Assessment, Bossier Parish, Louisiana**

Dear Mr. Lafleur:

In accordance with our responsibilities under Section 309 of the Clean Air Act (CAA), the National Environmental Policy Act (NEPA), and the Council on Environmental Quality (CEQ) regulations for implementing NEPA, the U.S. Environmental Protection Agency (EPA) Region 6 office in Dallas, Texas, has completed its review of the Draft Environmental Assessment (DEA) for Wafer Road Extension, Bossier Parish, Louisiana. Detailed comments are listed below which more clearly identify our concerns and the informational needs requested for incorporation into the Final EA.

General Comments

The Council on Environmental Quality's Regulations for Implementing NEPA (40 CFR Part 1502.15 - Affected Environment), state the environmental document "shall succinctly describe the environment of the area(s) to be affected or created by the alternatives under consideration". In general, the DEA contains very little characterization of baseline information for each environmental resource. A more thorough characterization of baseline information should be included in the Final EA.

1.0 Description of Proposed Action

Section 1.3 states "Environmental issues relating to the Proposed Action have been treated with a broad scope and evaluated as one project....". Please elaborate on the meaning of this statement. An EA should do the opposite; it should take a "close" look at the impacts to the human and natural environment from the proposed project.

2.2 Project Need

The DEA lists several needs, one of which is to "improve the economic condition of the Project Study Area by increased accessibility to developable lands". This is in contrast to the need to alleviate traffic congestion due to increased population growth in Bossier Parish. Is the

proposed project needed to alleviate congestion due to considerable growth in population or to act as a catalyst for secondary development?

Another stated need is to improve the economic condition of the Project Study Area; however, no evidence is cited that the area is economically stifled or depressed. Thus, the need to improve the economic condition of the study area must be substantiated. The project needs should be reevaluated so as to come to a consensus as to purpose and need of the roadway.

### 3.0 Alternatives Analysis

If Alternative 3 is the preferred alternative, it should be identified as such.

The alternatives analysis that occurs near the end of Chapter 4 should be moved to Chapter 3. The screening of the alternatives usually occurs in the Alternatives section.

Section 3.10 identifies the travel time savings for each alternative, and includes the no build as a baseline. According to Table 3-5, a travel time savings for Alternatives A, B, and C is 2.2 minutes, 2.7 minutes, and 3.0 minutes, respectively. These values are insignificant and do not represent a significant travel time savings.

### 4.0 Impacts

In general, this section should better characterize and quantify the resources within each category. As the three alternatives diverge into different routes, all three alternatives (as opposed to just a "build alternative") should be carried through the impacts evaluation.

#### 4.2.1 Land Use

This section should quantify, by land use, the acres to be converted to transportation uses and the impacts from that conversion.

#### 4.2.5 Socioeconomic/Environmental Justice

EPA recommends the Final EA include census data that characterizes the study area population. This data should be provided on a census block group level. Executive Order 12898- Federal Actions To Address Environmental Justice in Minority Populations and Low-Income Populations, directs federal agencies to make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high adverse human health or environmental effects of its activities on minority and low-income populations. The DEA contains no substantive analysis of project impacts to minority or low-income populations. There is no data to support the conclusion that "there is no known disproportionately high or adverse human health or environmental affects borne by minority and/or low income populations." EPA recommends a thorough analysis of environmental justice concerns before concluding that no disproportionate adverse impacts will take place.

Figure 4-2 should also show residences or create an additional map delineating residences.

#### 4.2.6 Cultural Resources/Tribal Issues

There are potentially several tribes that may be interested or have historical connections to the area. The State of Louisiana recognizes Tribes that the Federal Government does not. While consultation with these tribes is not required due to the non-Federal Recognition status of these Tribes, it would seem logical that the State of Louisiana (who does recognize these Tribes) would have mentioned consultation meetings and potential cultural sites associated with these Tribes. At a minimum, these Tribes should have the opportunity to provide input on this proposed project. Notification of the proposed project should be sent to the following Tribes so they can provide comments and input: Alabama-Coushatta Tribe of Texas, Bayou Lafourche Band of Biloxi-Chitimacha, Caddo Nation, Chickasaw Nation, Chitimacha Tribe of Louisiana, Choctaw Nation of Oklahoma, Coushatta Tribe of Louisiana, Grand Cailou/Dulac Band of Biloxi-Chitimacha, Isle de Jean Charles Band of Biloxi-Chitimacha, Jena Band of Choctaw Indians, Point au Chien Indian Tribe, Quapaw Tribe of Oklahoma, Tunica-Biloxi Indians of Louisiana, and United Houma Nation.

#### 4.2.8 Noise

This section should include a table which includes the noise activity category, the criteria levels (dBA), and a description of the category. It should also contain data on the existing and predicted noise levels for receivers and if those levels are exceeded for each identified receiver. This data should support the conclusion made in the DEA that no noise impacts are expected.

#### 4.3.1 Water Quality

This section should define in more detail the impacts to local water quality from roadway construction, including bridges and culverts. This section should also include details of how the project will adhere to the Clean Water Act Section 401 Certification guidelines. This section should identify any 303(d) impaired waters in the project area and what the impacts are to those impaired waters.

#### 4.3.2 Groundwater

This section should state if the project area overlies an aquifer, and if so, any potential impacts to that aquifer.

#### 4.3.3 Plant Communities

The DEA should disclose the areal extent by species/vegetation type within the study area and what impacts are associated with vegetation removal.

#### 4.3.4 Threatened and Endangered Species

A more thorough description and evaluation of impacts to threatened and endangered species is needed. This section should include a list of parish-wide Federally and State listed threatened and endangered species, preferred habitat, if the project area contains the preferred habitat, and potential impacts from the proposed project.

#### 4.3.5 Wetlands

Under the Section 404(b)(1) guidelines, the U. S. Army Corps of Engineers may only permit discharges of dredged or fill material into waters of the United States that represent the least damaging practicable alternative, so long as the alternative does not have other significant adverse environmental consequences. The Preferred Alternative, Alternative 3, would cause the greatest impacts (> 3 acres) of the three build alternatives. The selection of Alternative 3 as the Preferred Alternative would not meet Section 404(b)(1) guidelines described above. EPA recommends reevaluating the selection of Alternative 3 or better justify its selection.

Table 4-5 (A and B) should clarify if the Acres column refers to the total area of the water delineated or surveyed or to the actual impact. Impacts for all three alternatives should be included in the table.

The U.S. Army Corps of Engineers' (USACE) Jurisdictional Determination should be made available in the Final EA.

#### 4.3.1 Air Quality

Carbon monoxide is noted as a contaminant related to on-road vehicle emissions, and the Environmental Determination Checklist item 9(b) uses project air quality levels exceeding the NAAQS for carbon monoxide as criteria for determining the need for an air quality study. Please explain the DEA's focus on carbon monoxide analysis, while there is not similar focus/discussion regarding ozone (nitrogen oxides and volatile organic compounds) and particulate matter.

Section 4.3.11 includes the statement "EPA has designated Bossier Parish as being in ozone attainment with limited maintenance plan requirements." Is this statement indicating that Bossier Parish is currently under a limited maintenance plan for ozone? Please clarify.

Any demolition, construction, rehabilitation, repair, dredging or filling activities have the potential to emit air pollutants and we recommend best management practices be implemented to minimize the impact of any air pollutants. Furthermore, construction and waste disposal activities should be conducted in accordance with applicable local, state and federal statutes and regulations.

EPA encourages the use of clean, lower-emissions equipment and technologies to reduce pollution. EPA's final Highway Diesel and Nonroad Diesel Rules mandate the use of lower-sulfur fuels in nonroad and marine diesel engines beginning in 2007.

#### 4.5.2 Cumulative Impacts

Cumulative impacts are those impacts "on the environment which result from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or persons undertake such actions." EPA suggests the Final EA include a thorough analysis of cumulative impacts by setting spatial and temporal boundaries for each resource and including a list and description of past, present, and reasonably foreseeable future projects and their cumulative effects on the natural and human environment.

#### 4.6 Selection of Preferred Alternative

Table 4-8 clearly outlines that Alternative 3 is the most environmentally damaging alternative. According to Section 4.6.2, Alternative 3 is selected as the preferred alternative because it is "more favorable to spurring development", makes "new development more favorable", "provides greater connectivity", and will "give areas north of Bellevue Road the ability to develop more rapidly". It appears that the environmental impact of Alternative 3 is discounted for the need to influence additional growth in the area. EPA recommends the Purpose and Need statements be re-evaluated and thoroughly defined, justified, and documented so as to justify why the impacts (especially wetlands) from Alternative 3 are acceptable. Alternatives 1 and 2 may not have the ability to spur as much development as Alternative 3, but do have fewer impacts.

We appreciate the opportunity to provide comments for the DEA. Thank you for your coordination and don't hesitate to contact John MacFarlane, of my staff, at 214-665-7491 or [macfarlane.john@epa.gov](mailto:macfarlane.john@epa.gov) should you have any questions or concerns regarding this letter.

Sincerely,



Rhonda Smith  
Chief, Office of Planning and  
Coordination