



STATE OF ALABAMA
ALABAMA HISTORICAL COMMISSION
468 SOUTH PERRY STREET
MONTGOMERY, ALABAMA 36130-0900

FRANK W. WHITE
EXECUTIVE DIRECTOR

July 2, 2009

TEL: 334-242-3184
FAX: 334-240-3477

Amy Wirsching
NPS Southeast Regional Office
Atlanta Federal Center 1924 Building
100 Alabama Street, SW
Atlanta, Georgia 30303

Re: AHC 04-0495
EIS & GMP
Tuskegee Airmen National Historic Site
Macon County, Alabama

Dear Ms. Wirsching:

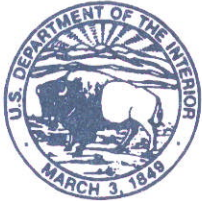
Thank you for the fine document submitted by your office. We have determined that we concur with the proposed activities associated with the preferred alternative.

We appreciate your continued efforts on this project. Should you have any questions, please contact Greg Rhinehart at (334) 230-2662. Please have the AHC tracking number referenced above available and include it with any correspondence.

Truly yours,

Elizabeth Ann Brown
Deputy State Historic Preservation Officer

EAB/AHM/CM/gcr



United States Department of the Interior

FISH AND WILDLIFE SERVICE

1208-B Main Street
Daphne, Alabama 36526

JUL 09 2009

IN REPLY REFER TO:
2009-TA-0629

Ms. Amy Wirsching, Project Manager
National Park Service
Southeast Regional Office
100 Alabama Street, S.W.
1924 Building
Atlanta, Georgia 30303

Dear Ms. Wirsching:

Thank you for your letter received June 12, 2009, notifying us of the public review and comment period for the Tuskegee Airmen National Historic Site's (TUAH) Draft General Management Plan/Environmental Impact Statement in Macon County, Alabama. We have reviewed your information and are providing the following comments in accordance with the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. et seq.) and the Endangered Species Act (ESA) of 1973 (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.).

Endangered Species

Our records indicate that the following listed species may occur within or near TUAH:

southern clubshell (*Pleurobema decisum*) – Endangered, critical habitat
fineline pocketbook (*Lampsilis altalis*) – Threatened, critical habitat
ovate clubshell (*Pleurobema perovatum*) – Endangered, critical habitat
red-cockaded woodpecker (*Picoides borealis*) – Endangered

Based on our records and data, TUAH is within the historic range of the red-cockaded woodpecker (USFWS 1985). However, based on a survey report by a forester provided with previous project reviews for this site, no suitable habitat occurs within the project area.

Based on our records and data, the three above-listed mussel species and designated critical habitat for these three species occur downstream of the confluence of a tributary in TUAH with Uphapee Creek (USFWS 2000).

We are concerned about potential adverse effects future activities or construction projects may have on these mussel species. Construction activities could result in downstream sedimentation and turbidity, with potential adverse effects on these listed mussels and their habitats in Uphapee Creek. Such disturbances may result in detrimental effects on other aquatic species as well.

www.fws.gov



PHONE: 251-441-5181

FAX: 251-441-6222

For an assessment of possible impacts, we request detailed plans of future projects once developed. We are enclosing recommendations below you may wish to incorporate in the plan development for protection of the listed species, and fish and wildlife resources in general. We may have additional comments and/or recommendations once we have reviewed detailed plans.

The TUAJ General Management Plan does not propose specific on-the-ground actions, therefore, no further endangered species consultation will be required for this portion of the project unless: 1) the identified action is subsequently modified in a manner that causes an effect on a listed species or on proposed or designated critical habitat; 2) new information reveals the identified action may affect Federally protected species or designated critical habitat in a manner or to an extent not previously considered; or 3) a new species is listed or a critical habitat is designated under the ESA that may be affected by the identified action.

If you have any questions or need additional information, please contact Ms. Dianne Ingram at (251) 441-5839. In correspondence, please refer to the reference number above.

Sincerely,

A handwritten signature in blue ink, appearing to read "Dan Pearson, Acting".

William J. Pearson

Field Supervisor

Alabama Ecological Services Field Office

Enclosure

Reference:

USFWS. 1985. Recovery plan for the red-cockaded woodpecker. U.S. Department of the Interior, Fish and Wildlife Service, Atlanta, Georgia. 88 pages.

USFWS. 2000. Mobile River Basin Aquatic Ecosystem Recovery Plan. Atlanta, GA. 128 pp.

Recommended Best Management Practices for Future Activities:

We recommend incorporating the following measures into the project design to protect water quality:

- Implement best management practices (BMPs) to minimize erosion and prevent sedimentation of drainages in the project area, both during and after installation of new water system improvements.
- Develop an erosion control plan tailored to the site. All erosion and sediment controls should be inspected routinely, especially during and immediately following significant rain events, to ensure no impacts to nearby surface waters and aquatic habitat. Immediate corrective action should be taken if erosion or sedimentation is observed.
- Where the mains will parallel drainages, maintain a naturally vegetated buffer (preferably 100 feet or greater) adjacent to any ditches or drainages to reduce erosion and protect water quality.
- Immediately revegetate any disturbed areas with a native species or an annual grass.
- Avoid placement of water mains in the floodplain or riparian zone to help protect water quality.
- If wetlands or tributaries must be spanned by the pipeline, attach the pipeline to existing bridges or directionally drill under these water bodies.
- To the extent feasible, complete any work that results in exposed earth during periods when significant rainfall is not predicted.
- Conduct any work that involves clearing large tracts of land in phases, where practicable, with rapid revegetation upon completion of each phase.
- Avoid any major stream alteration if at all possible. As an alternative, develop a comprehensive stormwater management plan using measures such as pervious surfacing materials, stormwater diversion, retention ponds, and revegetation with trees and natural vegetation, rather than stream alteration for flood control.
- Use integrated pest management practices for exotic plant removal to reduce or eliminate impacts to aquatic habitat.

For specific techniques, see "The Alabama Handbook for Erosion Control, Sediment Control and Stormwater Management on Construction Sites and Urban Areas" (2003), available from the Alabama Soil and Water Conservation Committee or on-line at: <http://swcc.state.al.us/>



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

July 17, 2009

Mr. Steven M. Wright
Acting Chief, Planning and Compliance Division
National Park Service
Southeast Regional Office
Atlanta Federal Center
1924 Building
Alabama Street., S.W.
Atlanta, Georgia 30303

**RE: EPA Review Comments on Draft General Management Plan/ Environmental Impact Statement for Tuskegee Airmen National Historic Site
DEIS 09-26**

Dear Mr. Wright:

The U.S. Environmental Protection Agency (U.S. EPA) Region 4 reviewed the subject Draft Environmental Impact Statement (DEIS) pursuant to Section 309 of the Clean Air Act, and Section 102 (2)(C) of the National Environmental Policy Act (NEPA). The purpose of this letter is to provide you with the EPA's comments.

MANAGEMENT ZONES AND ALTERNATIVES

The DEIS assesses the potential environmental impacts of the management plan for the management and use of the Tuskegee Airman National Historic Site in Alabama. Building blocks for reaching a National Park System approved plan are management zones and alternatives. Five management zones have been identified for Tuskegee Airmen NHS, including: Historic 1945 Zone, Visitor Orientation Zone, Administration Zone, Recreation Zone, and Nature Discovery Zone. Four action alternatives and a no-action alternative are discussed in the DEIS. The alternatives which were discussed in the DEIS consist briefly of: Alternative A) the no-action alternative, Alternative B) emphasizes the natural environment by keeping Tuskegee Airmen NHS largely undeveloped and natural in character outside of the core historic area, Alternative C) aims to restore much of the park to its historic 1945 appearance, Alternative D) is the National Park Service's (NPS) and the environmentally preferred alternative which offers the most diversity of visitor interpretive programs, recreational opportunities, and preserving cultural resources and Alternative E) which offers the most recreational opportunities.

Alternative D (the Preferred Alternative) is the only alternative to contain all five of the management zones. The Preferred Alternative provides park visitors a strong "stepping back into time" experience to the war years with a focus on the flight training experience. The proposed improvements to the site would reflect the historic appearance of the site during the year 1945 and the park would provide visitor services compatible with the projected visitor load and composition. Visitation is expected to increase from the current 30,000 people per year to approximately 495,000 annual visitors within the initial five years, based on full build-out of the site, which includes the future Tuskegee Airmen National Center (TANC). Approximately 75 percent of visitors to the proposed facilities would include the future TANC in their visit.

POTENTIAL IMPACTS and DATA REQUEST

Floodplains

Maps depicting the footprint for the Preferred Alternative were overlaid on the floodplain area maps using best professional judgment to identify direct impacts to floodplains. Based on FEMA mapping, three floodplain zones are located in the Tuskegee Airmen NHS. Several activities included in the proposed action will occur or partially occur within the floodplain including vegetation clearing, rehabilitation of the historic pond and plane tie down area, and construction of a storm water detention pond. These are the historic areas of the site therefore rehabilitation must take place on site. Rehabilitating the plane tie-down area is necessary to return the landscape to the period of significance of the Tuskegee Airmen. The plane tie-down area is currently failing impervious surface and this asphalt will be replaced. Construction of a storm water pond in the floodplain would also alter the floodplain; however, it would provide water management functions consistent with the function of floodplains. The storm water detention pond would temporarily detain storm water, preventing it from flooding adjacent areas in the floodplain already prone to flooding during storm events. The vegetation removal and rehabilitation of the historic pond are necessary to rehabilitate the historic landscape. New vegetation appropriate to the historic period of significance would be planted and the area would be maintained as vegetated. No flood storage volume would be lost as a result of these projects. Alternatives to vegetation removal were not considered since the vegetation removal within the 100-year floodplain is necessary to rehabilitate the historic landscape.

EPA recommends, as is feasible, that construction impacts to floodplain areas and communities should be avoided during the new construction activities, including the clearing of the vegetation within the floodplain, the improvement of impervious surfaces at the plane tie-down area, and excavation of the historic pond. In order to minimize and mitigate the environmental impacts, an erosion and sediment control plan should be prepared and included in the final construction plans. Disturbance of vegetation should be minimized with replanting the area disturbed by construction activities with appropriate native species.

Best Management Practices (BMPs) should be required during construction to minimize impacts of pond construction and vegetation removal within the floodplain. New vegetation

appropriate to the historic period of significance should be planted and the area should be maintained as vegetated. No flood storage volume should be lost as a result of these projects.

Please clarify in the FEIS the term "...clearing of vegetation". If it includes shrubs and trees that provide habitat and stream stabilization functions, then their removal may result in disturbance and loss of integrity of the floodplain, and thus should be addressed.

Endangered Species

The unnamed tributary affected by the project drains into a segment of Uphapee Creek extending from Alabama Highway 199 upstream to confluence of Opintlocco and Chewacla Creeks, which has been proposed as Critical Habitat (68 FR 14751-14832, March 26, 2003) for the following Federally listed mussel species:

Southern clubshell (*Pleurobema decistri*) - Endangered
Fineline pocketbook (*Lanzsotis ntilis*) - Threatened
Ovate clubshell (*Pleurobema rostratum*) - Endangered

Based on records, the above listed mussel species still occur downstream of the confluence of the tributary with Uphapee Creek (USFWS 2004). Also, based on records, the project area is within the historic range of the red-cockaded woodpecker (USFWS 1985), however, suitable habitat for this species does not occur within the park (NPS 2004).

The EPA's recommendations for mitigating impacts on these species are as follows:

1. Avoid any major stream alteration if at all possible. As an alternative, develop a comprehensive storm water management plan using measures such as pervious surfacing materials, storm water diversion, retention ponds, and revegetation with trees and natural vegetation, rather than stream alteration for flood control.
2. If stream alteration is absolutely necessary, develop specific best management practices (BMPs) to limit downstream disturbance, particularly sedimentation and turbidity, during and after construction. BMPs should include avoidance of construction activity except during dry, low-water periods; use of a temporary coffer dam and/or siltation fences and use of hay bales. Any dredge spoil or debris should be disposed on an upland site with low erosion potential.
3. Employ techniques to reduce impacts on wildlife, including visitor education programs, restrictions on visitor activities, and park ranger patrols.
4. Implement a natural resource protection program during construction activities. Standard measures would include construction scheduling, biological monitoring, erosion and sediment control.

SUSTAINABLE (“GREEN”) INFORMATION

In the spirit of collaboration and technical assistance the EPA would like to offer some sustainable activities which could be considered in the Tuskegee Airmen NHS project.

Green Building

Green building is the practice of creating structures and using processes that are environmentally responsible and resource-efficient throughout a building's life-cycle from design to, construction, operation, maintenance, renovation and deconstruction. This practice expands and complements the classical building design concerns of economy, utility, durability, and comfort. Green building is also known as a sustainable or high performance building.

Green buildings are designed to reduce the overall impact of the built environment on human health and the natural environment by:

- Efficiently using energy, water, and other resources
- Protecting occupant health and improving employee productivity
- Reducing waste, pollution and environmental degradation

For example, green buildings may incorporate sustainable materials in their construction (e.g., reused, recycled-content, or made from renewable resources); create healthy indoor environments with minimal pollutants (e.g., reduced product emissions); and/or feature landscaping that reduces water usage (e.g., by using native plants that survive without extra watering).

Why Build Green? In the United States, buildings account for:

- 39 percent of total energy use
- 12 percent of the total water consumption
- 68 percent of total electricity consumption
- 38 percent of the carbon dioxide emissions

Potential benefits of green building can include:

Environmental benefits

Enhance and protect biodiversity and ecosystems
Improve air and water quality
Reduce waste streams
Conserve and restore natural resources

Economic benefits

- Reduce operating costs
- Create, expand, and shape markets for green product and services
- Improve occupant productivity
- Optimize life-cycle economic performance

Social benefits

- Enhance occupant comfort and health
- Heighten aesthetic qualities
- Minimize strain on local infrastructure

For more information on Green Building please visit: <http://www.epa.gov/greenbuilding/>

Green Parking

Green parking refers to several techniques that applied together reduce the contribution of parking lots to total impervious cover. From a storm water perspective, green parking techniques applied in the right combination can dramatically reduce impervious cover and, consequently, reduce the amount of storm water runoff. Green parking lot techniques include: setting maximums for the number of parking lots created; minimizing the dimensions of parking lot spaces; utilizing alternative pavers in overflow parking areas; using bioretention areas to treat storm water; encouraging shared parking; and providing economic incentives for structured parking.

Green parking lots can dramatically reduce the creation of new impervious cover. How much is reduced depends on the combination of techniques used to achieve the greenest parking lot. While the pollutant removal rates of bioretention areas have not been directly measured, their capability is considered comparable to a dry swale, which removes 91 percent of total suspended solids, 67 percent of total phosphorous, 92 percent of total nitrogen, and 80-90 percent of metals (Claytor and Schueler, 1996).

North Carolina's Fort Bragg vehicle maintenance facility parking lot is an excellent example of the benefits of rethinking parking lot design (NRDC, 1999). The redesign incorporated storm water management features, such as detention basins located within grassed islands, and an onsite drainage system that exploited existing sandy soils. The redesign reduced impervious cover by 40 percent, increased parking by 20 percent, and saved 20 percent or \$1.6 million on construction costs over the original, conventional design.

For more information on Green Parking please visit:

http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm?action=factsheet_results&view=specific&bmp=89

Briefly three other sustainable activities which may applicable to the Tuskegee Airmen NHS project are as follows:

- **Green Detention Ponds**
- **Rain Barrels**
- **Rain Gardens**

Information about these three activities can be found on the web.

The scope of this proposed action appears to be within acceptable limits in order to achieve project objectives. Based on the information provided in this document, there appears to be no significant environmental impacts associated with the proposed project alternatives, and we support implementation of the Management Plan. The document received a rating of "LO," (Lack of Objections); that is, we did not identify any potential environmental impacts requiring substantive changes to the proposal. However, please provide additional information in the FEIS on any construction impacts and proposed minimization and mitigation "Best Practices".

We fully support the NPS effort to preserve this important historic site. Thank you for the opportunity to comment on this project. If we may be of further assistance, please contact me or Ken Clark of my staff at (404) 562-8282.

Sincerely,



Heinz J. Mueller, Chief
NEPA Program Office
Office of Policy and Management

Tuskegee University

Founded by Booker T. Washington



Office of the President

August 12, 2009

Ms. Amy Wirsching
Project Manager
Southeast Region
United States Department of Interior
National Park Service
Atlanta Federal Center
1924 Building
100 Alabama Street, NW
Atlanta, Georgia 30303

Dear Ms. Wirsching:

I am pleased to respond to your invitation to review and comment on the draft ***General Management Plan and Environmental Impact Statement for the Tuskegee Airmen National Historic Site***. As co-sponsor with Governor Bob Riley (Alabama) of the ***1997 Moton Field Special Resource Study***, I am very much interested in the full implementation of all approved plans with the appropriate resource base for the Tuskegee Airmen National Historic Site. The 1997 Moton Field Special Resource Study was the basic document used in drafting the final approved legislation H.R. 3910 signed by President Clinton as Public Law 105-355. **The Tuskegee Airmen National Historic Site and the Tuskegee Institute National Historic District** are vital and imperative sites capturing extraordinary American experiences that have enriched and helped to define the character of our country at its best. Additionally, these sites join Tuskegee University as major tourist attractions and must see experiences in the Alabama River Region and southeast United States.

The document was arranged with a presentation of Alternatives (A, B, C, D and E) and a clear indication that the National Park Service is recommending Alternative D; I also centered much of my review around Alternative D, even though my staff did review all alternatives for clarity and purpose. Alternative D is Tuskegee University's preferred alternative and captures the full spirit of the original vision for a state-of-the-art, education and interpretive experience for visitors worldwide. In addition, Alternative D provides expanded opportunities for additional recreational, cultural and educational experiences that capture the greatest opportunity to use the vast natural resources to enhance the visitor experience, i.e., RV hookups, picnic and recreational areas, and hiking trails.

Ms. Amy Wirsching
August 12, 2009
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Specifically, with the completion of Phase 1 and 2 and the hope that Phase 3 will be funded and completed, these deliverables provide great momentum to begin the planning process for the next major and critical component of the development, i.e., the creation of the **Tuskegee Airmen National Center (TANC)**. The TANC is a vital component of the entire complex and is very much needed to comprehensively tell the historically correct story of the famed Tuskegee Airmen coupled with the re-introduction of Flight Training at Tuskegee University through the Charles "Chief" Alfred Anderson Department of Aviation.

As a final note, I hope great attention is given to staffing and the resource base needed to mount a sustaining and representative National Park Service offering that captures the attention of the visiting publics. A diminishing resource base will truly erode the expectations of a general public who waited with great anticipation for a state-of-the-art historical complex capturing the significant contribution of American heroes, the famed Tuskegee Airmen.

If you have any questions or need additional information, please feel free to contact me directly at 334-727-8501. You may also contact Mr. Getchel L. Caldwell II, Vice President for Advancement at 334-727-8540 or gcaldwell@tuskegee.edu. Tuskegee University remains committed in presenting the American story through those venues and parks of which we are legal and moral partners.

Sincerely,



Benjamin F. Payton
President

cc: Getchel L. Caldwell II
Vice President for Advancement